THE CITY OF SAN DIEGO

ENVIRONMENTAL IMPACT REPORT

Project No. PRJ-1066101
SCH No. 2023070270

SUBJECT: **6110 Camino De La Costa**: A Coastal Development Permit and Site Development Permit to demolish an existing historically designated 5,086 square-foot (sf) 2-story residence and construct a new 2-story 8,649 sf residence with a basement located at 6110 Camino de la Costa. The project would also include a pool under the proposed residence and associated site improvements (i.e. hardscape and landscaping). The project would preserve the existing wall along the frontage of the site and detached garage with modifications. The site would be accessible from a new driveway off Camino De La Costa and the project would connect to existing utilities within Camino De La Costa. Drainage would be directed away from the coastal bluff and directed into the existing storm drain system. The proposed project would also include removal of the existing walls and stairs west of the bluff edge and would preserve all portions of the lot west of the bluff edge as Environmentally Sensitive Lands (sensitive coastal bluff) within a Covenant of Easement. The Covenant of Easement would include land use restrictions with the intent to preclude future development and to preserve the area. The 0.37-acre project site is located at 6110 Camino De La Costa in the La Jolla Community Planning Area in the City of San Diego. The project site is zoned as RS-1-5 and designated as Low Density Residential (5-9 du/ac) within the La Jolla Community Plan area. The project site contains Environmentally Sensitive Lands consisting of sensitive coastal bluffs. The project site is also located within overlays including Environmentally Sensitive Lands, Coastal Overlay (Appealable) Zone, Coastal Height Limit Overlay Zone, First Public Roadway Overlay, Parking Impact Overlay Zone, Transit Area Overlay Zone, and Transit Priority Area. (LEGAL DESCRIPTION: Lots 10 and 11, in Block One-A, in La Jolla Hermosa, Map No. 1810). APPLICANT: Matthew Segal.

ENVIRONMENTAL DETERMINATION:

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

Based on the analysis conducted for the project described above, the City of San Diego, as the Lead Agency, has prepared the following Environmental Impact Report. The analysis addressed the following issue area(s) in detail: **Land Use, Historic Resources, Geology, Hydrology, and Water Quality**. The Environmental Impact Report concluded that the project would result in significant and unmitigated impacts to **Land Use and Historic Resources**. All other impacts analyzed in the draft EIR were determined to be less than significant.

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

PUBLIC REVIEW DISTRIBUTION:

The following agencies, organizations, and individuals received a copy or notice of the draft Environmental Impact Report and were invited to comment on its accuracy and sufficiency. Copies of the Environmental Impact Report, the Mitigation Monitoring and Reporting Program and any technical appendices may be reviewed in the offices of the Development Services Department, or purchased for the cost of reproduction.

State of California
State Clearinghouse
California Coastal Commission (47)
Native American Heritage Commission (222)

City of San Diego
Library Dept. - Gov. Documents (81)
Central Library (81A)
La Jolla/Riford Branch Library (81L)

Other Interested Groups, Organizations, and Individuals
Historical Resources Board (87)
South Coastal Information Center (210)
San Diego History Center (211)
San Diego Archaeological Center (212)
Save Our Heritage Organization (214)
San Diego County Archaeological Society, Inc. (218)
La Jolla Village News (271)
La Jolla Town Council (273)
La Jolla Historical Society (274)
Jolla Community Planning (275)
La Jolla Light (280)
La Jolla Shores Association (272)
Patricia K. Miller (283)
Richard Drury
Molly Greene
Tom Cook

Angeles Leira

RESULTS OF PUBLIC REVIEW:

( ) No comments were received during the public input period.

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

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

Jeff Szymanski

Jeff Szymanski
Senior Planner
Development Services Department

May 16, 2024
Date of Draft Report

Date of Final Report

Analyst: Marlene Watanabe

6110 Camino De La Costa Project
Draft Environmental Impact Report

SCH No. 2023070270 | Project No. 1066101

MAY 2024

Prepared for:

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

6110 CAMINO DE LA COSTA PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT

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ABBREVIATIONS AND ACRONYMS

Abbreviation/Acronym	Definition
AB	Assembly Bill
ACM	asbestos-containing material
ADT	average daily trip
AIA	Airport Influence Area
ALUCP	airport land use compatibility plan
AMI	average mean income
APCD	Air Pollution Control District
APN	Assessor's parcel number
Basin Plan	Water Quality Control Plan for the San Diego Basin
BMPs	best management practices
CAC	California Administrative Code
CALGreen	California Green Building Standards
CAP	climate action plan
CARB	California Air Resources Board
CCR	California Code of Regulations
CD	construction document
CDFW	California Department of Fish and Wildlife
CEC	California Energy Code
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
cfs	cubic feet per second
CHRIS	California Historic Resources Information System
City	City of San Diego
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CRHR	California Register of Historic Resources
CUPD	Central Urbanized Planned District
CY	cubic yard
dB	decibel
dBA	A-weighted decibel
DIF	development impact fee
DSD	City of San Diego Development Services Department
DU	dwelling unit
ED	environmental designee
EIR	environmental impact report
ESL	Environmentally Sensitive Lands
GHG	greenhouse gas
HABS	Historic American Buildings Survey
HAP	hazardous air pollutant
HRB	Historical Resources Board
HRTR	historical resources technical report
HVAC	heating, ventilation, and air conditioning
kBtu	thousand British thermal units
KSF	1,000 square feet
kWh	kilowatt-hours
LBP	lead-based paint

Abbreviation/Acronym	Definition
LDC	Land Development Code
Ldn	day-night average level
Leq	equivalent noise level
LMA	local mobility analysis
Lmax	highest RMS sound pressure level within a measuring period
Lmin	lowest RMS sound pressure level within a measuring period
MMC	mitigation monitoring coordination
MHPA	Multi-Habitat Planning Area
MRZ	Mineral Resource Zone
MSCP	Multiple Species Conservation Program
NHPA	National Historic Preservation Act of 1966
NOP	notice of preparation
NO_X	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O_3	ozone
PIF	project information form
PM2.5	fine particulate matter
PM10	respirable particulate matter
PRC	Public Resources Code
project	Casa De Los Amigos Project
RAQS	San Diego County Regional Air Quality Strategy
RE	resident engineer
RMA	root mean squared
ROG	reactive organic gas
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCH	State Clearinghouse
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDFD	City of San Diego Fire-Rescue Department
SDG&E	San Diego Gas & Electric
SDMC	San Diego Municipal Code
SDP	site development permit
SDPD	San Diego Police Department
SDUSD	San Diego Unified School District
SF	square feet
SIP	State Implementation Plan
SO_X	oxides of sulfur
TAC	toxic air contaminant
TNM	traffic noise model
TSM	Transportation Study Manual
USEPA	United States Environmental Protection Agency
VdB	vibration decibel
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
WSA	water supply assessment
WSV	water supply verification

ES. EXECUTIVE SUMMARY

This summary provides a synopsis of the 6110 Camino De La Costa project (project), the results of the environmental analysis, and project alternatives considered in this Environmental Impact Report (EIR). This summary does not provide an extensive background and analysis of the various sections of the EIR. This document analyzes the potential environmental effects associated with the implementation of the project (including direct and indirect impacts, secondary impacts, and cumulative effects). Prepared under the direction of the City of San Diego's Environmental Analysis Section, this EIR reflects the independent judgment of the City of San Diego.

ES.1 Purpose and Scope of the EIR

This EIR has been prepared in accordance with, and complies with, all criteria, standards, and procedures of the California Environmental Quality Act (CEQA) of 1970 as amended (PRC 21000 et seq.), State CEQA Guidelines (CAC 15000 et seq.), and City of San Diego's EIR Preparation Guidelines. Per Section 21067 of CEQA and Sections 15367 and 15050 through 15053 of the State CEQA Guidelines, the City of San Diego is the Lead Agency under whose authority this document has been prepared. As an informational document, this EIR is intended for use by the City of San Diego decision-makers and members of the general public in evaluating the potential environmental effects of the 6110 Camino De La Costa Project.

The project requires a Coastal Development Permit, a Site Development Permit, and a Neighborhood Development Permit. This EIR provides decision-makers, public agencies, and the general public with detailed information about the potential significant adverse environmental impacts of the project. By recognizing the environmental impacts of the project, decision-makers will have a better understanding of the physical and environmental changes that would accompany the implementation of the project. This EIR includes required mitigation measures that, when implemented, would reduce or avoid project impacts to the extent feasible. Alternatives to the project are presented to evaluate feasible alternative development scenarios that can further reduce or avoid any significant impacts associated with the project. Refer to Chapter 8, *Project Alternatives*, for a description of the project alternatives.

The EIR addresses in detail potentially significant direct, indirect, and cumulative environmental impacts associated with the following five (5) topics:

Land Use

Geologic Conditions

Historical Resources

Hydrology

Water Quality

Project impacts with respect to Agriculture and Forestry Resources, Air Quality, Biological Resources, Energy, Greenhouse Gas Emissions, Health and Safety, Mineral Resources, Noise, Paleontological Resources, Population and Housing, Public Services and Facilities, Transportation and Circulation,

Tribal Cultural Resources, Utilities and Service Systems, Visual Effects/Neighborhood Character, and Wildfire are described in Section 7.1, *Effects Found Not to Be Significant*.

ES.2 Project Location, Existing Setting, and Objectives

The 0.37-acre project site contains an existing single-family residence and is located at 6110 Camino De La Costa in the La Jolla Community Planning Area in the City of San Diego. The project site is located adjacent to the Pacific Ocean, 9 miles northwest of downtown San Diego and 2.6 miles west of Interstate 5 (I-5). The project site is located east of the intersection of Camino De La Costa and Avenida Cortez on a coastal bluff in the Lower Hermosa Neighborhood of La Jolla. The project site is bounded by Camino De La Costa to the east, single-family residences to the north and south, and the Pacific Ocean to the west. The project site contains sensitive coastal bluffs and is situated in the Coastal Zone.

The project site contains an existing 5,086-square-foot (SF), 2-story residence and detached garage constructed in 1924. The residence and detached garage (with maid's quarters) are a designated Historic Resource in the City of San Diego Historic Resources Register (Site No. 1481). The existing home is situated adjacent to the unprotected coastal bluff and contains a 1,587 SF basement. The detached garage building is two stories high and features a side-gabled roof. The structural integrity of the existing home shows significant deterioration, including evidence of cracking of concrete walls, which appears to indicate some settlement/building movement and grade beams and columns show significant damage and deterioration.

The objectives associated with the 6110 Camino De La Costa Project (project) are as follows:

- Provide a structurally secure single-family residence, which preserves, to the extend feasible, the designated historical resource or portions thereof.
- Develop a project that is consistent with the goals and policies of the *La Jolla Community Plan and Local Coastal Program Land Use Plan to the maximum extent feasible.*
- Propose a design that achieves a harmonious visual relationship between the bulk and scale of the existing and adjacent residences.

ES.2.1 Site Plan and Design Features

The project would demolish the entire existing residential structure and hardscape and preserve and rehabilitate consistent with the Secretary of the Interior's Standards a 499 SF historic wood stucco garage structure and the adjacent stucco front yard privacy wall and entries along the street frontage with Camino De La Costa. The new residential structure would be placed adjacent to and west of the rehabilitated garage structure and stucco wall features.

As recommended in the geotechnical investigation assessing long-term bluff retreat over the economic lifespan of the residence, a design exception to the 40-foot coastal bluff setback required by the Environmentally Sensitive Lands regulations is proposed to reduce the coastal bluff setback to 25 feet. All structures and other site improvements, except landscaping, would be set back a minimum of 25 feet from the coastal bluff edge. All existing improvements, including but not limited

to the existing stone walls, walkway, and staircase located on the existing coastal bluff face, would be removed by the project. No physical shoreline protection improvements are proposed.

The site plan and architectural drawings incorporate modifications for the driveway width and visibility triangles to accommodate the existing historically designated garage, which is not in conformance with SDMC development regulations.

The new residential structure would be placed on-site to allow for the creation of a 7-foot-1-inch-wide, deed-restricted view corridor with an easement to be recorded along the northern property line. Along the southern property line, where the existing historic garage is to be maintained, a deed-restricted view corridor of 1 foot 3 inches will also be established through a recorded easement. A visually permeable fence would replace short sections of the existing stucco privacy wall to facilitate views through the corridors. A covenant of easement (COE) would be recorded over the portion of the site westward of the coastal bluff to mean high tide, to protect on-site coastal resources.

ES.2.2 Earthwork

All grading would be conducted under the footprint of the proposed structure (i.e., 0.17 acre). Project construction would require 150 cubic yards of native soil excavation, 1,005 cubic yards of artificial fill removal, and 20 cubic yards of fill placement, resulting in a net export of 1,135 cubic yards. The artificial fill on site is at a depth of 6 to 8 feet and would be completely removed during project grading operations. All soil material excavated from the project site would be exported offsite to a proper disposal location. The maximum depth of cut would be 12 feet, while the maximum fill depth would be 3 feet. No earthwork would be conducted within the 25-foot bluff setback.

ES.2.3 Areas of Controversy

The Notice of Preparation (NOP) is intended to encourage interagency communication regarding the project so that agencies, organizations, and individuals are afforded an opportunity to respond with specific comments and/or questions regarding the scope and content of the EIR to be prepared. The NOP for the EIR was distributed on July 17, 2023, for a 30-day public review and comment period.

Comment letters received during the NOP public scoping period expressed concern regarding tribal cultural resources, historical resources, and coastal bluffs. These concerns have been identified as areas of known controversy and are analyzed in Chapter 5.0, Environmental Analysis, of this EIR. Appendix A, Notice of Preparation, and Notice of Preparation Comments include a copy of the NOP and letters received during its review.

