Appendix A
NOP and Scoping Comments

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

Fenton Parkway Bridge Project

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

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-feet-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** 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:

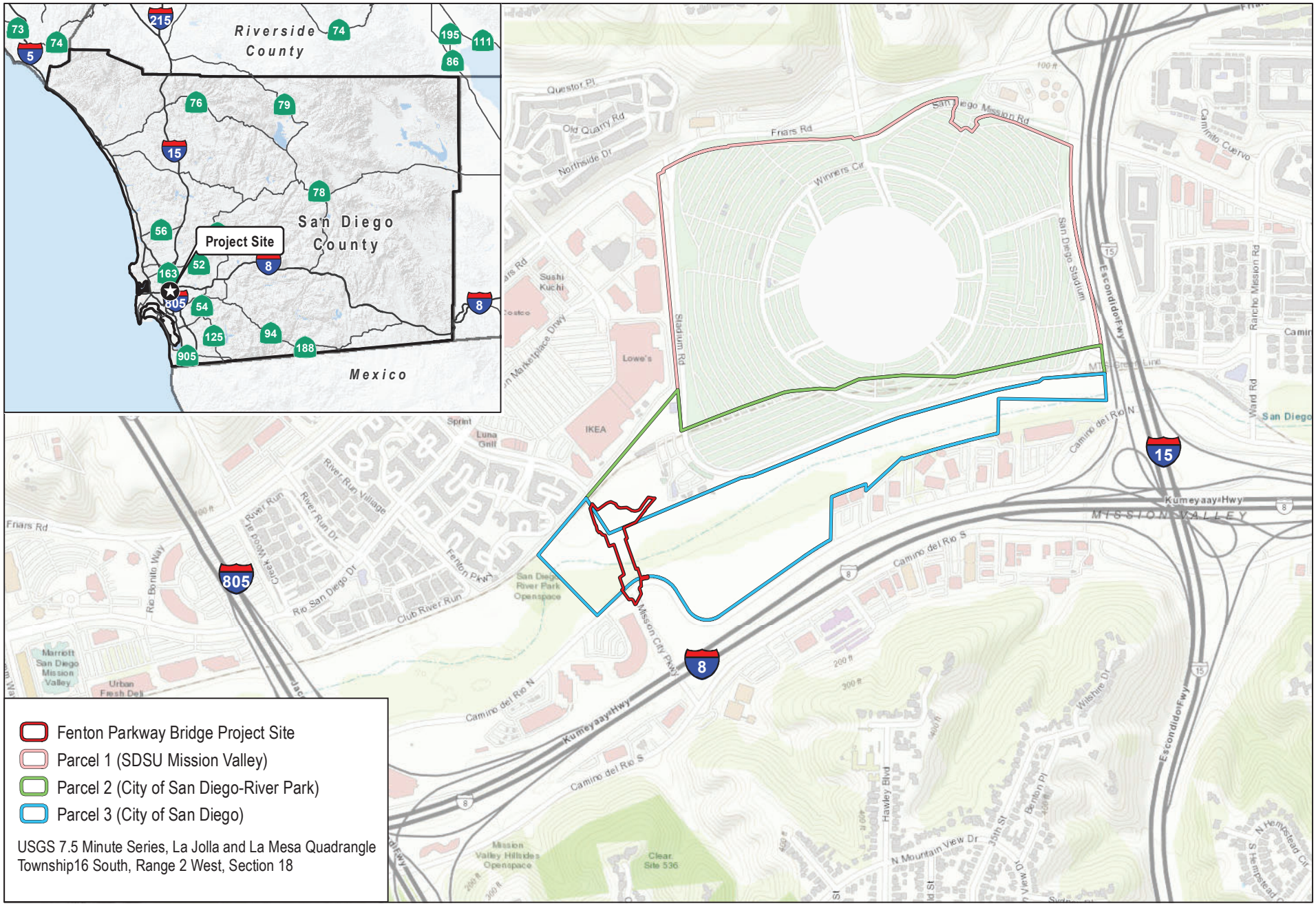
1. Consistency with the Multiple Species Conservation Plan (Findings prepared by the City of San Diego regarding the proposed project)
2. Approval of various easements, including vacations, replacements, etc. (issued by the City of San Diego consistent with the terms of the MOU)
3. Permits to construct 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

DUDEK

0 500 1,000 Feet

FIGURE 1

Project Vicinity and Location

Fenton Parkway Bridge Project

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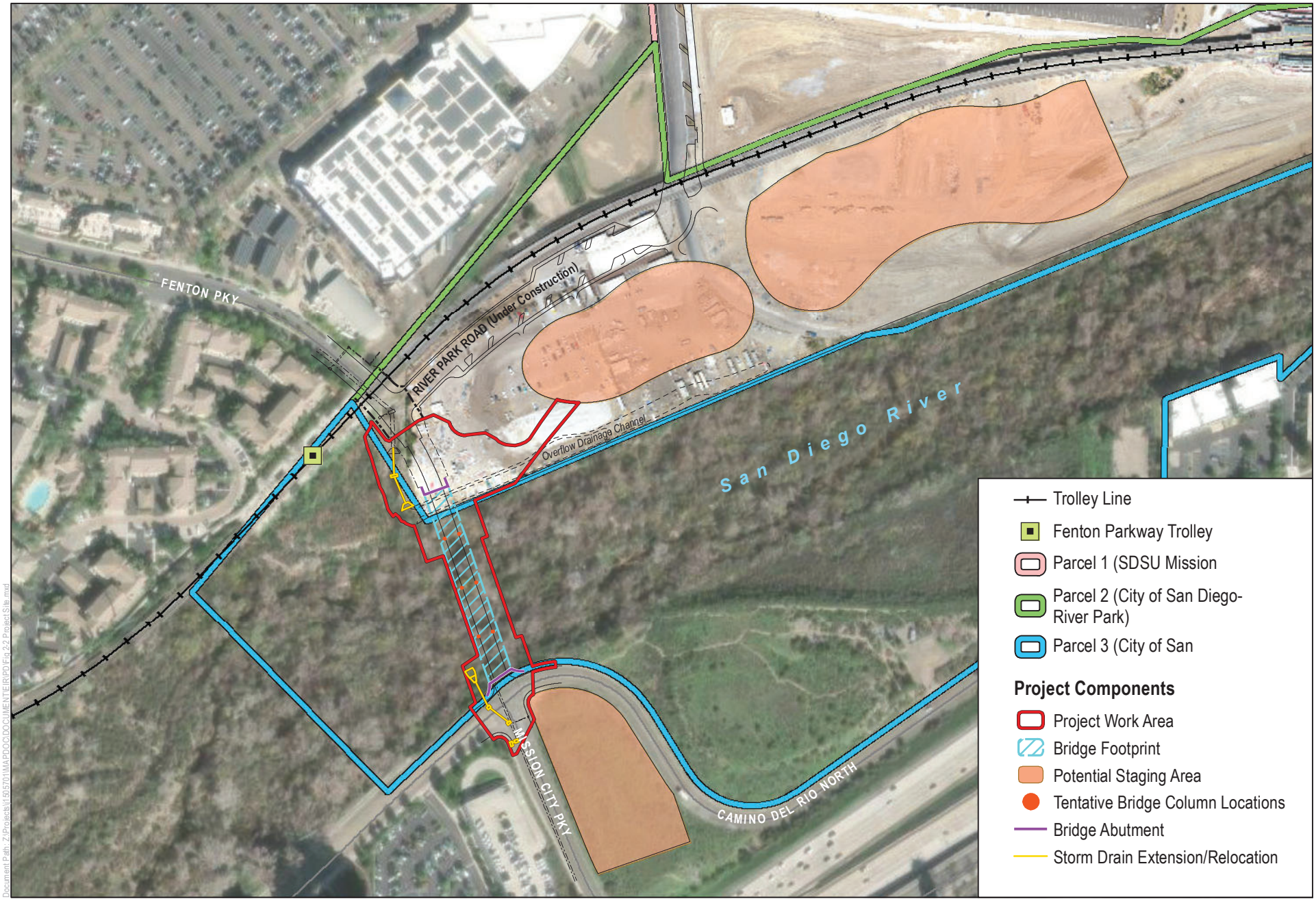

Document Path: Z:\Projects\14 50570114\APDOC\DOCUMENTS\RIVPD\Fig 2-2 Project Site.mxd

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

DUDEK

0 150 300 Feet

FIGURE 2
Project Site
Fenton Parkway Bridge Project

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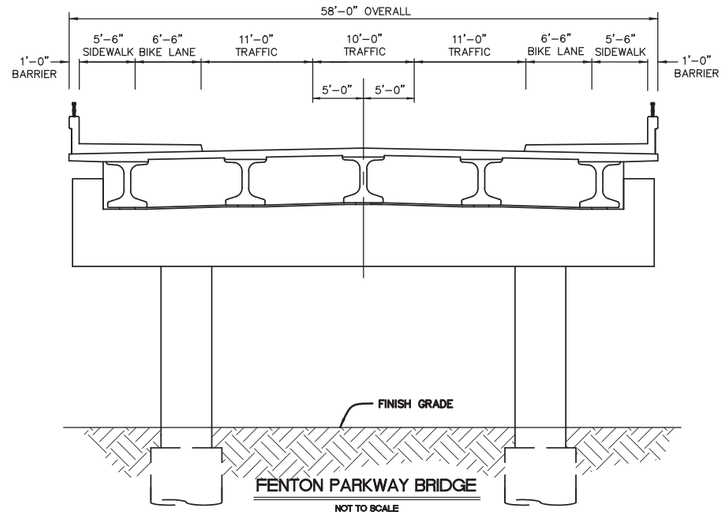
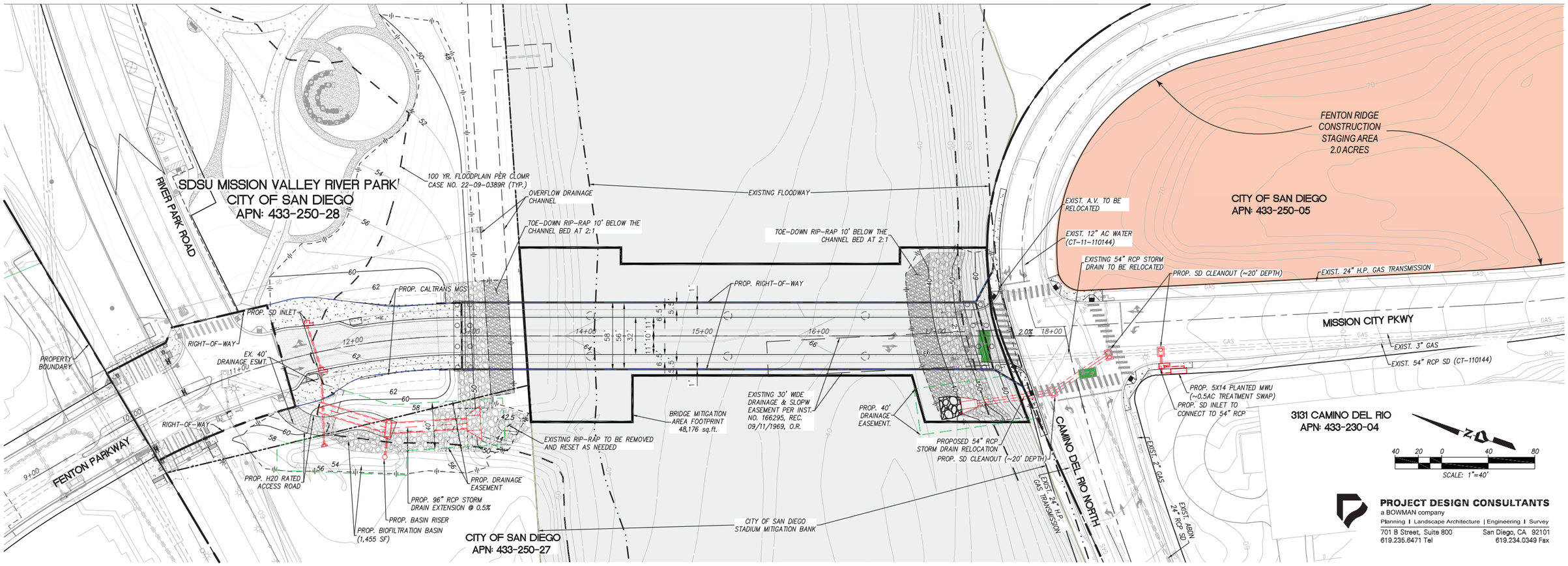


FENTON PARKWAY BRIDGE

NOT TO SCALE



PROJECT DESIGN CONSULTANTS
a BOWMAN company
Planning | Landscape Architecture | Engineering | Survey
701 B Street, Suite 800 San Diego, CA 92101
619.235.6471 Tel 619.234.0349 Fax

File Name P:\4497.00\Engr\Exhibits\Prelim Fenton Bridge\Fenton Bridge_Prelim.dwg, Date Last Saved 5/5/2023 1:42:10 PM, Date Plotted Last 5/8/2023 9:53:51 PM

SOURCE: BOWMAN/PDC 5/08/2023

DUDEK

FIGURE 3
Project Site Plan
Fenton Parkway Bridge Project

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PUBLIC DRAFT

Initial Study

Fenton Parkway Bridge Project

MAY 2023

Prepared for:

THE BOARD OF TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY
401 Golden Shore
Long Beach, California 90802

Prepared by:

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Table of Contents

SECTION **PAGE**

FIGURES

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.

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.