ES.3 Environmental Analysis

This EIR contains an environmental analysis of the potential impacts associated with implementation of the proposed project. The issues that are addressed in detail in the EIR include Land Use, Historical Resources, Geology, Hydrology, and Water Quality. Based on the analysis contained in Chapter 5, Environmental Analysis, the project would result in the potential for significant impacts to Land Use (conflicts with the environmental goals, objectives, and recommendations of the community plan or General Plan), Historical Resources (adverse physical or aesthetic effects and/or

the destruction of a historic building). Measures have been identified in Chapter 5 that would reduce these project impacts. Project impacts to Geology, Hydrology, and Water Quality would be less than significant, as described in Chapter 5, and as such, no mitigation for Geology, Hydrology, and Water Quality impacts would be required.

Chapter 6, Cumulative Impacts, addresses the cumulative impacts due to implementation of the proposed project in combination with past projects and future development projections. As described in Chapter 6, the project would contribute to cumulatively considerable effects for Land Use and Historical Resources. The project would not contribute to cumulatively considerable effects for Geology, Hydrology, and Water Quality.

As explained in Section 7.1, Effects Found Not to Be Significant, the project would not have the potential to cause significant impacts for the following 16 issue areas: Agriculture and Forestry Resources, Air Quality, Biological Resources, Energy, Greenhouse Gas Emissions, Health and Safety, Mineral Resources, Noise, Paleontological Resources, Population and Housing, Public Services and Facilities, Transportation and Circulation, Tribal Cultural Resources, Utilities and Service Systems, Visual Effects/Neighborhood Character, and Wildfire.

Table ES-1: Proposed Impacts and Proposed Mitigation provides a summary of project impacts.

ES.4 Project Alternatives

Based on the analysis contained in Chapter 5, *Environmental Analysis*, the project would result in significant impacts to land use (i.e., General Plan and Community Plan policy inconsistency related to preservation of a historical resource) and historical resources (i.e., direct impact to a historically significant structure resulting in an inconsistency with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*). Mitigation measures have been identified that would reduce impacts to the historic structure to the extent feasible; however, because the project would result in the demolition of the existing residence, and the demolition of a historic structure cannot be mitigated to a less than significant level, impacts to land use and historic resources would remain significant.

In accordance with CEQA Guidelines Section 15126.6(c), four project alternatives were considered but rejected and three project alternatives are addressed in detail in this report.

ES.4.1 Alternates Considered But Rejected

ES.4.1.1 Alternate Project Location Alternative

Off-site alternatives should be considered if the development of another site is feasible and if the development of another site would substantially lessen or avoid the significant impacts of the project. Factors that need to be considered when identifying an off-site alternative include the size of the site, its location, the General Plan (or other applicable planning document) land use designation, availability of infrastructure, and whether or not the applicant can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). More specifically, this project is a single-family residence that is owned and will be

occupied by the project applicant. The applicant ownership limits the implementation of the project on other parcels.

The search area for an alternative project location includes the Lower Hermosa neighborhood, Windansea Beach neighborhood to the north, the Beach Barber Tract neighborhood to the east, and the Bird Rock neighborhood to the south. A review of the surrounding neighborhoods did not reveal any available bluff-top properties. However, a few remaining available properties were inland from the bluff but west of La Jolla Boulevard. The majority of the remaining available properties are located on flat topography. Therefore, the proposed house would need to be substantially redesigned in order to have a different foundation.

The Alternate Project Location Alternative would meet the project objectives. Specifically, it would provide a structurally secure single-family residence and would preserve the designated historical resource. This alternative would also be consistent with the goals and policies of the La Jolla Community Plan and Local Coastal Program Land Use Plan, and would create a harmonious visual relationship between the bulk and scale of the existing and adjacent residences. However, there are no available properties within the neighborhood or surrounding neighborhoods that would allow for implementation of the Alternative Project Location Alternative. Because there are no other reasonable alternative locations for the Project, an alternate project location was not studied further.

ES.4.1.2 Relocation Alternative

An investigation was conducted to explore an alternative option to relocate the Casa De Los Amigos historical resource to an appropriate site within La Jolla's Lower Hermosa neighborhood for rehabilitation and reuse. However, a thorough search of the Lower Hermosa neighborhood revealed that there are no available oceanfront properties that could accommodate the structures. Therefore, this alternative would require the acquisition of a property with existing development and the demolition of the existing home on that site to make way for the relocation of Casa De Los Amigos. The relocation process would require the residence to be segmented for transport. Four occupied properties in the Lower Hermosa neighborhood were for sale as of November 2023, and they were reviewed by the applicant to determine their adequacy as a relocation site for Casa De Los Amigos.

Due to the footprint and multi-level stepped configuration of the existing historic residence, a relocation lot would require sloped terrain to accommodate the layout and footprint of the Casa De Los Amigos residence. However, the applicant determined that it is highly unlikely that the available sites would feature sloping terrain that could accommodate the existing residence without substantial reconfiguration of the structure. Furthermore, oceanfront homes in the Lower Hermosa neighborhood would likely share a similar constraint as the project site, with reduced bluff edge setbacks and the existing home's proximity to the bluff edge. In consideration of these factors, the Relocation Alternative was not considered for further analysis.

ES.4.1.3 Structural Repair Alternative

The Structural Repair Alternative would entail retaining the existing historic structure at its current location along the coastal bluff edge and implementing repairs to address the existing structural and

foundation conditions documented by the structural engineer (DCI Engineers, 2023). Under this alternative, the structure would be rehabilitated to habitable standards such that the historic improvements could be retained.

As documented in the structural engineering study referenced in Section 5.2, *Geologic Conditions*, the structural integrity of the existing residence shows significant deterioration, including evidence of cracking of concrete walls which appears to indicate some settlement/building movement and grade beams and columns show significant damage. The grade beam and column foundation structure is showing signs of substantial corrosion and deterioration in a large percentage of structural elements. Some beams are in advanced stages of flexural failure and appear to be deflecting to and resting upon soil. Other beams are exhibiting shear cracks and are in various stages of failure. Multiple columns have substantial spalling (i.e., breaking off in fragments or into smaller pieces) and corrosion in reinforcing and could begin to fail in compression as spalling continues or in shear in a seismic event. While a complete failure of any element may not be imminent, the substructure is in a stage of significant distress which would eventually result in structural failure. According to the structural engineering study, approximately 60 to 70 percent of the lateral or vertical load systems necessitate complete removal and replacement due to the current condition of the structure and the need to embed all new structural systems securely into the native soil per the recommendations of the Geotechnical Investigation (DCI Engineers, 2023). Although previously conforming and not required to comply with the current coastal bluff setback requirements codified in the San Diego Municipal Code (SDMC), the extent of site work necessary to repair and rehabilitate the building to address the the unsafe structural conditions would terminate the previously conforming status (pursuant to SDMC Section 127.0104(e)(2)), thereby making the structure non-conforming by reason of its proximity to the coastal bluff. Therefore, the Structural Repair Alternative was not considered for further study.

ES.4.1.4 Partial Removal Alternative

The Partial Removal Alternative would involve the partial removal of the portions of the existing single-family residence within the standard 40-foot coastal bluff setback. The remaining portions of the existing single-family residence would be rehabilitated to habitable standards. This alternative would require the removal of approximately 73 percent of the residence's habitable square footage and would include the removal of two existing bedrooms, a living room, a family room, a dining room, and a kitchen. Due to the "U" shape of the residence, the removal of the portion of the structure within the 40-foot coastal bluff setback would result in the remaining portions of the residence consisting of two separate structures, the north and south wings of the residence. The removal of the portion of the structure within the 40-foot coastal bluff setback would result in a large reduction in habitable space for the residence, with a total remaining occupiable space of 1,453 square feet (SF). The large reduction of occupiable space, combined with the remaining structure being divided into two parts, would greatly hamper the residence's functionality.

ES.4.2 Alternates Considered

ES.4.2.1 No Project/No Development Alternative

Consideration of a no project alternative is required by CEQA Guidelines Section 15126.6(e). The analysis of a no project alternative must discuss the existing conditions at the time the Notice of

Preparation was published (i.e., July 17, 2023), as well as "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services" [CEQA Guidelines Section 15126.6(e)(2)]. The requirements also specify that, "If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed" [CEQA Guidelines Section 15126.6(e)(3)(B)]. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving a project with the impacts of not approving the project.

Because this alternative would not result in a new residence or improvements on the existing project site, this alternative would not achieve the project's objectives related to providing a structurally secure single-family residence, which preserves, to the extent feasible, the designated historical resource or portions thereof, developing a project consistent with the goals and policies of the La Jolla Community Plan and Local Coastal Program Land Use Plan, and proposing a design that would create a harmonious visual relationship between the bulk and scale of the existing and adjacent residences.

ES.4.2.2 On-Site Relocation and Partial Removal Alternative

The On-Site Relocation and Partial Removal Alternative would relocate the portion of the single-family residence that is within the 40-foot coastal bluff setback to the portion of the site outside of the 40-foot setback. Relocating the portion of the building that is within the 40-foot coastal bluff setback would require partial demolition of the structure, consisting of all portions of the structure that are outside of the 40-foot coastal bluff setback (consisting of sections of the north and south wings of the residence). The removal of this portion of the structure would allow for relocation of the portion of the structure that is currently within the 40-foot coastal bluff setback, to outside of the 40-foot coastal bluff setback. This alternative would also rehabilitate the relocated historic building section to current building standards. This alternative would remove the front door, courtyard with fountain, lower one-story portions of the residence flanking each side of the entry way, the archways along the northern and southern sides of the entryway, and forecourt. The dormer portion of the structure would be moved closer to the garage. New foundations, excavation, retaining walls and sitework would be required.

The On-Site Relocation and Partial Removal Alternative would meet all of the project objectives. Specifically, it would provide a structurally secure single-family residence, which preserves, to the extent feasible, the designated historical resource or portions thereof. This alternative would also be consistent with the goals and policies of the La Jolla Community Plan and Local Coastal Program Land Use Plan with the exception of the policies related to historic preservation, and would create a harmonious visual relationship between the bulk and scale of the existing and adjacent residences.

ES.4.2.3 On-Site Relocation and New Structure Alternative

The On-Site Relocation and New Structure Alternative would require relocating the portion of the building that is within the 40-foot coastal bluff setback would require partial demolition of the structure, consisting of all portions of the structure that are outside of the 40-foot coastal bluff setback (consisting of sections of the north and south wings of the residence). These wings currently house the living room, family room, dining room and kitchen. The removal of this portion of the

structure would allow for relocation of the portion of the structure that is currently within the 40-foot coastal bluff setback, to outside of the 40-foot coastal bluff setback.

The On-Site Relocation and New Structure Alternative would meet all of the project objectives. Specifically, it would provide a structurally secure single-family residence, which preserves, to the extent feasible, the designated historical resource or portions thereof. This alternative would also be consistent with the goals and policies of the La Jolla Community Plan and Local Coastal Program Land Use Plan with the exception of the policies related to historic preservation, and would create a harmonious visual relationship between the bulk and scale of the existing and adjacent residences.

ES.4.2.4 25-Foot Setback Alternative

The 25-foot Setback Alternative would require new foundations, excavation, retaining walls, and sitework to implement the removal of existing structures and construction of new structures. The removal of the portion of the home west of the 25-foot setback would leave a new structural edge of the existing structure to be modified for both shear and gravity loads. While part of the original structure would be maintained, the existing footings and grade beams would be required to be repaired to accommodate the second-story addition. The existing stone walls, walkway, and staircase located along the existing bluff would be removed. Consistent with the proposed project, a Covenant of Easement will be recorded to preserve all Environmentally Sensitive Land west of the 25-foot bluff setback. The historic wood framed garage structure with stucco finish and front yard privacy wall with stucco finish and entries along the street frontage would be retained and rehabilitated. The garage structure, as proposed, would be modified to accommodate the required on-site parking.

The 25-foot Setback Alternative would meet all of the project objectives. Specifically, it would provide a structurally secure single-family residence, which preserves, to the extent feasible, the designated historical resource or portions thereof. This alternative would also be consistent with the goals and policies of the *La Jolla Community Plan* and *Local Coastal Program Land Use Plan*, with the exception of the policies related to historic preservation, and would create a harmonious visual relationship between the bulk and scale of the existing and adjacent residences.

ES.4.3 Summary of Project Alternatives

The project alternatives discussed in this section are intended to avoid or substantially lessen one or more of the significant impacts identified for the project below a level of significance. A summary comparison of impact levels for the issues identified as significant under the project is provided in **Table 8-2**, *Project Alternatives Summary of Impacts*. Based on that information and the discussions in Sections 8.4.1 through 8.4.3, the No Project/No Development Alternative is the environmentally superior alternative, as it would eliminate all of the project impacts, including the significant land use and historical resources impacts. Pursuant to CEQA Guidelines Section 15126.6(e)(1), if the "no project" alternative is the environmentally superior alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. In this case, the On-Site Relocation and Partial Removal Alternative would be the environmentally superior alternative among the three remaining alternatives. Specifically, the On-Site Relocation and Partial Removal Alternative would retain the largest portion of the existing residence and would relocate the retained portion outside of the 40-foot coastal bluff setback. While this alternative would result in

the partial retention of the existing historic structure, the partial removal and relocation would alter the integrity of the resource and would still result in a significant impacts to historic resources and the associated significant land use impact related to the conflict with historic preservation policy.