☒ Aesthetics	☐ Agriculture and Forestry Resources	☒ 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	☐ Mineral Resources
☒ Noise	☐ Population and Housing	☐ Public Services
☐ Recreation	☒ Transportation	☒ Tribal Cultural Resources
☒ Utilities and Service Systems	☒ Wildfire	☒ 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.

Signature

May 22, 2023
Date

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☒	☐	☐	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☒	☐	☐	☐
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?	☒	☐	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☒	☐	☐	☐

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
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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
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))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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
III. AIR QUALITY – 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?	☒	☐	☐	☐
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?	☒	☐	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☒	☐	☐	☐

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
IV. BIOLOGICAL RESOURCES – Would the project:				
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?	☒	☐	☐	☐
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?	☒	☐	☐	☐
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?	☒	☐	☐	☐
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?	☒	☐	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☒	☐	☐	☐
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?	☒	☐	☐	☐

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 corridoes, 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
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☒	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☒	☐	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☒	☐	☐	☐

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
VI. Energy – 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?	☒	☐	☐	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☒	☐	☐	☐

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
VII. GEOLOGY AND SOILS – 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.	☒	☐	☐	☐
ii) Strong seismic ground shaking?	☒	☐	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☒	☐	☐	☐
iv) Landslides?	☒	☐	☐	☐
b) Result in substantial soil erosion or the loss of topsoil?	☒	☐	☐	☐
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?	☒	☐	☐	☐
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?	☒	☐	☐	☐
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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐

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
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

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
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☒	☐	☐	☐

	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?	☒	☐	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☒	☐	☐	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☒	☐	☐	☐

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
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☒	☐	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☒	☐	☐	☐
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;	☒	☐	☐	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site;	☒	☐	☐	☐
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	☒	☐	☐	☐
iv) impede or redirect flood flows?	☒	☐	☐	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☒	☐	☐	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☒	☐	☐	☐

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 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
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☒	☐
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?	☒	☐	☐	☐

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
XII. MINERAL RESOURCES – 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

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
XIII. NOISE – Would the project result in:				
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?	☒	☐	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
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?	☐	☐	☐	☒

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
XIV. POPULATION AND HOUSING – Would the project:				
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)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

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
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?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

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
XVI. RECREATION				
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

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
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☒	☐	☐	☐
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☒	☐	☐	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐
d) Result in inadequate emergency access?	☒	☐	☐	☐

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
XVIII. TRIBAL CULTURAL RESOURCES				
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	☒	☐	☐	☐
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 subdivisil(c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivlon (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

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
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
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?	☒	☐	☐	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☒	☐	☐	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☒	☐	☐	☐

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
XX. WILDFIRE – 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?	☒	☐	☐	☐
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?	☒	☐	☐	☐
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?	☒	☐	☐	☐
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?	☒	☐	☐	☐

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
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
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?	☒	☐	☐	☐
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.)	☒	☐	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

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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4 References and Preparers

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Sarah Lozano, AICP, Principal
Kirsten Burrowes, Project Manger
Samantha Robinson, Environmental Planner
Lana Riley, Environmental Planner
Owen Baer, Environmental Planner
Lesley Terry, GIS Specialist

PDC/Bowman

Martin Jones, PE, Project Manager
Thomas Aristide, EIT, Project Engineer

Kleinfelder

Keith Gazaway, PE, Project Manager

Parsons

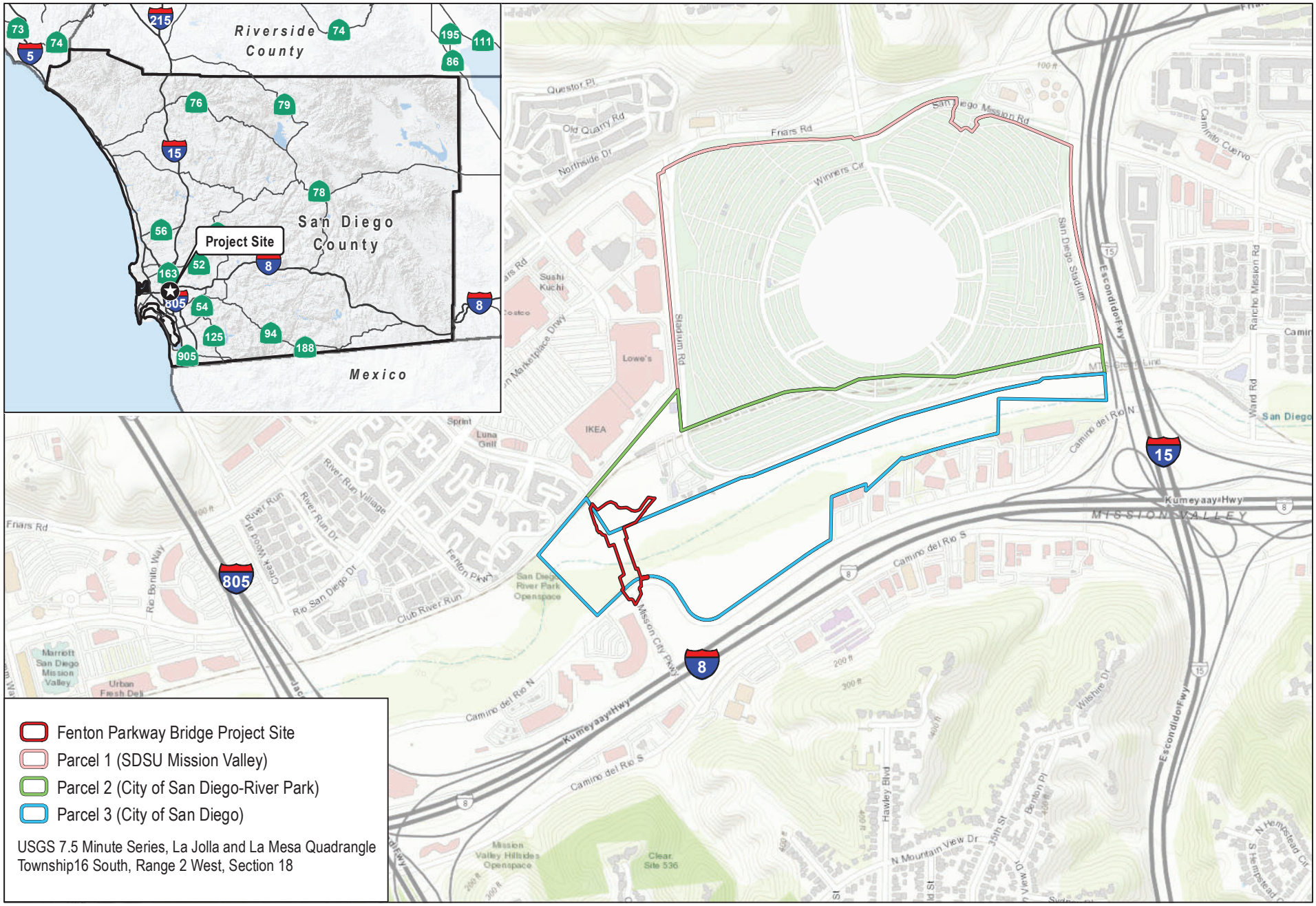
Craig Shannon, PE, Project Manager

Group Delta

Chris Vonk, PE, GE, Senior Engineer

Fehr and Peers

Sohrab Rashid, Principal
Andrew Scher, Transportation Engineer



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

DUDEK

0 500 1,000 Feet

FIGURE 1

Project Vicinity and Location

Fenton Parkway Bridge Project

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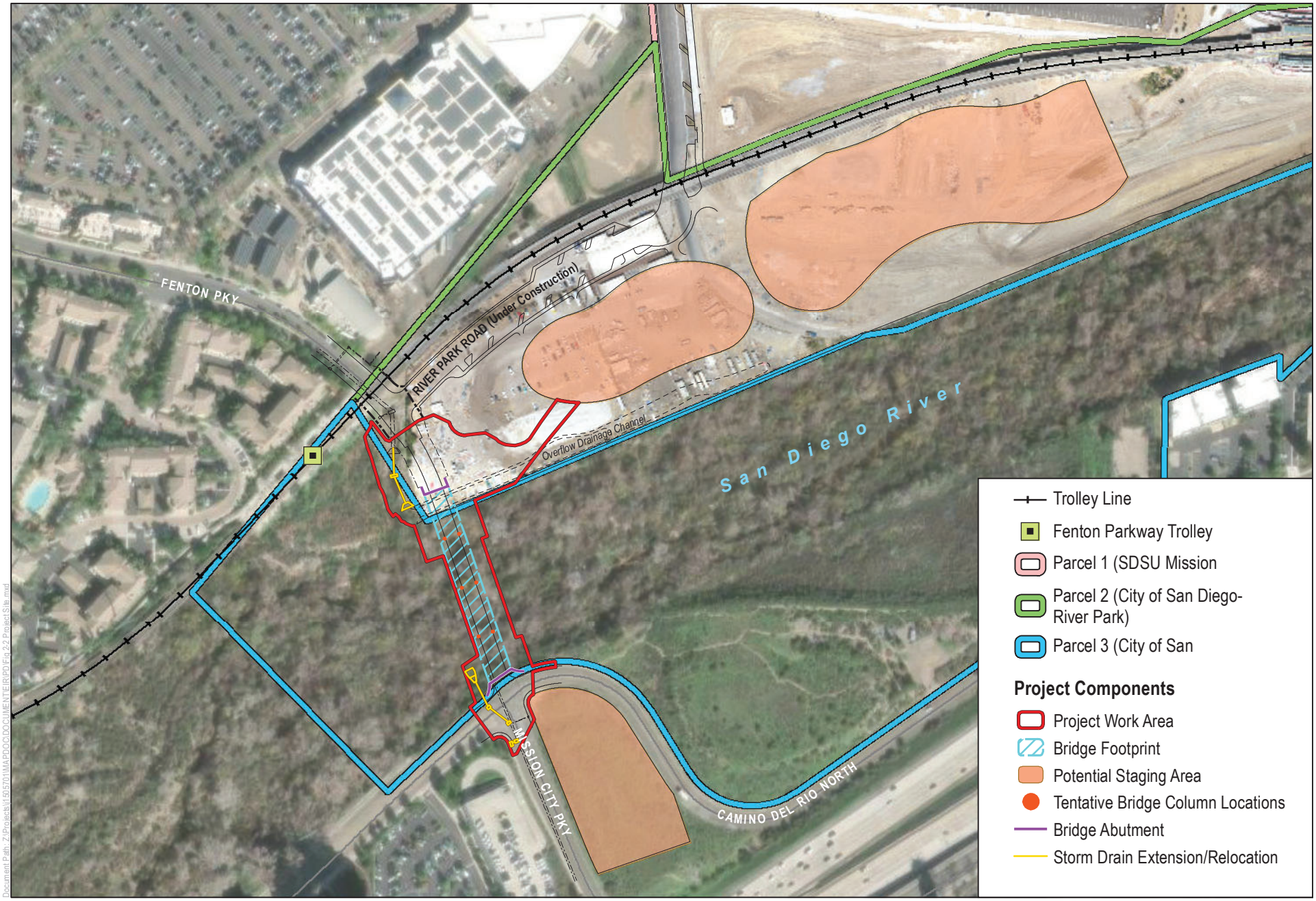

Document Path: Z:\Projects\14 50570011MA\PDOC\DOCUMENTS\RIVPD\Fig 2-2 Project Site.mxd

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

DUDEK

0 150 300 Feet

FIGURE 2
Project Site
Fenton Parkway Bridge Project

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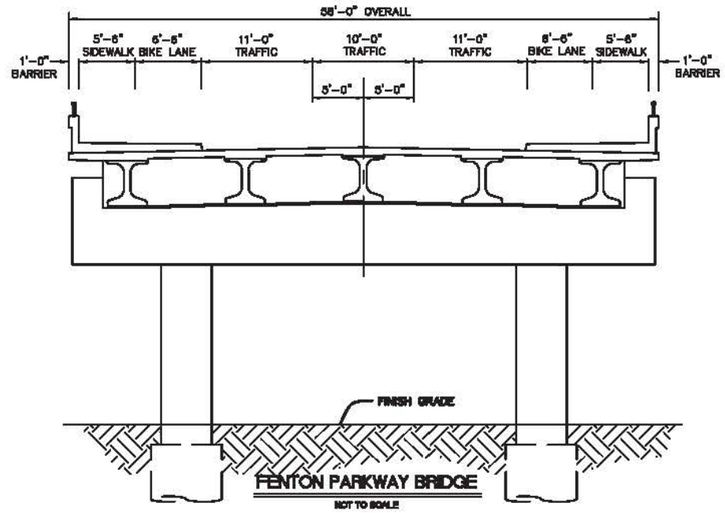