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Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION

Impact	Mitigation Measures	Analysis of Significance after Mitigation
Land Use		
The project would result in significant impacts related to conflicts with the environmental goals, objectives, and recommendations of the Historic Preservation Element of the General Plan and Heritage Resources Element of the La Jolla Community Plan.	Refer to Mitigation Measures below.	Significant
Historical Resources		
The project would result in significant adverse impacts to a designated historical resource pursuant to CEQA Section 21084.1.	**HR-1: Historic American Building Survey (HABS) Documentation.** Prior to issuance of a demolition permit for the residence, Casa De Los Amigos shall be documented to Historic American Building Survey (HABS) Level II standards according to the outline format described in the *Historic American Building Survey Guidelines for Preparing Written Historical Descriptive Data*. The documentation shall be undertaken by a qualified professional who meets the Secretary of the Interior's *Professional Qualification Standards* (36 CFR, part 61) for history or architectural history. The documentation shall contain the following: 1. *Measured Drawings:* Drawings produced according to HABS guidelines depicting existing conditions or other relevant features of historic buildings, sites, structures, objects, or landscapes. 2. *Photographic Documentation:* Documentation should follow the Photographic Specification–Historic American Building	Significant

	Survey, including 15 to 20 archival quality, large-format photographs of the exterior and interior of the building and its architectural elements. Construction techniques and architectural details should be documented, especially noting the measurements, hardware, and other features that tie architectural elements to a specific date. 3. *HABS Historical Report:* A written historical narrative and report completed according to the HABS Historical Report Guidelines. Following completion of the HABS documentation and approval by the HRB, the documentation shall be placed on file with the City of San Diego, the San Diego History Center, and the San Diego Central Library. **HR-2:** **Salvage.** Prior to the issuance of a demolition permit for the project, architectural materials from the site shall be made available for donation to the public. Material to become architectural salvage shall include historic-period elements, including the original clay roof tiles and the decorative medallions at the roofline of the main structure. The key exterior and interior elements inventory shall be developed before the demolition or grading permit issuance. The materials shall be removed prior to or during demolition. Contaminated, unsound, or decayed materials shall not be included in the salvage program nor be available for future use. Once the items for salvage are identified, the project applicant's qualified historic preservation professional (QHPP) shall submit this information to the City's Historical Resource Section for approval. Salvaged material will be first used to replace any damaged pieces on the garage or site wall rehabilitation as required. Following that, the QHPP, in concert with the City's Historical Resources Section, shall notify the La Jolla Community Planning Group, the La Jolla Historic Society, the University of California, San Diego Historical Archives, and local	

	preservation groups via email concerning the availability of the salvaged materials. Interested parties shall make arrangements to pick up the materials after they have been removed from the property. The project applicant shall be responsible for storing the salvaged materials in an appropriate climate-controlled storage space for an appropriate period of time, as determined through consultation with the City's Historical Resources Section. Prior to any plans to no longer use the storage space, the applicant shall provide the City's Historical Resources Section with an inventory of any materials that were not donated to any interested parties and measures to be taken by the project applicant to dispose of these materials. **HR-3: Rehabilitation Work and Monitoring Plan.** Rehabilitation work shall be overseen by a construction monitor trained in the protection of historic structures. Rehabilitation work on the detached garage and stucco privacy wall shall adhere to *U.S. Secretary of the Interior Standards for Rehabilitation and will be documented in a treatment plan. The treatment plan will consist of drawings detailing the rehabilitation work and an accompanying narrative approved by the HRB and City Heritage Preservation staff*. Prior to the start of rehabilitation work, a monitoring plan shall be prepared by the project proponent and submitted to the City Development Services Department for review and approval. The monitoring plan shall designate a qualified historic monitor and set forth a plan for protecting the historic elements of the project that would be retained during construction and rehabilitation activities. The treatment plan and monitoring plan shall detail the proposed rehabilitation work for the project, with steps identified for each portion of the preparation, rehabilitation, and restoration of the detached garage and stucco privacy wall. **HR-4: Interpretation Plaque (or Display Panels or Story Board).** Interpretive signage display panels or storyboards shall be installed in a publicly visible location, near the northern corner of	

	the property, in the public sidewalk right-of-way. The installation shall describe the history and significance of Casa De Los Amigos under Criteria A, B, C, and D. The installation shall be reviewed and approved by the City's Historical Resources Board Staff.	

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1. INTRODUCTION

1.1 Purpose and Legal Authority

This Environmental Impact Report (EIR) is an informational document intended for use by the City of San Diego (City) decision-makers and members of the general public in evaluating the potential environmental effects of the 6110 Camino De La Costa Project (project). This document has been prepared in accordance with, and complies with, all criteria, standards, and procedures of the California Environmental Quality Act (CEQA) of 1970 as amended [Public Resources Code Section 21000 et seq.], CEQA Guidelines [California Code of Regulations (CCR) Section 15000 et seq.], and the City of San Diego's Environmental Impact Report Preparation Guidelines (2005). This document represents the independent judgment of the City as a lead agency (CEQA Guidelines Section 15050).

In accordance with CEQA Guidelines Section 15161 and as determined by the City, this document constitutes a "Project EIR." The project consists of the demolition of an existing historically designated (San Diego Historic Resource Site No. 1481), 5,086-square-foot (SF), two-story residence with below-grade basement and the construction of an 8,649 SF, two-story residence with a single subterranean level (i.e., basement) for a total of three levels. The new construction would occur on a single, 16,058 SF (0.37-acre) parcel located at 6110 Camino De La Costa in the La Jolla Community Planning Area of the City of San Diego. The project would demolish the entire existing residential structure and hardscape and rehabilitate a 499 SF historic wood stucco garage structure and stucco front yard privacy wall and entries along the street frontage. The four required resident and guest parking spaces would be provided within the rehabilitated garage structure via a mechanical car lift designed to provide vehicles on demand. Refer to Chapter 3, *Project Description*, for a full description of the project and its features.

The project requires a Coastal Development Permit, a Site Development Permit, and a Neighborhood Development Permit. This EIR provides decision makers, public agencies, and the general public with detailed information about the potential significant adverse environmental impacts of the project. By recognizing the environmental impacts of the project, decision makers will have a better understanding of the physical and environmental changes that would accompany the implementation of the project. This EIR includes required mitigation measures that, when implemented, would reduce or avoid project impacts to the extent feasible. Alternatives to the project are presented to evaluate feasible alternative development scenarios that can further reduce or avoid any significant impacts associated with the project. Refer to Chapter 8, *Project Alternatives*, for a description of the project alternatives.

1.2 EIR Scope

The public agency with the greatest responsibility for supervising or approving the project or the first public agency to make a discretionary decision to proceed with a proposed project should ordinarily act as the "lead agency" pursuant to CEQA Guidelines Section 15051(b)(1). The City is the lead agency for the project evaluated in this EIR.

This EIR contains a project-level analysis described in detail in Chapter 3, *Project Description*. A project EIR should "focus primarily on the changes in the environment that would result from the development project," and "examine all phases of the project, including planning, construction and operation" (CEQA Guidelines Section 15161). This EIR evaluates the potential short-term (during construction), long-term (post-construction), direct, indirect, and cumulative environmental impacts associated with the construction and operation of the project.

1.2.1 Notice of Preparation

CEQA establishes mechanisms whereby the public and affected public agencies can be informed about the nature of the project being proposed and the extent and types of impacts that the project and its alternatives would have on the environment should the project or alternatives be implemented. Pursuant to CEQA Guidelines Section 15082, the City circulated a notice of preparation (NOP), dated July 17, 2023, to interested agencies, organizations, and individuals. The NOP was also sent to the State Clearinghouse (SCH) at the California Governor's Office of Planning and Research. SCH assigned a state identification number (SCH No. 2023070270) to this EIR.

The NOP is intended to encourage interagency communication regarding the project so that agencies, organizations, and individuals are afforded an opportunity to respond with specific comments and/or questions regarding the scope and content of the EIR to be prepared.

Comment letters received during the NOP public scoping period expressed concern regarding tribal cultural and historical resources. The Executive Summary of this EIR has identified these concerns as areas of known controversy. A copy of the NOP and letters received during its review are included in Appendix A, Notice of Preparation, *and Notice of Preparation Comments*.

The EIR addresses in detail potentially significant direct, indirect, and cumulative environmental impacts associated with the following five topics:

- Land Use
- Geologic Conditions
- Historical Resources
- Hydrology
- Water Quality

Project impacts with respect to Agriculture and Forestry Resources, Air Quality, Biological Resources, Energy, Greenhouse Gas Emissions, Health and Safety, Mineral Resources, Noise, Paleontological Resources, Population and Housing, Public Services and Facilities, Transportation and Circulation, Tribal Cultural Resources, Utilities and Service Systems, Visual Effects/Neighborhood Character, and Wildfire are described in Section 7.1, *Effects Found Not to Be Significant*.

1.2.2 Project Baseline

CEQA Guidelines Section 15125 requires an EIR to include a description of the physical environmental conditions (i.e., environmental setting) for the project at the time the NOP is published. This environmental setting will normally constitute the baseline physical conditions by

which a lead agency determines whether an impact is "significant." Baseline conditions for the project are the fully developed and historically occupied site as established in Chapter 2, *Environmental Setting*.

1.3 Public Review Process

This EIR and the technical analyses it relies on are available for review by the public and public agencies for up to 45 days starting on May 16, 2024, to provide comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (CEQA Guidelines Section 15204). The Draft EIR and associated technical appendices are posted on the City's website:

http://www.sandiego.gov/ceqa/draft

The City, as lead agency, will consider the written comments received on the Draft EIR and comments made at the public hearing in making its decision whether to certify the EIR as complete and in compliance with CEQA, and whether to approve or deny the project, or take action on a project alternative. In the final review of the project, environmental considerations, as well as economic and social factors, will be weighed to determine the most appropriate course of action. Subsequent to certification of the EIR, agencies with permitting authority over all or portions of the project may use the EIR to evaluate environmental effects of the project, as they pertain to the approval or denial of applicable permits.

CEQA Guidelines Section 15381 defines a responsible agency as all public agencies, other than the lead agency, that have discretionary approval power over the project. CEQA Guidelines Section 15386 defines a trustee agency as a state agency having jurisdiction by law over natural resources affected by a project, which are held in trust for the people of the state of California.

1.4 Content and Organization of the EIR

The content and organization of this EIR are in accordance with the most recent guidelines and amendments to CEQA and the CEQA Guidelines. Technical studies have been summarized within individual environmental issue sections and/or summary sections, and full technical studies have been included in the appendices to this EIR and are available for review during the public comment period.

This EIR has been organized in the following manner:

- The *Executive Summary*, provided at the beginning of the EIR, outlines the conclusions of the environmental analysis and a summary of the project as compared to the alternatives analyzed in this EIR. The Executive Summary also includes a table summarizing all identified environmental impacts, along with the associated mitigation measures proposed to reduce or avoid each impact. In addition, this section includes a discussion of areas of controversy known to the City, including those issues identified by other agencies and the public.
- Chapter 1, *Introduction*, provides an overview of the EIR, introducing the project, applicable environmental review procedures, and format of the EIR.
- Chapter 2, *Environmental Setting*, provides a description of the project location, an overview of the regional and local setting, and the physical characteristics (or baseline conditions) of the

project site. The setting discussion also addresses the relevant planning documents and existing land use designations of the project site.

- Chapter 3, *Project Description*, provides a detailed description of the project, including its purpose, main objectives, project design characteristics, including the site plan, architectural design, and landscape concept plan, and project construction. In addition, a discussion of discretionary actions required for project implementation is included.
- Chapter 4, *History of Project Changes*, chronicles the changes made to the project design in response to environmental concerns raised during the City's review of the project application.
- Chapter 5, *Environmental Analysis*, provides a detailed impact analysis for each environmental issue addressed in detail. For each topic, there is a discussion of existing conditions, the thresholds identified for the determination of significant impacts, and an evaluation of the impacts associated with implementation of the project. Where the impact analysis demonstrates the potential for a significant adverse impact on the environment, mitigation measures that would minimize the significant effects are provided. The EIR indicates whether the mitigation measures would reduce impacts to below a level of significance.
- Chapter 6, *Cumulative Impacts*, addresses the cumulative impacts due to implementation of the project in combination with past projects and future development projections. The area of potential effect for cumulative impacts varies depending upon the type of environmental issue.
- Chapter 7, *Other CEQA Sections*, addresses effects found not to be significant wherein the text briefly discusses environmental issues determined not to have the potential for significant adverse impacts as a result of the project. The section further addresses significant unavoidable impacts of the project, including those that can be mitigated but not reduced to below a level of significance; significant irreversible environmental changes that would result from the project, including the use of nonrenewable resources; and growth inducement.
- Chapter 8, *Project Alternatives*, provides a description and evaluation of alternatives to the project. This section addresses the mandatory "No Project" alternative, as well as development alternatives that would reduce or avoid the project's significant impacts.
- Chapter 9, *Mitigation Monitoring and Reporting Program*, contains the mitigation monitoring and reporting program (MMRP) for the project.
- Chapter 10, *References Cited*, contains the source materials and document references relied upon in the EIR analysis.
- Chapter 11, *Certification*, lists all individuals who participated in the preparation of this EIR.

2. ENVIRONMENTAL SETTING

This section provides a description of the existing physical conditions for the project site, as well as an overview of the planning context. Details relative to the environmental setting for each environmental issue are provided at the beginning of each impact area presented in Chapter 5, *Environmental Analysis*.

2.1 Project Location

The 0.37-acre project site contains an existing single-family residence and is located at 6110 Camino De La Costa (Assessor's Parcel Number [APN] 357-141-05) in the La Jolla Community Planning Area in the City of San Diego. The project site is located adjacent to the Pacific Ocean, 9 miles northwest of downtown San Diego, and 2.6 miles west of Interstate 5 (I-5) (refer to **Figure 2-1**, *Regional Location Map*, and **Figure 2-2**, *Project Location and Vicinity*). The project site is located east of the intersection of Camino De La Costa and Avenida Cortez on a coastal bluff in the Lower Hermosa Neighborhood of La Jolla. Regionally, the project site can be accessed from I-5. The project site is bounded by Camino De La Costa to the east, single-family residences to the north and south, and the Pacific Ocean to the west. Local access to the site is provided by Camino De La Costa and surrounding local streets.