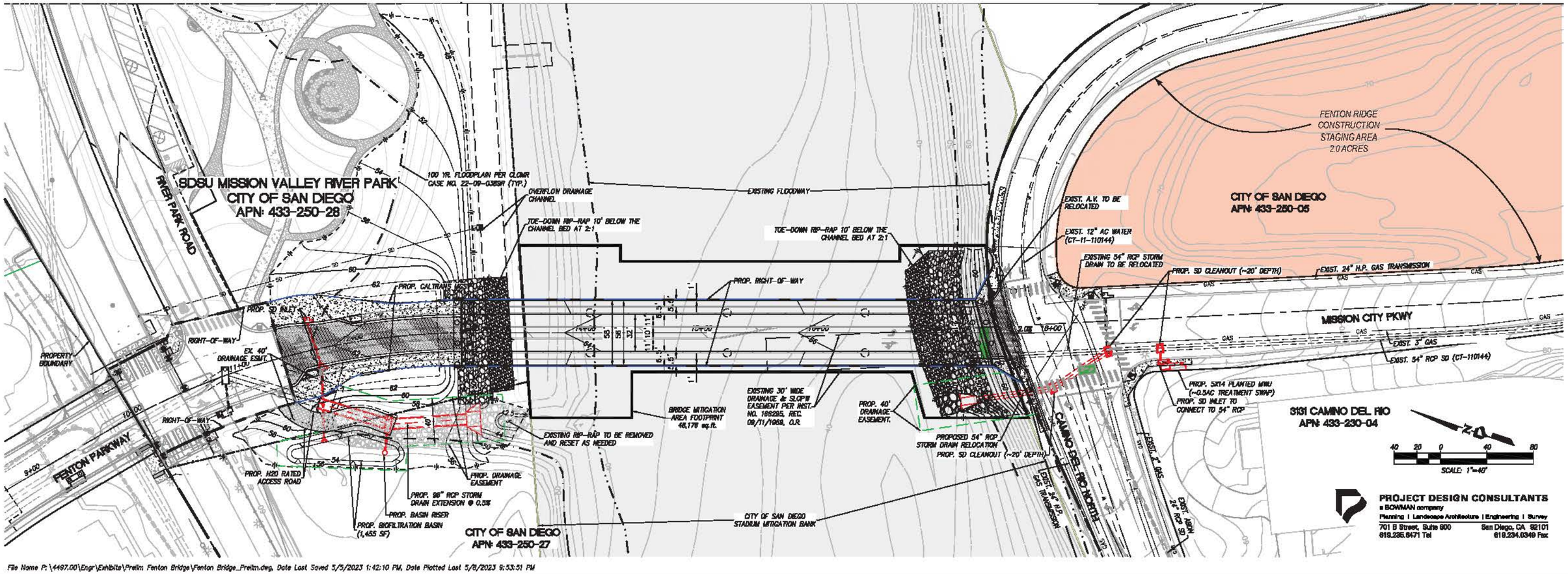

File Name P:\4497.00\Engr\Exhibits\Prelim Fenton Bridge\Fenton Bridge_Prelim.dwg, Date Last Saved 5/5/2023 1:42:10 PM, Date Plotted Last 5/8/2023 9:53:51 PM

SOURCE: BOWMAN/PDC 5/08/2023

FIGURE 3
Project Site Plan
Fenton Parkway Bridge Project

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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

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

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, or Anita Eng of the Service at Anita_Eng@fws.gov.

Sincerely,

JONATHAN SNYDER
Digitally signed by JONATHAN SNYDER
Date: 2023.07.13 13:58:15 -07'00'

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

DocuSigned by:
David Mayer
D700B4520375406...

David A. Mayer
Environmental Program Manager
California Department of Fish and Wildlife

cc:
State Clearinghouse, Sacramento, State.Clearinghouse@opr.ca.gov
David Zoutendyk, USFWS, David_Zoutendyk@fws.gov
Jennifer Turner, CDFW, Jennifer.Turner@wildlife.ca.gov
Karen Drewe, CDFW, Karen.Drewe@wildlife.ca.gov

Enclosure

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

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

The City of SAN DIEGO

City Planning Department and Strategic Projects Department

January 4, 2024

Jonathan Snyder, Assistant Field Supervisor
U.S. Fish and Wildlife Service
Carlsbad Field Office
2177 Salk Avenue
Carlsbad, CA 92008

David Mayer, Environmental Program Manager
California Department of Fish and Wildlife
3883 Ruffin Road
San Diego, CA 92123

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_2), methane (CH_4), and nitrous oxide (N_2O). 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.

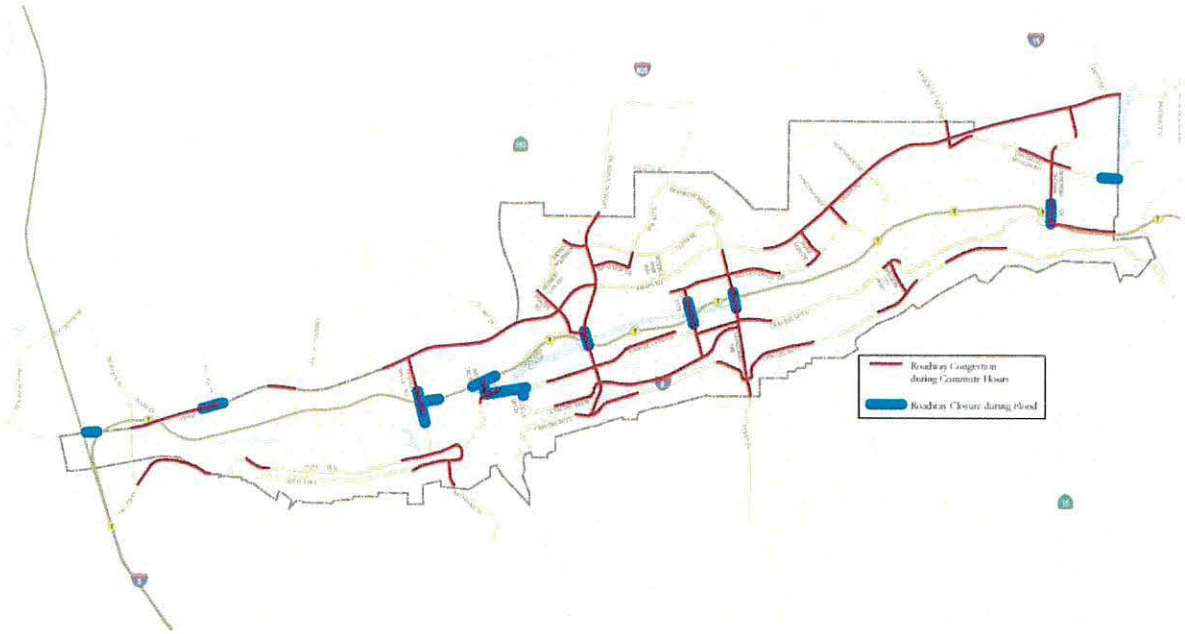
	Base Year (2012)	**Buildout (2050)**	**Net Increase**	**Percent Change**
Housing Units	11,240	39,160	27,910	248%
Household Population	20,800	72,400	51,600	248%
Non-Residential Square Feet	17,667,000	25,038,000	7,371,000	42%
Employment	45,600	64,700	19,100	42%
Hotel Rooms	6,696	8,249	1,553	23%

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:

- 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.