2.2 Existing Site Conditions

The project site is located within the RS-1-5 zone and is designated as Low-Density Residential (5 to 9 dwelling units per acre) within the La Jolla Community Plan area (refer to **Figure 2-3**, *Existing Zoning*, and **Figure 2-4**, *Community Plan Land Use*). The project site contains sensitive coastal bluffs and is situated in the Coastal Zone between the first public roadway and the Pacific Ocean. The sensitive coastal bluffs and Special Flood Hazard Area) (note only a small portion of the coastal bluff is located within the VE Zone) qualify as Environmentally Sensitive Lands, as defined in San Diego Municipal Code (SDMC). The project site is located within overlays including Environmentally Sensitive Lands, Coastal Overlay (Appealable) Zone, Coastal Height Limit Overlay Zone, First Public Roadway Overlay Zone, Parking Impact Overlay Zone, Transit Area Overlay Zone, and Transit Priority Area.

The project site contains an existing 5,086-square-foot (SF), 2-story residence and detached garage constructed in 1924. The residence and detached garage (with maid's quarters) are a designated Historical Resource in the City of San Diego Historic Resources Register (Site No. 1481). The existing home is situated adjacent to the unprotected coastal bluff and contains a 1,587 SF basement (**Figure 2-5**, *Coastal Bluff Edge and Existing Residence*). The residence forms a "U" shape around a central courtyard, with a covered arcade, or breezeway with arches, linking the garage to the residence. The detached garage and maid's quarters are located at the southeast corner of the property at the end of the arcaded south wing walkway. The detached garage building is two stories high and features a side-gabled roof. The garage door is located on the north façade of the detached garage. Access to the second-floor living quarters above the detached garage is located on the west façade via a staircase with a wrought iron railing. The structural integrity of the existing home shows significant deterioration, including evidence of cracking of concrete walls which appears to indicate some settlement/building movement and grade beams and columns show significant damage and

deterioration, as discussed further in Section 5.2, *Geologic Conditions*, of this EIR (DCI Engineers, 2023).

The coastal bluff on the property contains residential landscaping, a concrete/masonry staircase and several stone retaining walls. The property features a stucco privacy wall across its frontage with Camino De La Costa, with the detached garage's northern wall providing a continuation of the stucco privacy wall in the northeastern portion of the property. The project site contains a driveway, inside of the stucco privacy wall, which provides access to the garage. The site contains an outdoor courtyard area and ornamental landscaping between privacy stucco wall fronting Camino De La Costa and the residential structure. Refer to the site photographs shown in **Figure 2-6a** through **Figure 2-6h**, which illustrate the current site conditions. The existing residential structure rises up approximately 33 feet above grade and no scenic corridors exist through the property westward to the Pacific Ocean, as illustrated in the site photographs, due to the location of the structure and privacy walls.

The site topography slopes downward westerly toward the coastal bluff and slopes that occur on site. Elevations across the site range from about 1 foot at the southwest corner of the property along the base of the coastal bluff to about 38 feet along the northeast perimeter of the site (San Diego Land Surveying & Engineering 2022). The central and northeastern portions of the project site are characterized by a relatively level pad that supports the existing improvements and descends gently to the southwest. The project site is underlain by fill soils, Quaternary-age old paralic deposits, and Cretaceous-age sedimentary deposits of the Point Loma Formation, with fill underlying the developed portion of the project site and the upper portions of the coastal bluff face (Christian Wheeler Engineering 2022).

The project site is located outside the Airport Influence Areas (AIA) for San Diego International Airport, Montgomery Field, and Marine Corps Air Station Miramar, as depicted in the respective airport land use compatibility plans for these airports.

2.3 Surrounding Land Uses

The project site is located within a developed, residential portion of La Jolla. The project site is bounded by Camino De La Costa on the east, the Pacific Ocean on the west, and single-family residentially developed properties to the north and south. The immediately surrounding areas consist of single-family residential development. Adjacent and surrounding land uses are designated Low-Density Residential (5 to 9 dwelling units per acre) within the La Jolla Community Plan area and are zoned RS-1-5 and RS-1-7.

2.4 Planning and Regulatory Context

The project is subject to the planning guidelines and regulatory policies of the state, regional, and local agencies. The following is a brief description of the applicable planning framework, which is taken into consideration in the environmental analysis contained in Chapters 5 and 7 of this report.

2.4.1 State Regulations

2.4.1.1 California Building Code (California Code of Regulations, Title 24)

California law provides a minimum standard for building design through the California Building Code (CBC). The CBC is a compilation of three types of building standards from three different origins:

- Building standards that have been adopted by state agencies without change from building standards contained in national model codes;
- Building standards that have been adopted and adapted from national model codes to address California's ever-changing conditions; and
- Building standards authorized by the California legislature that constitute amendments not covered by national model codes and have been created and adopted to address particular California concerns.

All occupancies in California are subject to national model codes adopted into Title 24, and occupancies are further subject to amendments adopted by state agencies and ordinances implemented by local jurisdictions' governing bodies.

2.4.1.2 Assembly Bill 52 (Native American Consultation)

Assembly Bill (AB) 52 amended CEQA to require Tribal Cultural Resources to be considered as potentially significant cultural resources. It requires that CEQA lead agencies consult with tribes that have requested consultation at initiation of the CEQA process to identify and evaluate the significance of these resources. AB 52 applies to all CEQA environmental documents for which a Notice of Preparation was filed on or after July 1, 2015.

2.4.1.3 California Coastal Act

The California Coastal Act requires projects within the Coastal Zone to be consistent with standards and policies addressing public access, recreation, marine environment, land resources, development, and industrial development. California's coastal management program is carried out through a partnership between state and local governments. Implementation of Coastal Act policies is accomplished primarily through the preparation of Local Coastal Programs (LCP) that are required to be completed. An LCP includes a land use plan which may be the relevant portion of the local general plan, including any maps necessary to administer it, and the zoning ordinances, zoning district maps, and other legal instruments necessary to implement the land use plan.

The project site is within the Coastal Zone and the City's Coastal Overlay Zone (refer to Figure 2-2). The City has the authority to issue Coastal Development Permits (CDPs) for areas of the Coastal Zone where the California Coastal Commission (CCC) has certified the LCP land use plan and related Implementation Program in the form of code regulations. These areas are known as "Coastal Commission certified areas" and include the community of La Jolla. See the discussion below under Local Regulations for a description of the La Jolla Community Plan which is the certified LCP that applies to the project site.

2.4.2 Regional Plans

2.4.2.1 Regional Air Quality Strategy

The Air Pollution Control District (APCD) and the San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the San Diego Air Basin. The San Diego County Regional Air Quality Strategy (RAQS) outlines the APCD's plans and control measures designed to attain the state air quality standards for ozone (O_3). The APCD has also developed the air basin's input to the State Implementation Plan (SIP), which is required under the federal Clean Air Act for areas that are out of attainment of air quality standards. The SIP, approved by the United States Environmental Protection Agency (USEPA) in 1996, includes the APCD's plans and control measures for attaining the O_3 national standard. Both the RAQS and SIP are generally updated on a triennial basis, with the latest update to the RAQS occurring in 2016, and to the SIP in 2020.

The RAQS relies on information from the California Air Resources Board and SANDAG, including mobile and area source emissions and information regarding projected growth in the County of San Diego, to project future emissions and then determine the strategies necessary for the reduction of emissions through regulatory controls. The SIP relies on the same information from SANDAG to develop emission inventories and emission reduction strategies that are included in the attainment demonstration for the air basin. The SIP also includes rules and regulations that have been adopted by the APCD to control emissions from stationary sources. These SIP-approved rules may be used as a guideline to determine whether a project's emissions would have the potential to conflict with the SIP and thereby hinder attainment of the national air quality standard for O_3.

2.4.2.2 Water Quality Control Plan for the San Diego Basin

In 1994, the Regional Water Quality Control Board (RWQCB) adopted the Basin Plan, which is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan (1) designates beneficial uses for surface and ground waters; (2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's anti-degradation policy; (3) describes implementation programs to protect the beneficial uses of all waters in the Region; and (4) describes surveillance and monitoring activities to evaluate the effectiveness of the Basin Plan [California Water Code Sections 13240 through 13244 and Section 13050(j)]. RWQCB periodically considers changes to the Basin Plan, at a minimum of every 3 years, and numerous amendments have been added to the Basin Plan since 1994. Additionally, the Basin Plan incorporates by reference all applicable State and Regional Board plans and policies.

2.4.3 Local Regulations

2.4.3.1 City of San Diego General Plan

The City's General Plan is a comprehensive, long-term document that sets out a long-range vision and policy framework for how the City could grow and develop, provide public services, and maintain the qualities that define San Diego. The General Plan comprises a Strategic Framework Element along with the following elements: Land Use and Community Planning; Mobility; Urban

Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; Noise; Historic Preservation; and Housing. The General Plan identifies the project site as Residential-Low (**Figure 2-7**, *General Plan Land Use*). The General Plan lays the foundation for the more-specific community plans, which rely heavily on the goals, guidelines, standards, and recommendations within the General Plan. Applicable goals and recommendations from the General Plan are referenced in this EIR, where applicable.

2.4.3.2 City of San Diego Climate Action Plan

The Climate Action Plan (CAP) serves as the City's plan for the reduction of greenhouse gas (GHG) emissions in accordance with CEQA Guidelines Section 15183.5. Adopted December 2015, the CAP includes a municipal operations and community-wide GHG emissions baseline calculation from 2010 and sets a target to achieve a 15 percent reduction from the baseline by 2020, as required by California AB 32 (City of San Diego 2015). The CAP sets forth common-sense strategies to achieve attainable GHG reduction targets and outlines the actions that City will undertake to achieve its proportional share of state GHG emission reductions.

Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP. In July 2016, the City adopted the CAP Consistency Checklist to provide a streamlined review process for the analysis of potential GHG impacts from future new development.

In August 2022, the City Council approved an update to the CAP to expand its approach and strategies for achieving the goal of net zero emissions by 2035 (City of San Diego 2022a). As such, the 2022 CAP establishes a new goal, targets and actions that go beyond the 2015 CAP goal. The five strategies include decarbonization of the built environment; access to clean and renewable energy; mobility and land use; circular economy and clean communities; resilient infrastructure and healthy ecosystems; and emerging climate actions. The 2022 CAP Update amended SDMC Land Development Code (LDC) Sections 126.0402 and 126.0404 to add Climate Action Plan Consistency Regulations (CAP Consistency Regulations) as part of the implementation measures for the CAP Update. The CAP Consistency Regulations will ultimately replace the CAP Consistency Checklist adopted in 2016 as the list of measures that can be implemented on a project-by-project basis to ensure that new development is consistent with the CAP Update. Once approved, the CAP Consistency Regulations will be applied to specified ministerial and discretionary projects to ensure that projects comply with the goals and objectives of the CAP Update.

2.4.3.3 La Jolla Community Plan and Local Coastal Program Land Use Plan

The project site is governed by the La Jolla Community Plan and Local Coastal Program Land Use Plan (La Jolla Community Plan), which was adopted by the San Diego City Council in November 2003 certified by the CCC in February 2004. Subsequent amendments to the La Jolla Community Plan were certified by the CCC in 2014. The La Jolla Community Plan is intended to supplement the City General Plan policies by identifying specific community issues and specific policies that build on those already embodied in the General Plan. It identifies a "vision" for development of La Jolla and contains policies that implement that vision. It also contains implementation strategies that

establish the time and financing required to implement the policies of that vision. The project site is identified as Low-Density Residential in the plan.

2.4.3.4 Land Development Code/Zoning

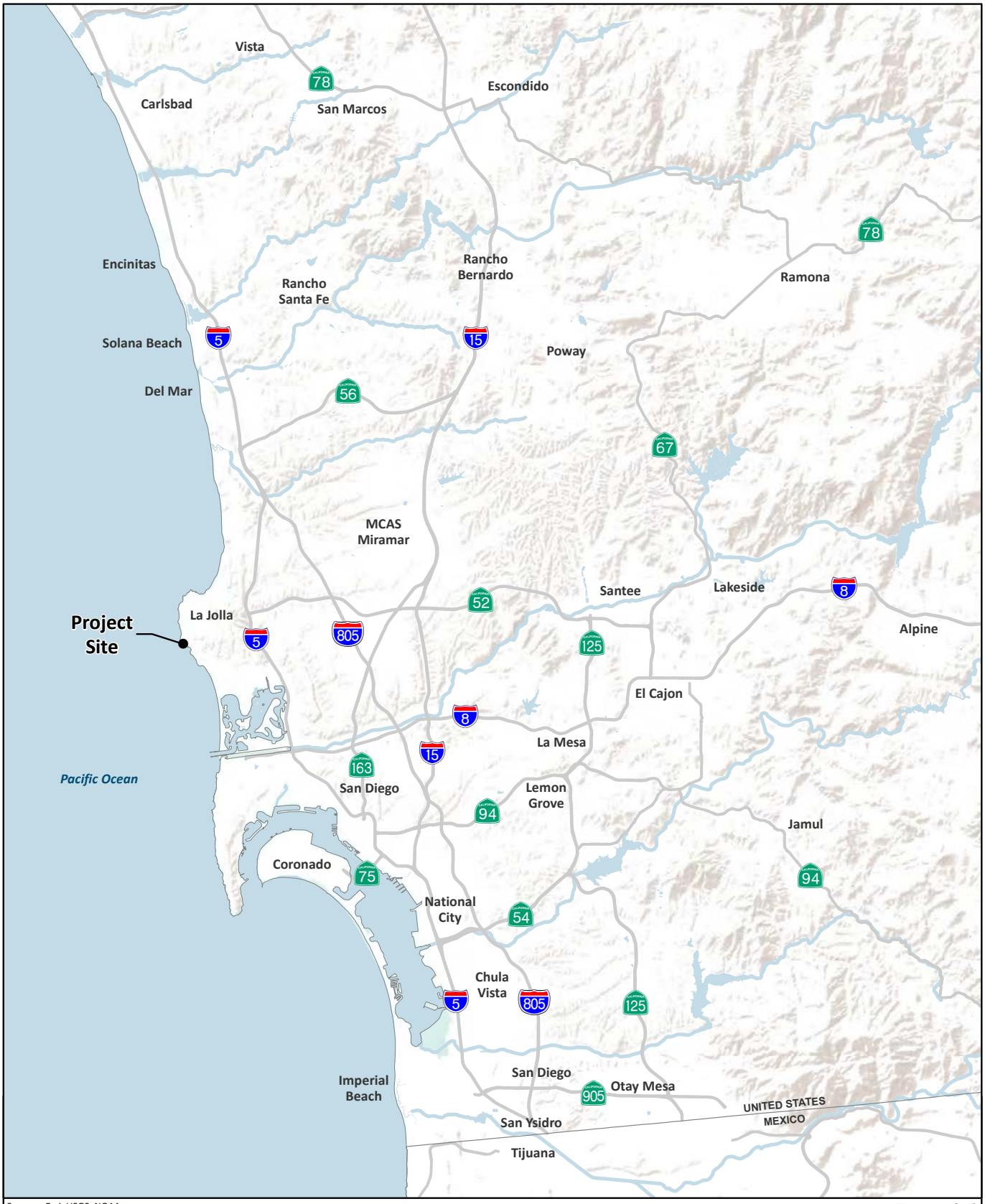
SDMC Chapters 11 through 15 are referred to as the LDC, as they contain the City's planning, zoning, subdivision, and building regulations that regulate how land is to be developed within the City. The LDC contains Citywide base zones that specify permitted land uses, residential density, FAR, and other development requirements for given zoning classifications; as well as overlay zones and supplemental regulations that provide additional development requirements.

The project site is within the RS-1-5 Zone (refer to Figure 2-3), which is intended to provide for the development of single-dwelling units that accommodate a variety of lot sizes and residential dwelling types and promote neighborhood quality, character, and livability. This zone is intended to provide for flexibility in development regulations that allow reasonable use of property while minimizing adverse impacts to adjacent properties. The RS-1-5 Zone requires a minimum of 8,000 SF lots.

LDC Chapter 14 includes the general development regulations, supplemental development regulations, building regulations, and electrical/plumbing/mechanical regulations that govern all aspects of project development. The grading, landscaping, parking, signage, fencing, and storage requirements are all contained within Chapter 14. Also included within the general regulations of Chapter 14 are the Environmentally Sensitive Land (ESL) Regulations (Section 143.0100) and Historical Resources Regulations (Section 143.0200). Other applicable regulations contained in the LDC include Coastal Overlay Zone/Coastal Overlay Zone First Public Roadway regulations (Section 132.0400), Coastal Height Limit Overlay Zone regulations (Section 132.0500), Sensitive Coastal Overlay regulations (Section 132.0600), Parking Impact Overlay Zone regulations (Section 132.0800), and Transit Area Overlay Zone regulations (Section 132.1000), as described in Section 5.1, *Land Use*, of this EIR.

2.4.3.5 Multiple Species Conservation Program/Multi-Habitat Planning Area

The Multiple Species Conservation Program (MSCP) is a County-wide environmental conservation program aimed at preserving San Diego's unique native habitats and wildlife for future generations and is implemented by the MSCP Plan. The Plan's boundaries extend over multiple jurisdictions and environments including regional watersheds and migratory wildlife corridors. The Plan also protects the region's diverse native plant and animal species, including those that are threatened and endangered. The MSCP also provides provisions and regulations which accommodate future growth and streamline building regulations while protecting natural resources in the region. City of San Diego MSCP Subarea Plan To facilitate inter-jurisdictional coordination and consistency, the MSCP is implemented through subarea plans. The City of San Diego's MSCP Subarea Plan which covered the entire City, was approved in March 1997. The MSCP Subarea Plan includes a process for the issuance of permits under the California Natural Communities Conservation Planning Act of 1991 and the federal and State Endangered Species Act. The MSCP Subarea Plan also provides guidance for simultaneous growth of local economies while protecting sensitive species and conserving regional biodiversity.



Sources: Esri, USGS, NOAA

N

0 5 Miles

Figure 2-1

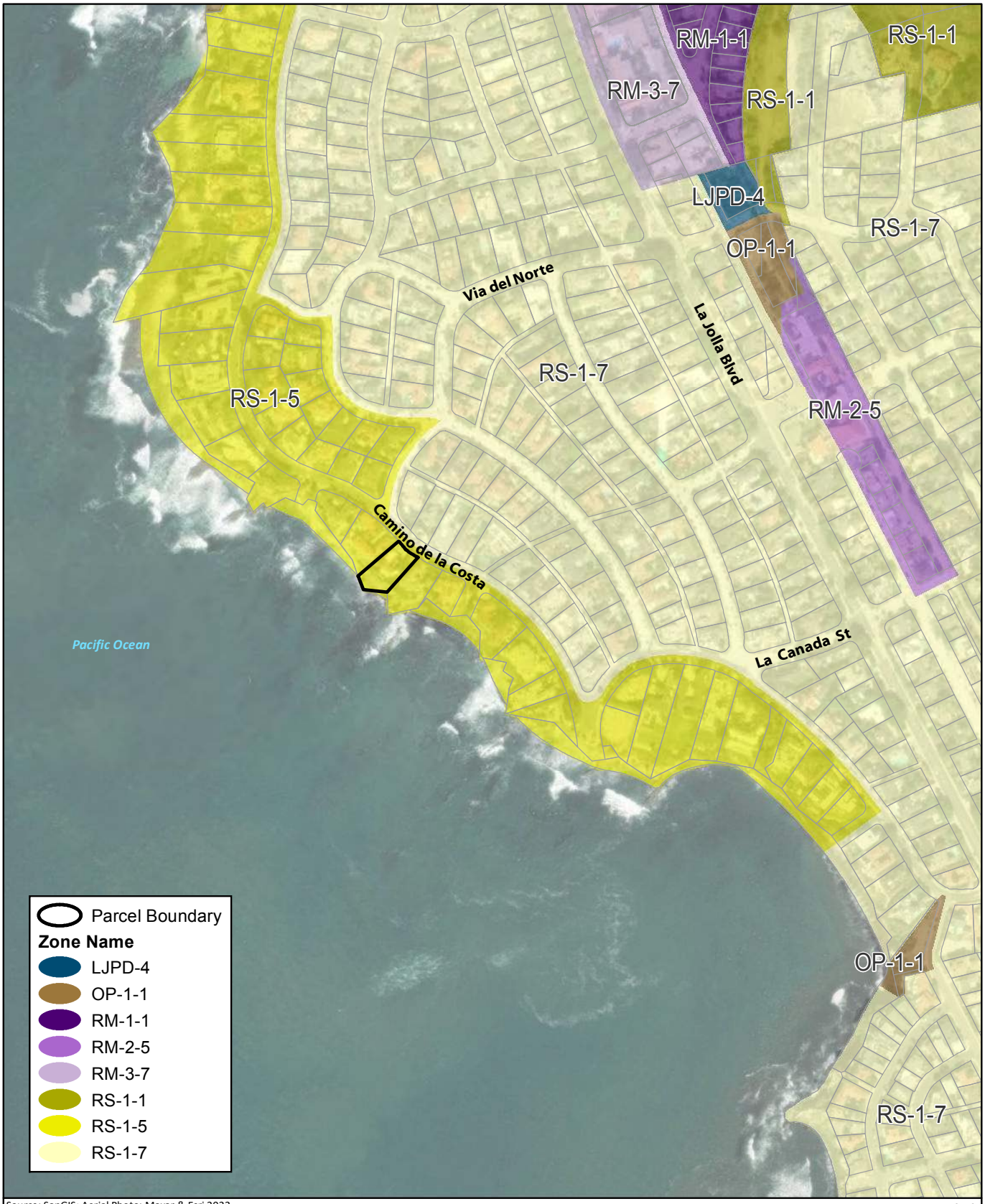
Regional Location Map

CASA DE LOS AMIGOS

Figure 2-2

Project Location and Vicinity

CASA DE LOS AMIGOS



Source: SanGIS; Aerial Photo: Maxar & Esri 2022

N

0 400 Feet

Figure 2-3

Existing Zoning

CASA DE LOS AMIGOS

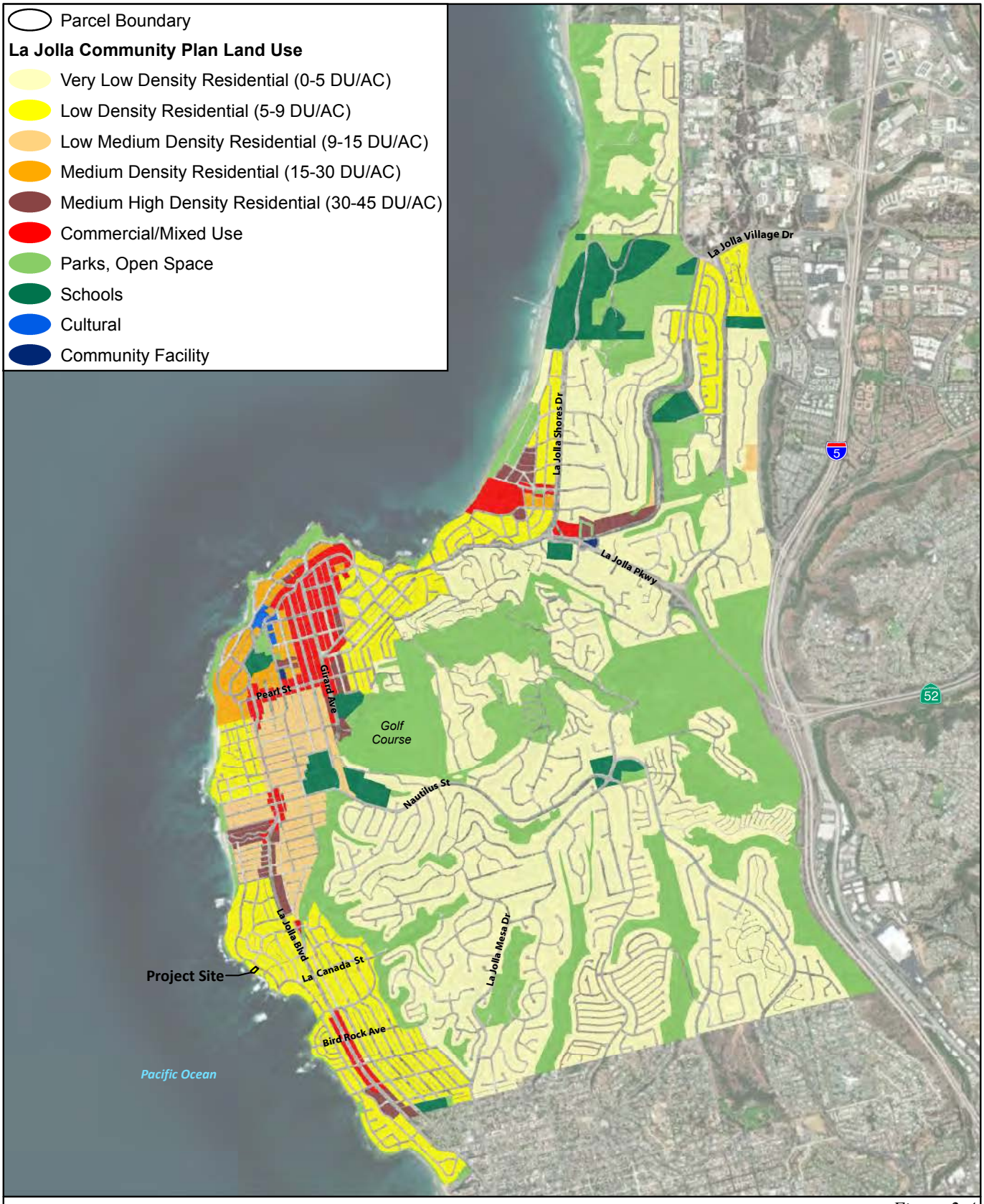
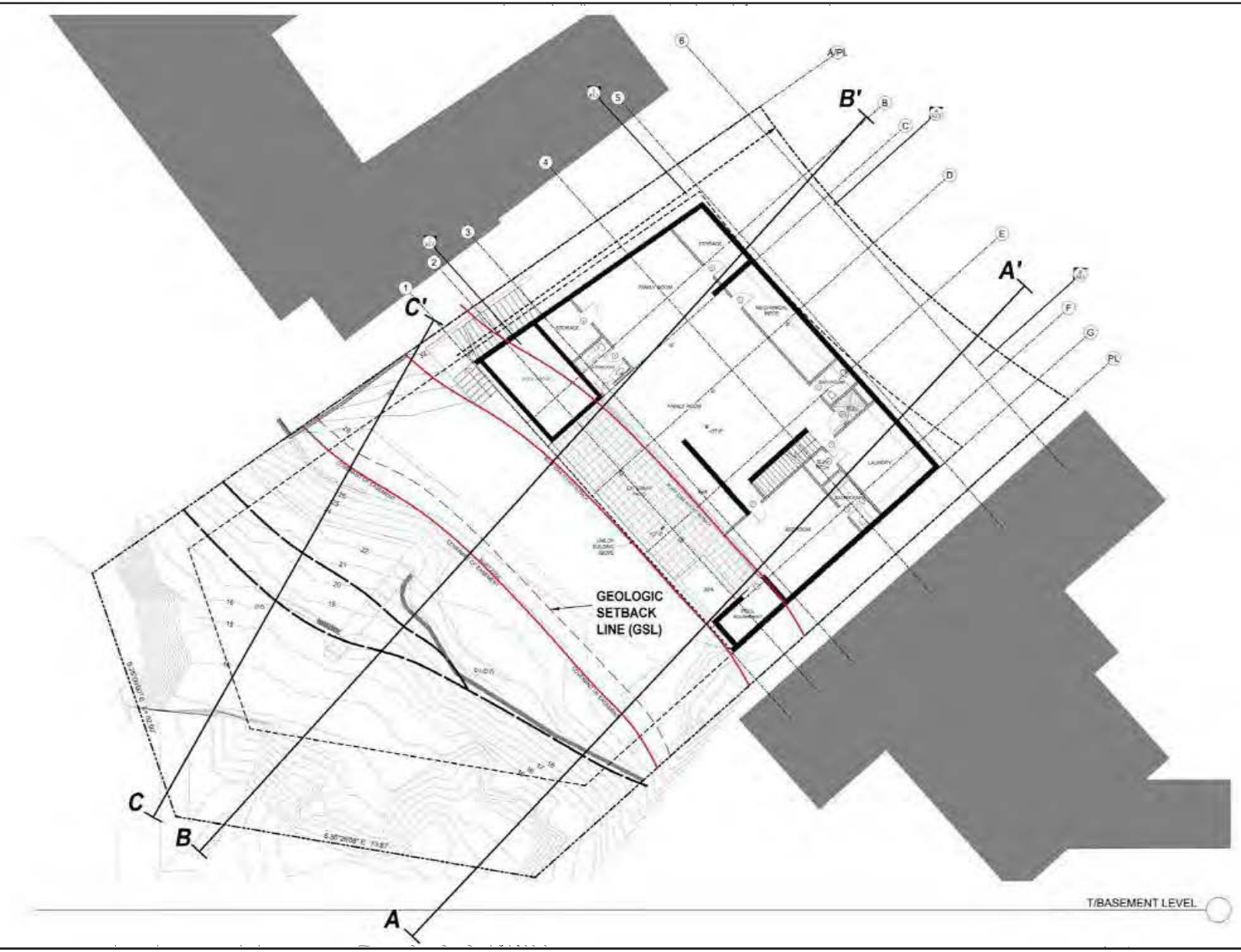