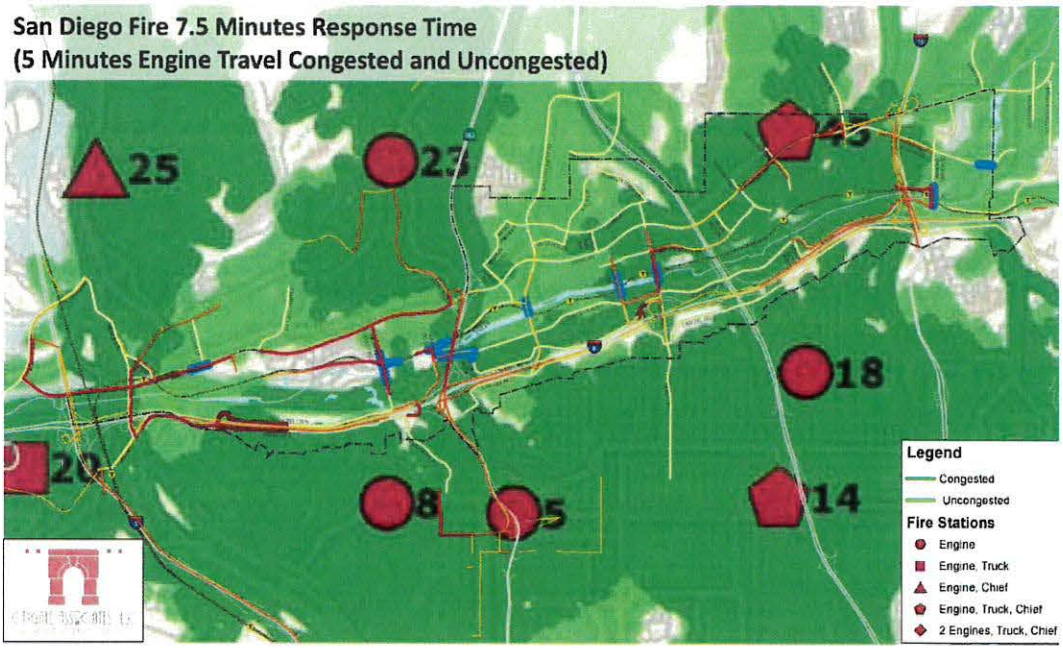
Emergency response concerns during flooding:

- 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.

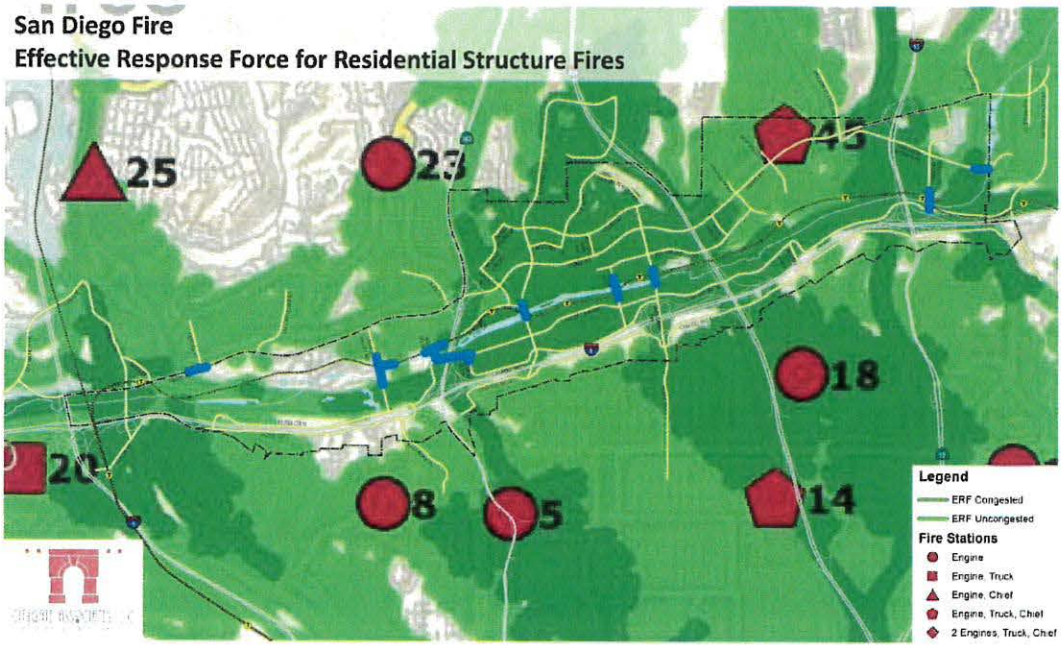
EMERGENCY SERVICES, (FIRE-RESCUE DEPARTMENT)

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. 21inserted 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 trolly 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

KF/mg

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
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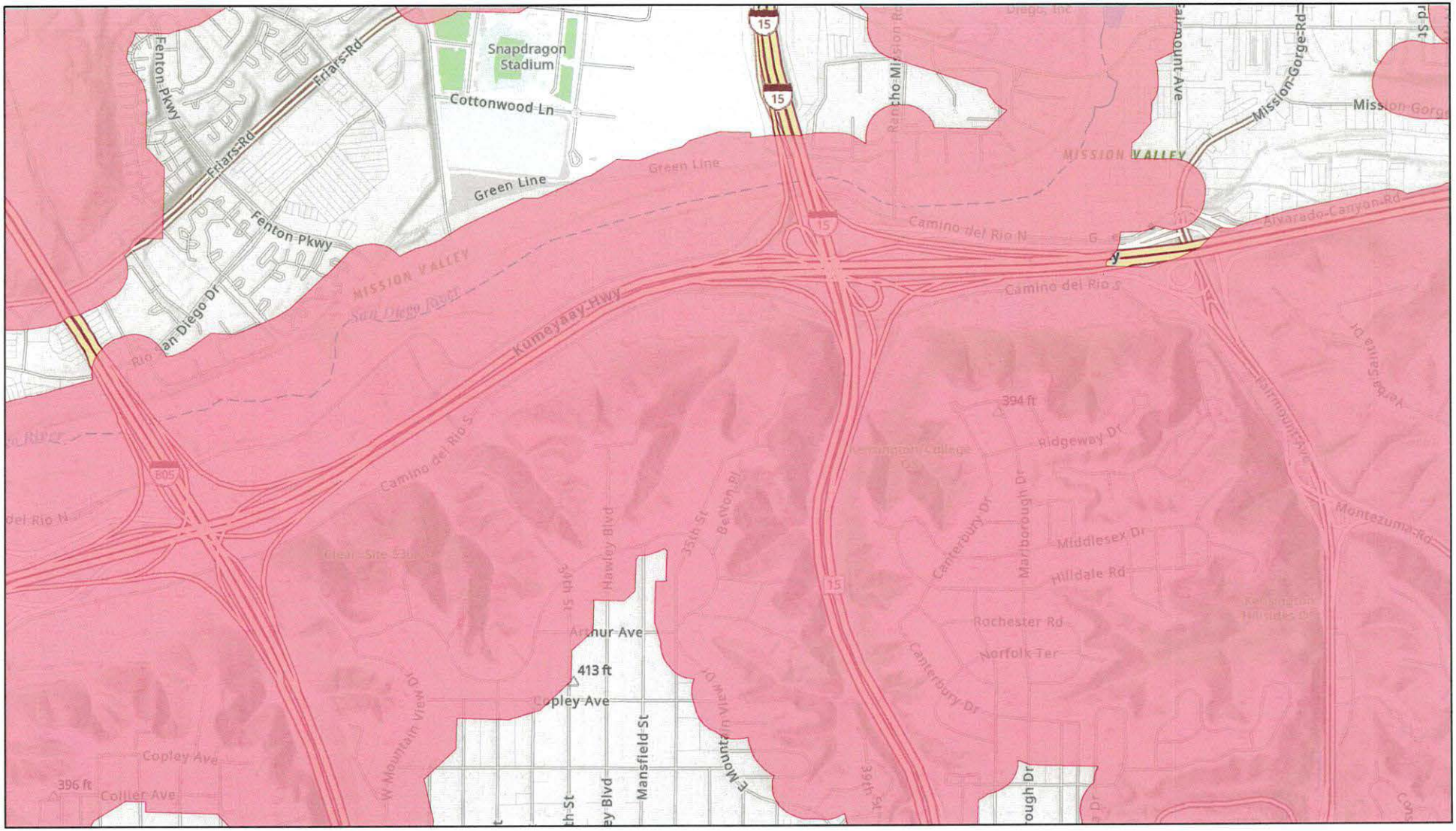
Abi Palaseyed, City of San Diego • Assistant Deputy Director • Strategic Capital Projects Department
Philip Trom, City of San Diego• Program Manager • Sustainability and Mobility Paul Jackson, San Diego State University
Megan Hickey, City of San Diego• Project Officer II/Principal Water Resources Specialist • 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