Figure 2-4

Community Plan Land Use

CASA DE LOS AMIGOS



Source:Supplemental Geotechnical Review and Analysis, Proposed New Residence, 6110 Camino de la Costa, La Jolla, GeoSoils, Inc. January 8, 2024

Figure 2-5

Geologic Setback Line and Existing Residence

CASA DE LOS AMIGOS

Source: Jonathan Segal, Architect 2023

Figure 2-6a

Site Photographs

Photo 1 – West Elevation

CASA DE LOS AMIGOS

Source: Jonathan Segal, Architect 2023

Figure 2-6b

Site Photographs

Photo 2 – West Elevation and Coastal Bluff

CASA DE LOS AMIGOS

Source: Jonathan Segal, Architect 2023

Figure 2-6c

Site Photographs

Photo 3 – East Elevation from Camino De La Costa

CASA DE LOS AMIGOS

Source: Jonathan Segal, Architect 2023

Figure 2-6d

Site Photographs

Photo 4 – Entry Gate on Camino De La Costa

CASA DE LOS AMIGOS

Source: Jonathan Segal, Architect 2023

Figure 2-6e

Site Photographs

Photo 5 – Street Elevation on Camino De La Costa

CASA DE LOS AMIGOS

Source: Jonathan Segal, Architect 2023

Figure 2-6f

Site Photographs

Photo 6 – Garage North Elevation

CASA DE LOS AMIGOS

Source: Jonathan Segal, Architect 2023

Figure 2-6g

Site Photographs

Photo 7 – Main Entry Elevation

CASA DE LOS AMIGOS

Source: Jonathan Segal, Architect 2023

Figure 2-6h

Site Photographs

Photo 8 – Northwest Elevation

CASA DE LOS AMIGOS

Source: SanGIS; Aerial Photo: Maxar & Esri 2022

N

0 400 Feet

Figure 2-7

General Plan Land Use

CASA DE LOS AMIGOS

3. PROJECT DESCRIPTION

This section of the EIR describes the goals and objectives of the project, its specific characteristics and components, project construction, and the discretionary actions required in conjunction with project approval by the City and other agencies.

3.1 Project Objectives

CEQA Guidelines require that the project description include a statement of the objectives sought by the project. A clearly defined written statement of the objectives helps the lead agency develop a reasonable range of alternatives to evaluate in the EIR and aids decision-makers in preparing findings and overriding considerations, as necessary. The statement of objectives also needs to include the underlying purpose of the project [CEQA Guidelines Section 15124(b)].

The objectives associated with the 6110 Camino de la Costa Project (project) are as follows:

- Provide a structurally secure single-family residence, which preserves, to the extend feasible, the designated historical resource or portions thereof.
- Develop a project that is consistent with the goals and policies of the *La Jolla Community Plan and Local Coastal Program Land Use Plan to the maximum extent feasible*.
- Propose a design that achieves a harmonious visual relationship between the bulk and scale of the existing and adjacent residences.

3.2 Project Design Characteristics

The project consists of the proposed demolition of an existing historically designated residence (San Diego Historic Resource Site No. 1481) and the construction of a new 2-story, 8,649-square-foot (SF) residence with a basement level which, due to the proposed slope of the site, would be at ground level on the western elevation of the structure, and underground on the eastern elevation. In addition to new construction, the project would preserve the existing historic detached garage (with modifications) and stucco privacy wall along the property frontage (with modifications) along Camino De La Costa. The following provides a more detailed description of the proposed site improvements.

3.2.1 Site Plan

The proposed site plan illustrating the layout of the project is included as **Figure 3-1**, *Site Plan*. As shown in the figure, the project would demolish the entire existing residential structure and hardscape and modify and rehabilitate a 499 SF historic wood stucco garage structure and the adjacent stucco front yard privacy wall and entries along the street frontage with Camino De La Costa. The new residential structure would be placed adjacent to and west of the rehabilitated garage structure and stucco wall features. As recommended in the geotechnical investigation assessing long-term bluff retreat over the economic lifespan of the residence (Christian Wheeler Engineering 2023; **Appendix B**, *Preliminary Geotechnical Investigation*), a design exception to the 40-foot coastal bluff setback required by the Coastal Overlay Zone is proposed to reduce the coastal bluff setback to 25 feet (refer to the discussion under Section 5.1, *Land Use*, and Appendix B for

more details). All structures and other site improvements, except landscaping, would be set back a minimum of 25 feet from the coastal bluff edge. All existing improvements, including but not limited to the existing stone walls, walkway and staircase located on the existing coastal bluff face would be removed by the project. No physical shoreline protection improvements are proposed.

The project would comply with the RS-1-5 residential zone development regulations related to side yard setbacks, building height, lot coverage, floor area ratio and parking (San Diego Municipal Code [SDMC] Section 113.0243). Several modifications are proposed as outlined in **Table 3-1**, *Proposed Modifications*, and incorporated into the site plan and architectural drawings to accommodate the existing historically-designated garage that is not in conformance with SDMC development regulations. The new residential structure would be placed on-site to allow for the creation of a 7-foot-1-inch-wide, deed-restricted view corridor with an easement to be recorded along the northern property line. Along the southern property line, where the existing historic garage is to be maintained, a deed-restricted view corridor of 1 foot 3 inches will also be established through a recorded easement. A visually permeable fence would replace short sections of the existing stucco privacy wall to facilitate views through the corridors. A covenant of easement (COE) would be recorded over the portion of the site westward of the coastal bluff to mean high tide, as shown in Figure 3-1, to protect on-site coastal resources. No improvements would be permitted within the easement, which would also be buffered from landscaping, as described below under *Landscape Concept Plan*.

Table 3-1
PROPOSED MODIFICATIONS

RS-1-5 Development Regulation	Required	Proposed
Driveway Width	12 feet	18 feet
Visibility Triangle	10 feet	Condition to install convex mirror(s) adjacent to the garage door openings and/or pedestrian-alerting devices

Source: Jonathan Segal, Architect 2023

The site would be accessible via a replaced sidewalk and relocated driveway off Camino De La Costa. The project would connect to existing stormwater, sewer, and water utilities within Camino De La Costa.

3.2.2 Architectural Design

The new residential structure is designed in a contemporary style of architecture featuring cast-in-place natural grey walls, clear glass lined by black metal framing, wood panels, decorative metal screening, a metal gated entry, and sliding gates. The exterior window system would feature low-e clear glass to minimize its reflectivity. The first and second levels of the residence would contain indoor living areas and outdoor patio areas. The residence would also have a pool and deck cantilevered above the ground floor basement level. The ground floor basement level would be constructed using a mat foundation and set back 40 feet from the coastal bluff edge. This level would feature both interior living areas and exterior use areas, including an above-ground spa. The structure's roof would feature skylights and a solar array for electrical energy production.

The residential entrance would be gated and continue to be accessible from Camino De La Costa. Exterior building elevations and building articulation are shown on **Figure 3-2**, *Exterior Elevations (West and East)*, and **Figure 3-3**, *Exterior Elevations (North and South)*. The building would be two stories of residential living area, over a ground floor basement level, resulting in a residential structure that would be approximately 30 feet in height above finished grade, consistent with the Coastal Height Limit Overlay Zone (refer to Section 5.1, *Land Use*, for additional discussion).

The new residential structure would be placed behind and west of the historic garage and privacy walls along the street as shown on Figure 3-1. The existing garage and the majority of the stucco walls would be retained and rehabilitated in accordance with the U.S. Secretary of the Interior Standards for Historic Properties (Standards), as detailed in Section 5.3, *Historical Resources*, and as outlined in the proposed Treatment Plan (**Appendix C**, *Treatment Plan*). Minor modifications are proposed to accommodate vehicle access to the garage structure and to facilitate visual access through the proposed view corridors. The four required resident and guest parking spaces would be provided within the rehabilitated garage structure via a mechanical car lift designed to provide vehicles on-demand. All of the rehabilitation work would be overseen by a construction monitor trained in the protection of historic structures, as described in Section 5.3, *Historical Resources*.

3.2.3 Landscape Concept Plan

The proposed landscape plan (refer to **Figure 3-4a**, *Ground Level Landscape Plan*, and **Figure 3-4b**, *Basement Level Landscape Plan*) contains various landscape improvements. In general, trees, succulents, and shrubs would be installed along the project frontage to enhance the streetscape, as well as along the exterior ground-floor level west of the new structure to within 5 feet of the proposed coastal bluff COE. Privacy hedges are proposed along the common property lines with adjacent residential properties. No landscaping above 3 feet in height would be installed within the view corridors along the northern and southern property lines to preserve westerly views toward the Pacific Ocean. The plant palette would feature native/naturalized and/or drought-tolerant plant material whenever possible. No invasive or potentially invasive species would be used. A net increase of 12 canopy trees would be installed on the property.

The areas outside of the landscaping would feature permeable pavers, mulch, and decomposed granite. No permanent irrigation is proposed along the coastal bluff. All hardscape would be placed to direct storm water flows toward inlet drains, which would be captured and directed to the sump basin situated in the northern portion of the backyard. Stormwater would be pumped from the sump basin to the storm drain system in the street in accordance with SDMC Section 143.143(d). More details on the proposed storm drain system are provided in Section 5.4, *Hydrology*.

3.3 Project Construction

3.3.1 Site Preparation

Site preparation would require the demolition of the existing wood and stucco residential structure, including removal of the existing 1,587 SF basement structure situated at the top of the coastal bluff. Hardscape on site, such as the existing concrete courtyard and fountain, walkways and brick-tile surfaces would also be demolished during site preparation. The project would also remove approximately 242 linear feet of existing stone walls and staircase that occur west of the bluff edge

on the property. Given the small scale of these features, the geotechnical engineer recommended that all removal and demolition activities on the coastal bluff be performed with the smallest equipment possible and that, whenever feasible, the work be conducted with hand tools. During the development of the site, the garage, privacy wall and gated site entrance would be protected in place and rehabilitated on site, as described above under *Architectural Design* and detailed in the Treatment Plan (Appendix C).

Various other site improvements would be implemented during site preparation and construction. The project would install utilities and connect to existing infrastructure in Camino De La Costa, including storm drain, water, and sewer connections. Replacement of the existing concrete sidewalk, curb and gutter and relocation of the driveway is proposed along Camino De La Costa.

3.3.2 Earthwork

All grading would be conducted under the footprint of the proposed structure (i.e., 0.17 acre). Project construction would require 150 cubic yards of native soil excavation, 1,005 cubic yards of artificial fill removal and 20 cubic yards of fill placement, resulting in a net export of 1,135 cubic yards. The artificial fill on site is at a depth of 6 to 8 feet and would be completely removed during project grading operations. All soil material excavated from the project site would be exported offsite to a proper disposal location. The maximum depth of cut would be 12 feet, while the maximum fill depth would be 3 feet. No earthwork would be conducted within the 25-foot bluff setback or along the coastal bluffs.

3.3.3 Construction

Typical construction equipment/vehicles required for project construction would include bulldozers, front-end loaders, scrapers, tractors, backhoes, paver/rollers, dump trucks, water trucks, and concrete mixers. Construction staging would occur within the approved project disturbance footprint and would be located as far away as possible from existing residences and the coastal bluff.

The project would be constructed in a single phase, and construction is estimated to begin in late 2024 and be completed within 18 months to two years (i.e., late 2026). Demolition and construction would occur over an approximately six-month period, followed by structural and site improvements with landscape installation comprising the final step. It is anticipated that the construction activities would occur from 7 a.m. to 7 p.m. Monday through Saturday, excluding public holidays, in accordance with SDMC Section 59.5.0404.

3.4 Discretionary Actions

The following Process 4 approvals from the City Planning Commission are being sought by the applicant for the project:

3.4.1 Coastal Development Permit

A Coastal Development Permit (CDP) is required for the project to allow for the demolition of the existing single-family residential structure and related site features and the construction of a new single-family residential structure within the Coastal Overlay Zone (COZ).