1:18,056

0 0.13 0.25 0.5 mi

0 0.2 0.4 0.8 km

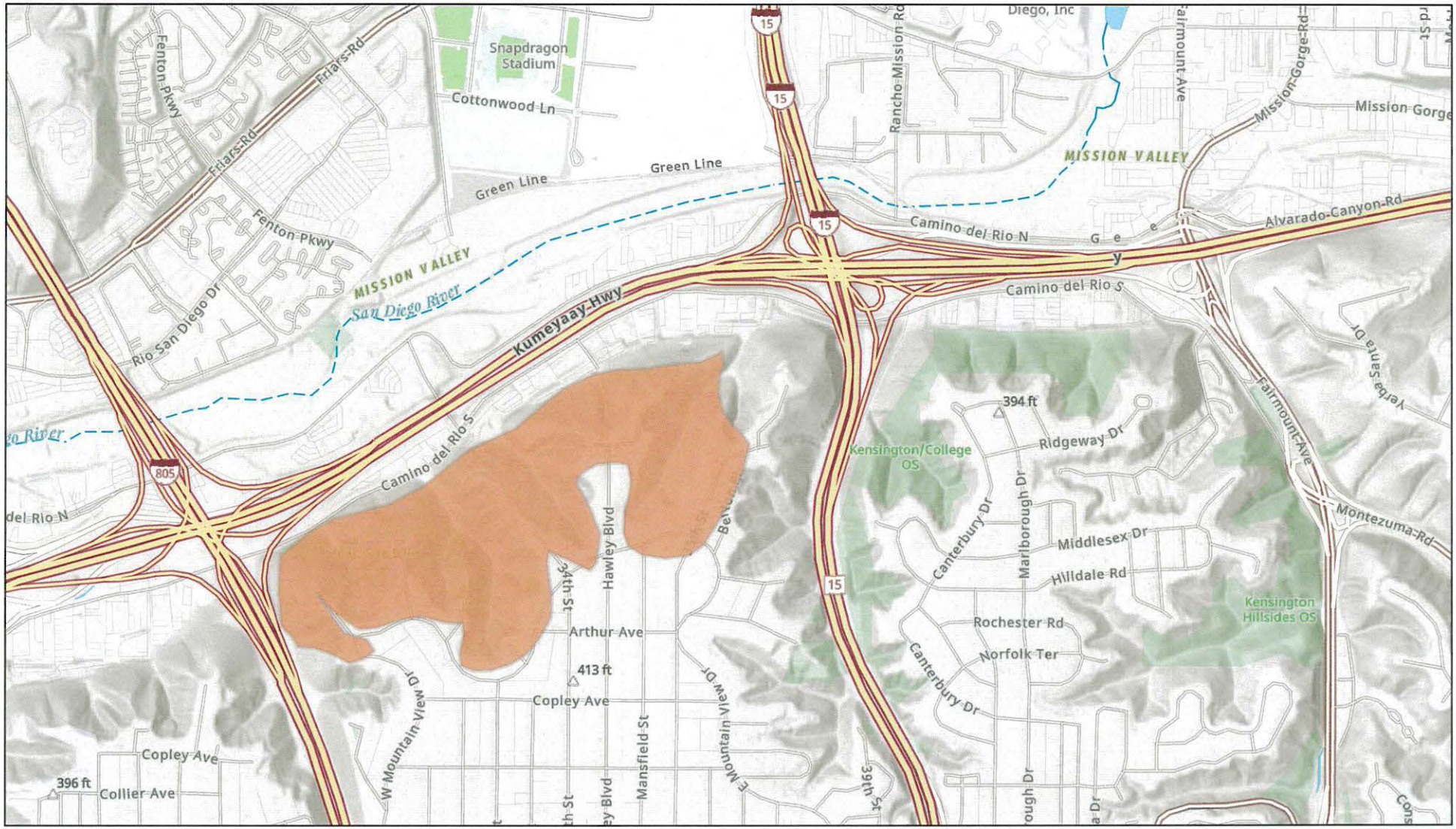
Esri Community Maps Contributors, SanGIS, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, Esri, NASA, NGA, USGS, FEMA