3.4.2 Site Development Permit

A Site Development Permit (SDP) is required for the project to demolish the designated historic structure at 6110 Camino De La Costa, San Diego Historic Resource No. 1481, per SDMC Section 126.0502(d)(1). The City's Historical Resources Regulations require that all designated historical resources be maintained consistent with the Standards. The proposed project is a substantial alteration that is not consistent with the Standards; therefore, a deviation from the Historical Resources Regulations is being requested. The SDP is also required due to the presence of Environmentally Sensitive Lands (ESL), consisting of coastal bluffs and special flood hazard area, on the project site. As part of the SDP process, a COE would be recorded on the portion of the project site that is west of the bluff edge to the mean high tide line for the protection of on-site coastal bluff and flood hazard areas. Recordation of the COE would prohibit the applicant from installing improvements, including shoreline protection devices, along the coastal bluff in the future.

3.4.3 Neighborhood Development Permit

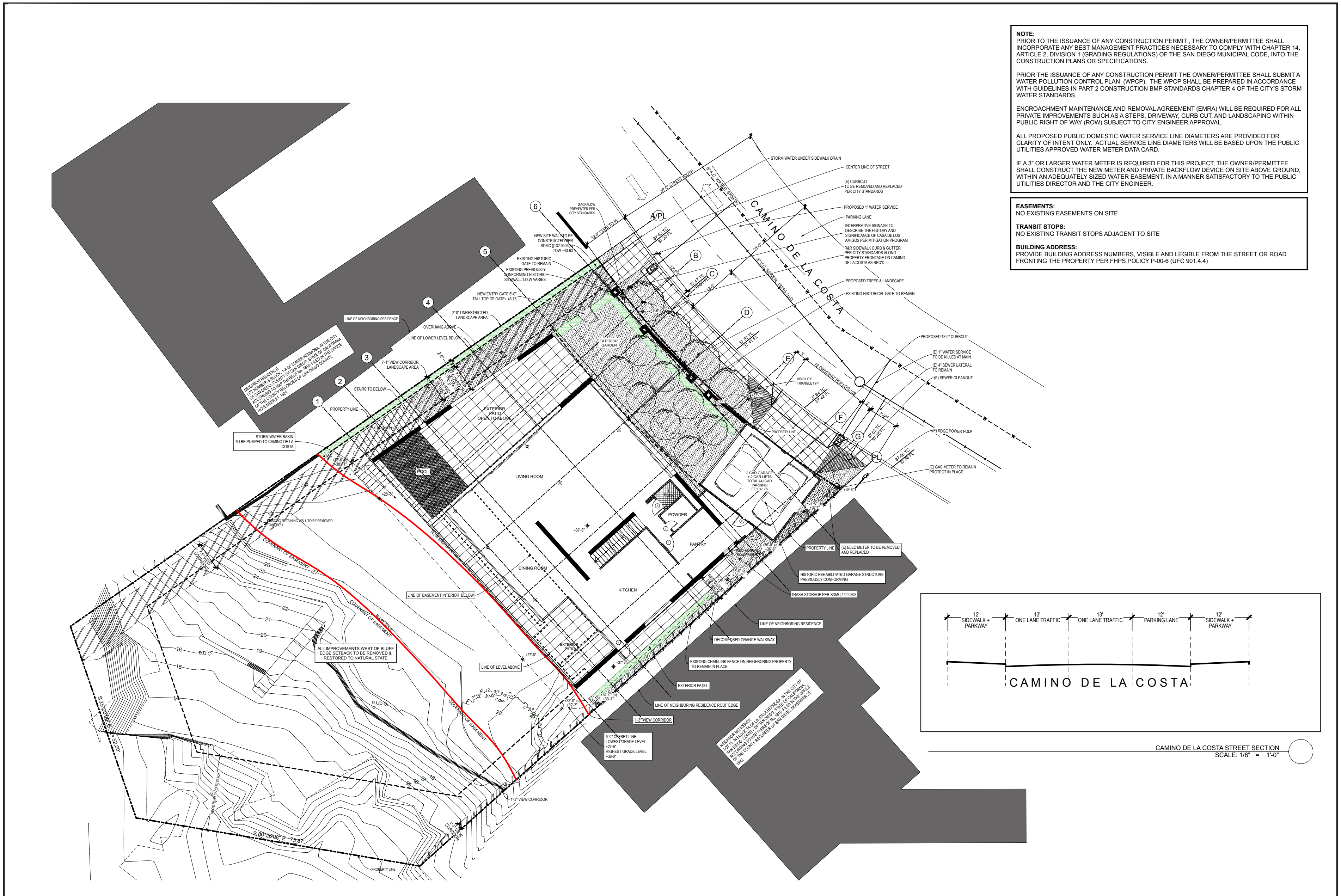
A Neighborhood Development Permit (NDP) is required when a project proposes the maintenance, repair, alteration, or replacement of a previously conforming structure where the proposed development also requires a Coastal Development Permit as described in SDMC Section 127.0104. In the case of the project, the NDP is required for the modifications to the historic garage and privacy wall, which are previously conforming structures, given they do not conform to SDMC requirements and given the project requires a CDP, as described above under Section 3.4.1.

3.4.4 Other Agency Approvals

No other agency approvals are required to implement the project.

3.5 Intended Uses of the EIR

Pursuant to CEQA Guidelines Section 15124(d), the description of a project shall contain a statement briefly describing the intended uses of the EIR. The City would use the information in this EIR and supporting documentation in its decision to approve the required discretionary permits.

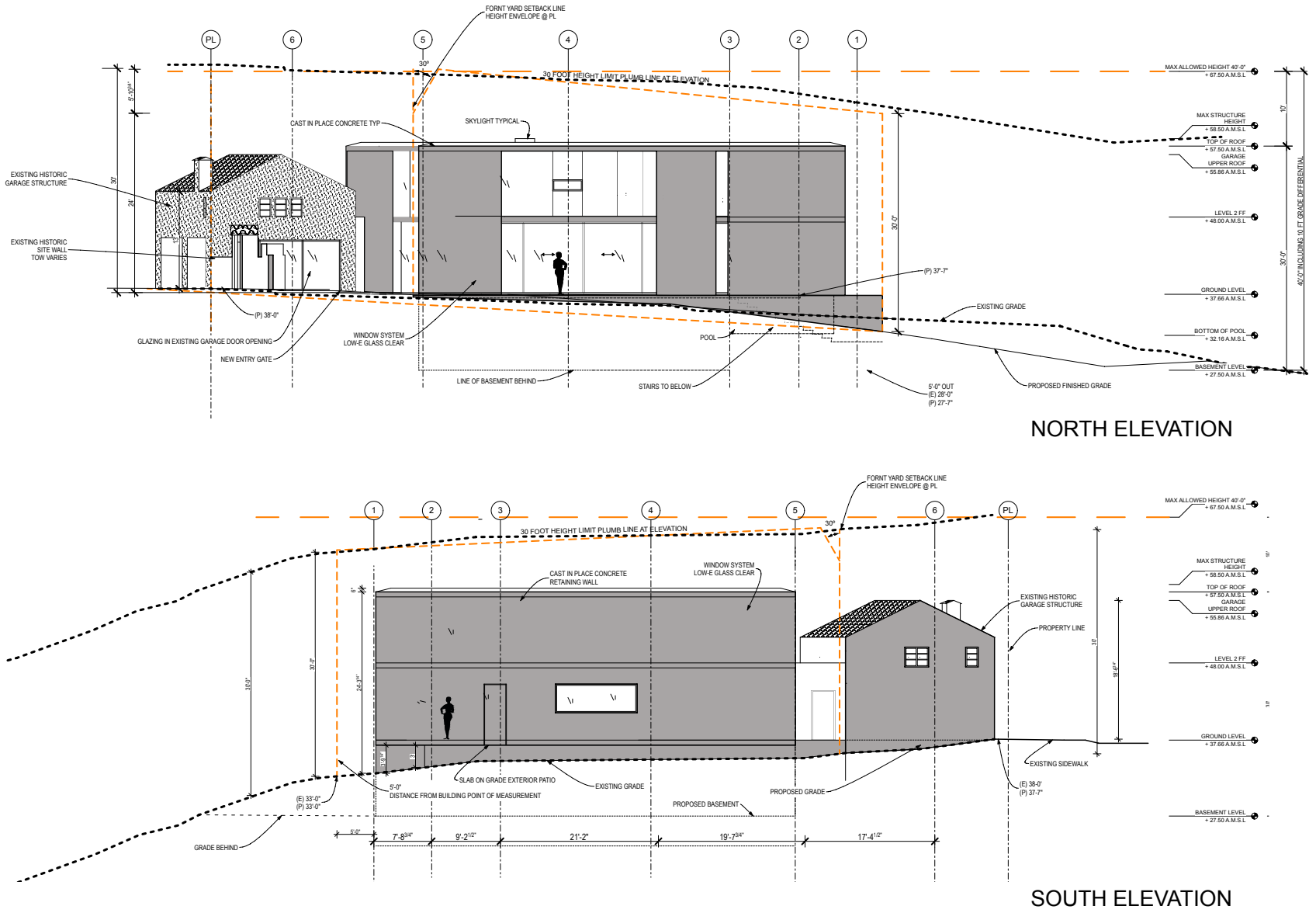


Source: Jonathan Segal, Architect 2023

Figure 3-1

Site Plan

CASA DE LOS AMIGOS

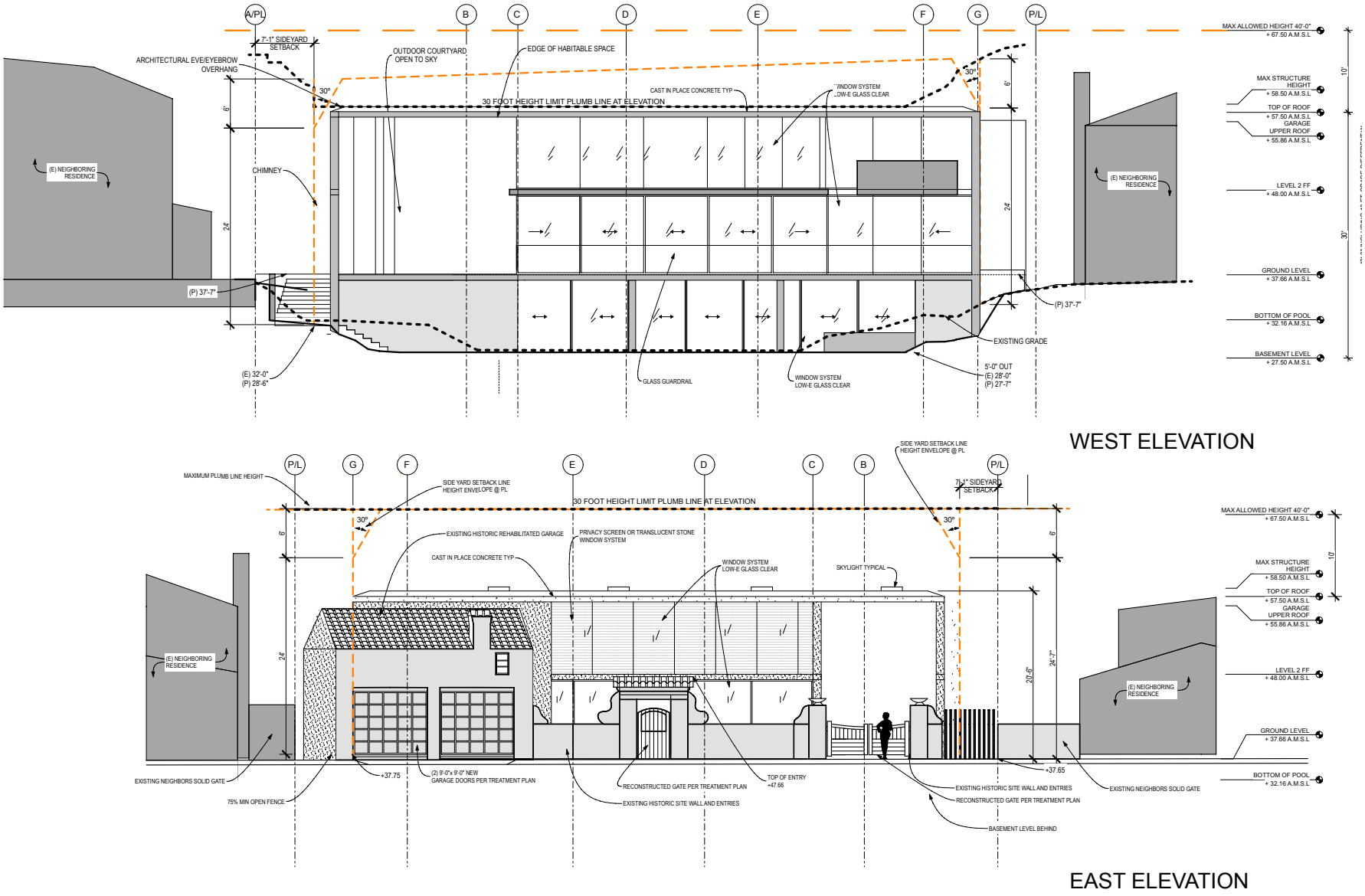


Source: Jonathan Segal, Architect 2023

Figure 3-3

Exterior Elevations (North and South)