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



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Burn History

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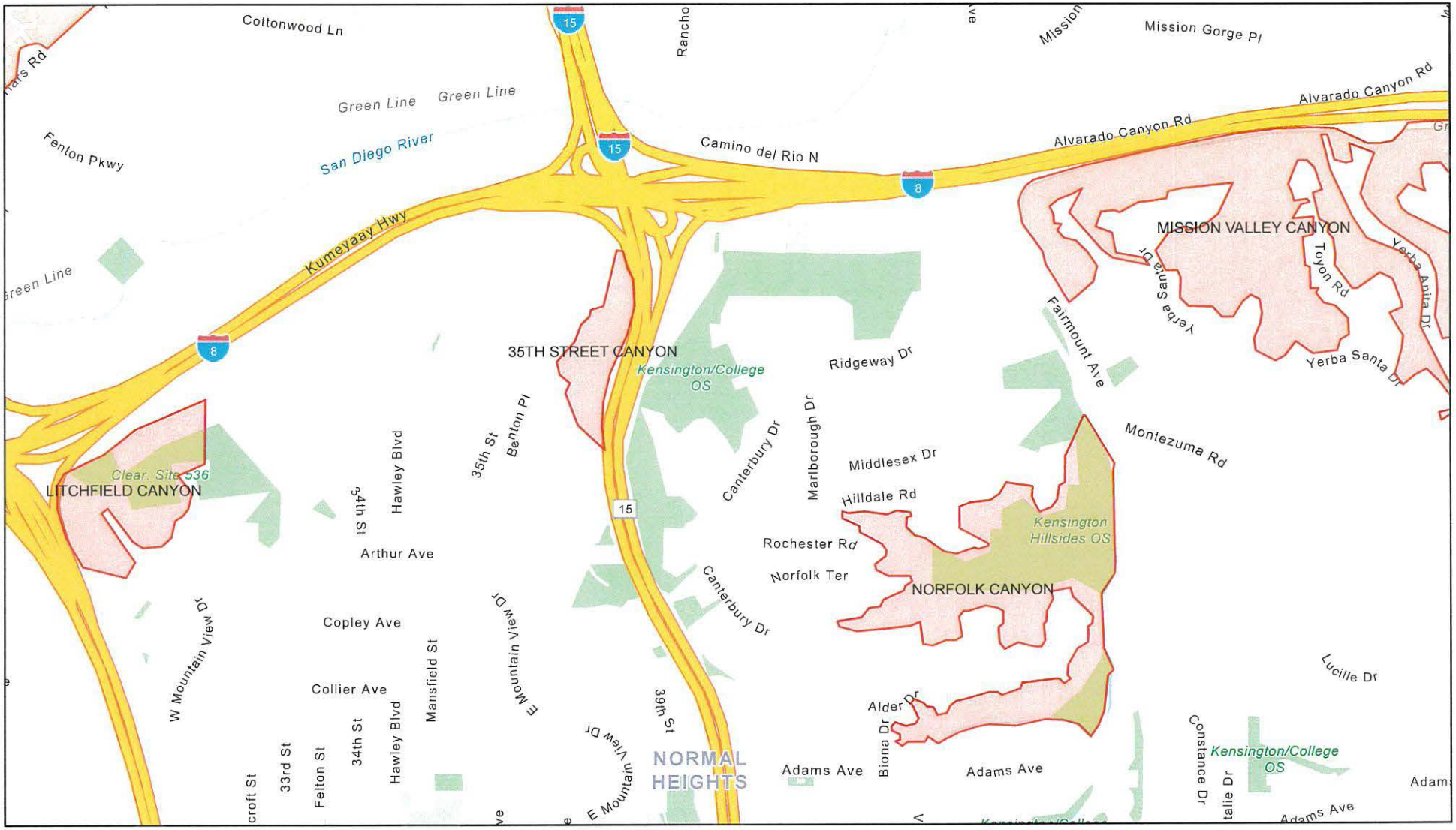
0 0.2 0.4 0.8 km

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

Eco Canyons

ATTACHMENT 3



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ECO CANYONS

1:18,056

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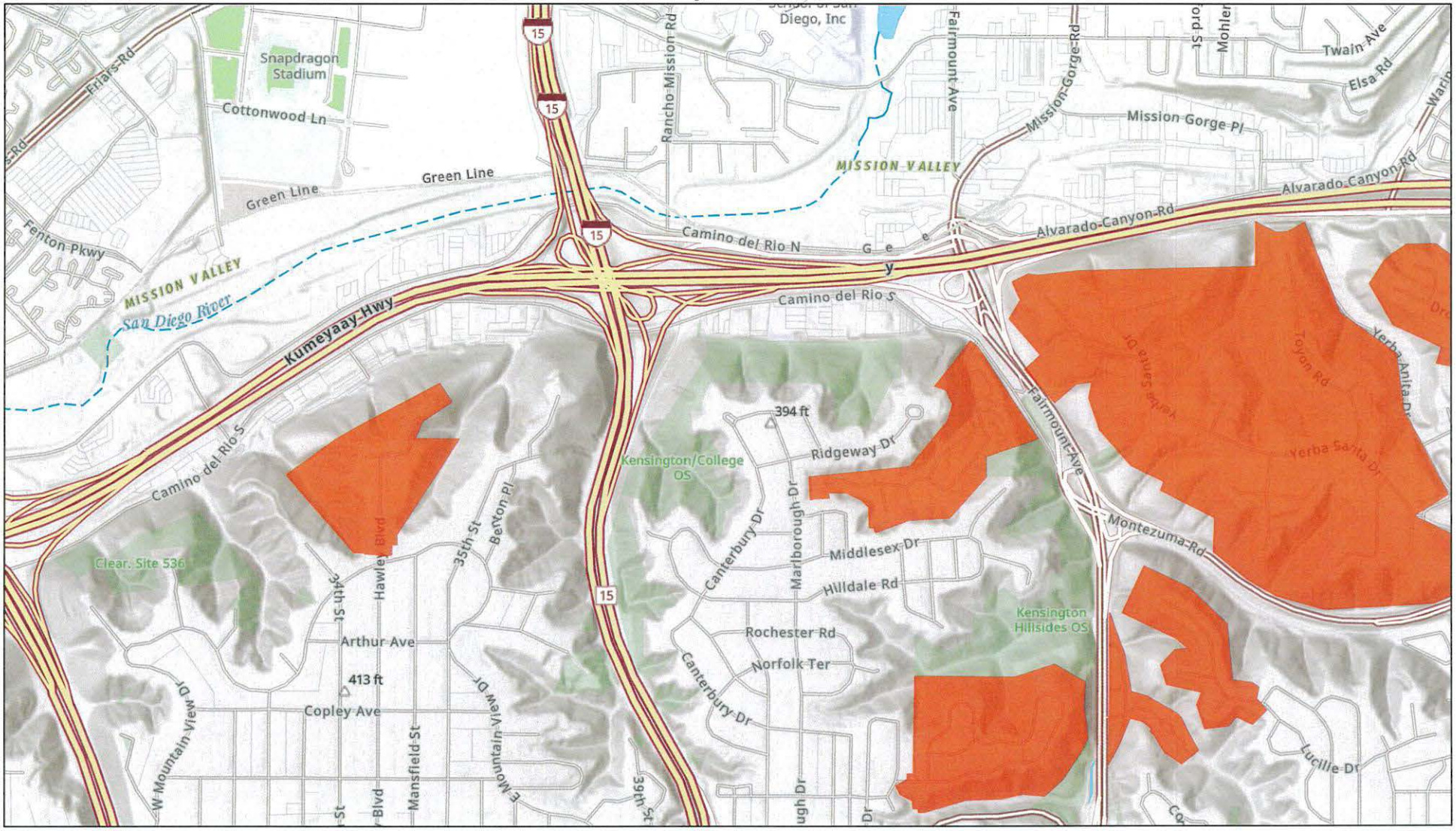
0 0.2 0.4 0.8 km

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

ATTACHMENT 4



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Subdivisions (AB2911)

1:18,056

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0 0.2 0.4 0.8 km

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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