CASA DE LOS AMIGOS

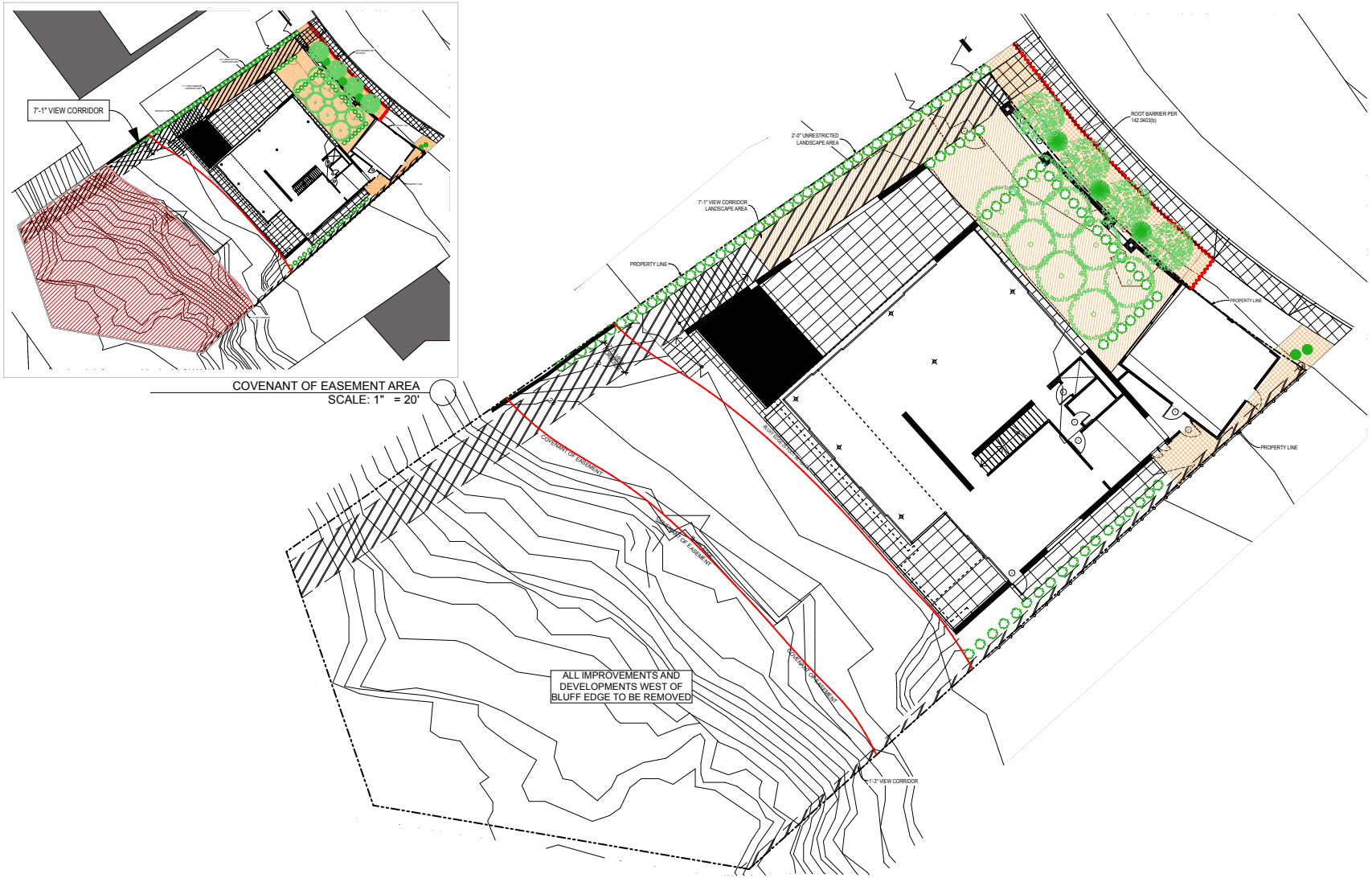


Source: Jonathan Segal, Architect 2023

Figure 3-2

Exterior Elevations (West and East)

CASA DE LOS AMIGOS



Source: Jonathan Segal, Architect 2023

Figure 3-4a

Ground Level Landscape Plan

CASA DE LOS AMIGOS

LANDSCAPE

	OPTION	SCIENTIFIC NAME	COMMON NAME	QTY	CONTAINER SIZE	MATURE SIZE
	1	PEROVSKIA ATRIPLICIFOLIA	RUSSIAN SAGE	30	5 GALLON	3'H x 3'W
	1	PYRUS KAWAKAMII	EVERGREEN PEAR	8	24" BOX	20'H x 15'W
	1	JACARANDA MIMOSIFOLIA	JACARANDA	4	24" BOX	30'H x 15'W
	1	FICUS BENJAMINA	FICUS	100	5 GALLON	6-10' H
	1	ALOE SATIA	CORAL ALOE	12	5 GALLON	12-18"H
	2	ERIOGONUM FASCICULATUM	CALIFORNIA BUCKWHEAT	12	5 GALLON	12-18"H
	1	ALOE SATIA	CORAL ALOE	12	5 GALLON	12-18"H
	2	SEDUM RUPESTRE 'ANGELINA'	ANGELINA STONECROP	12	5 GALLON	12-18"H

DECOMPOSED GRANITE | MULCH | PERMEABLE PAVERS

NOTES:

All landscape and irrigation shall conform to the standards of the City-Wide Landscape Regulations and the City of San Diego Land Development Manual Landscape Standards and all other landscape related City and Regional Standards.

Maintenance: All required landscape areas shall be maintained by Owner. Landscape and irrigation areas in the public right-of-way shall be maintained by Owner. The landscape areas shall be maintained free of debris and litter, and all plant material shall be maintained in a healthy growing condition. Diseased or dead plant material shall be satisfactorily treated or replaced within 30 days of a final landscape inspection."

Trees shall be maintained so that all branches over pedestrian walkways are 6 feet above the walkway grade and branches over vehicular travel ways are 16 feet above the grade of the travel way per SDMC 142.0403(b)(11)

A minimum root zone of 40sf in area shall be provided for all trees. The minimum dimension for this area shall be 5 feet, per SDMC 142.0403(b)(5)

Tree root barriers shall be installed where trees are placed within 5 feet of public improvements including walks, curbs, or street pavements or where new public improvements are placed adjacent to existing trees. The root barrier will not wrap the root ball".

All pruning shall comply with the standards of the American National Standards Institute (ANSI) for tree care operations and the International Society of Arboriculture (ISA) for tree pruning. Topping of trees is not permitted.

Mulch: All required planting areas and all exposed soil areas without vegetation shall be covered with mulch to a minimum depth of 3 inches, excluding slopes requiring revegetation per SDMC 142.0411.

MINIMUM TREE SEPARATION DISTANCE
Traffic signals / stop signs - 20 feet
Underground utility lines - 5 feet (10' for sewer)
Above ground utility structures - 10 feet
Driveway (entries) - 10 feet (5' for residential streets < 25mph) Intersections (intersecting curb lines of two streets) - 25 feet

Maximum Applied Water Allowance (MAWA)

ETWU = ((ETo)(0.62)((PF)(HA) + (SLA)(1 - gallons per year

ETo	40	Evapotranspiration (inches per year)
CONV FACTOR	0.62	
PF	0.1	plant factor
HA	2609	total hydrozone area sq ft
IE	0.81	Irrigation Efficiency (.81 for Drip Systems)
SLA	0	Special Landscape Area
	14,874	Total Gallons Allowed

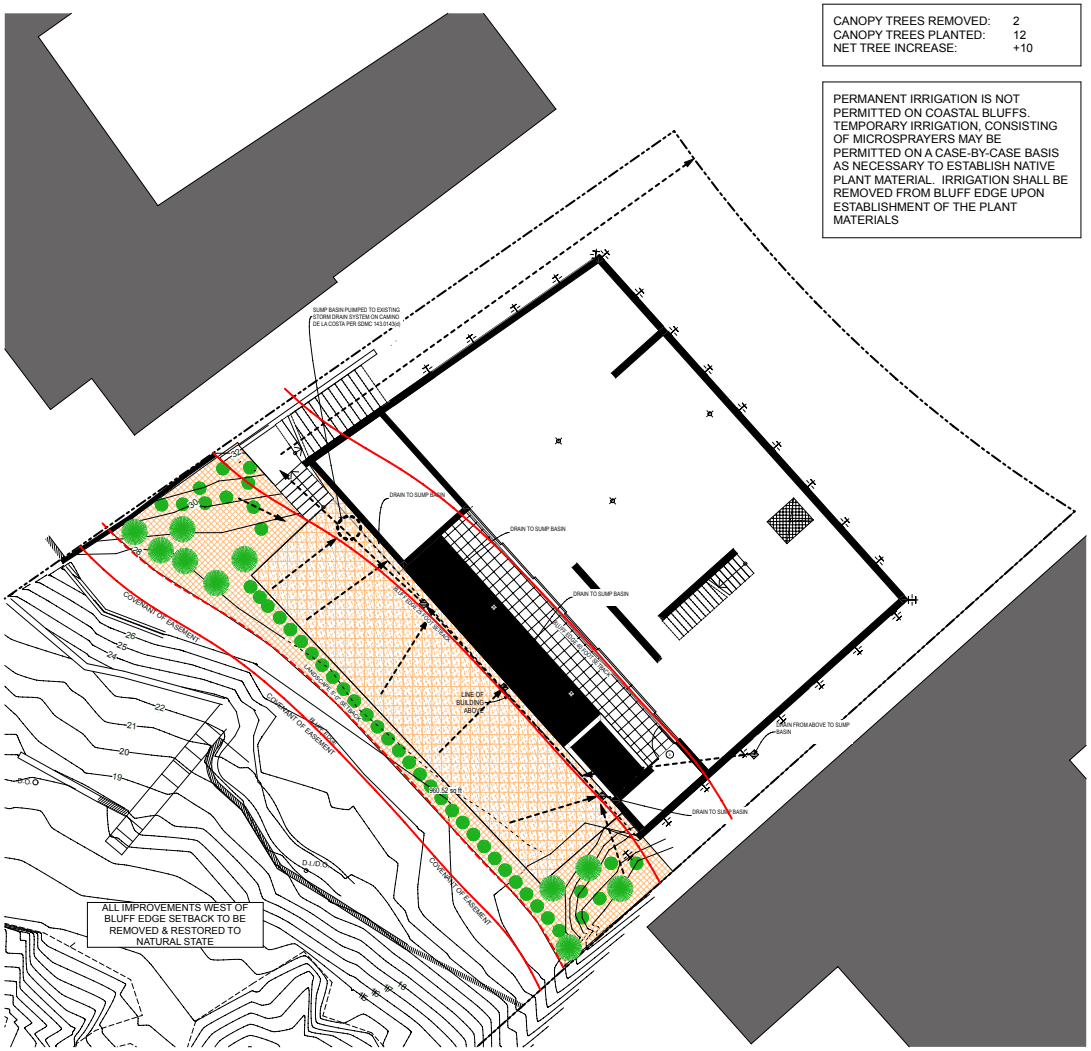
Controller No.	Hydrozone No.	Valve Circuit	Plant Factor	Hydrozone Area in SF	Irrigation Method	Irrigation Efficiency	% Total Landscape	Allowed Gallons
1	1	1	0.2	995	Microsprayers	0.75	38.14%	8773.7
2	2	2	0.1	1003	Drip	0.81	38.44%	3791.3
3	3	3	0.1	199	Drip	0.81	7.59%	748.4
4	4	4	0.1	413	Drip	0.81	15.83%	1561.1

Estimated Total Water Use (ETWU)

Hydrozone	ETo (Annual Inches)	Factor (Conversion)	Plant Factor (PF)	Hydrozone Area (HA)	Irrigation Efficiency (IE)	Special Lanscape Area (SLA)	Gallons (ETWU)
1-Microsprayer	40	0.62	0.2	995	0.75	0	6583
2-Drip	40	0.62	0.1	1003	0.81	0	3771
3-Drip	40	0.62	0.1	199	0.81	0	606
4-Drip	40	0.62	0.1	413	0.81	0	1264
			Total Areas	2,609			
						ETWU Total =	11,522

MWELO Requirement

ETWU Total	<	MAWA
11,522	<	14,874



CANOPY TREES REMOVED: 2
CANOPY TREES PLANTED: 12
NET TREE INCREASE: +10

PERMANENT IRRIGATION IS NOT PERMITTED ON COASTAL BLUFFS. TEMPORARY IRRIGATION, CONSISTING OF MICROSPRAYERS MAY BE PERMITTED ON A CASE-BY-CASE BASIS AS NECESSARY TO ESTABLISH NATIVE PLANT MATERIAL. IRRIGATION SHALL BE REMOVED FROM BLUFF EDGE UPON ESTABLISHMENT OF THE PLANT MATERIALS

Source: Jonathan Segal, Architect 2023

Figure 3-4b

Basement Level Landscape Plan

CASA DE LOS AMIGOS

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4. HISTORY OF PROJECT CHANGES

This section chronicles changes that have been made to the project design in response to environmental concerns raised during the application review. The project design has been revised several times to address comments raised by the City of San Diego Development Services Department, the Design Assist Subcommittee of the Historical Resources Board, and California Coastal Commission staff. Specifically, the following changes have been integrated into the project design described in Chapter 3, *Project Description*:

- The original site plan was revised from a complete demolition of the existing residence, including the historic garage, privacy wall and site improvements, to retain and rehabilitate the historic garage and privacy wall along the frontage of Camino De La Costa in response to the site's historical resources designation as a locally important resource.
- The living space in the upper level of the rehabilitated garage was abandoned to accommodate the proposed parking lift system to enable on-demand parking and comply with the San Diego Municipal Code (SDMC) parking requirements of four on-site spaces.
- The original design for the proposed ground-floor basement level has been reconfigured and reduced in size from 5,500 square feet (SF) to an interim design of 3,884 SF, and to the proposed design of 3,138 SF in order to increase the basement's setback from the coastal bluff from 25 feet to 40 feet as recommended in the ESL regulations and by the California Coastal Commission staff comments.
- The pool was originally proposed in the center of the western edge of the ground-floor basement level and subsequently relocated northward and elevated to the first-floor level of the residence outside the 40-foot setback from the coastal bluff, whereby reducing the amount of grading.
- The green roof was eliminated from the original project design and rooftop solar panels were added to comply with the Climate Action Plan (CAP) and the California Energy Code.
- Small sections of the historic stucco privacy wall were removed to install visually permeable fencing along the public streetscape to create dedicated view corridors along the northern and southern property lines.
- The removal of the existing driveway allowed for the addition of canopy trees to the landscape plan, furthering the city's CAP goals by enhancing the streetscape along Camino De La Costa.
- In response to the above-described project design changes, project site grading has been reduced, and all of the artificial fill on the site will be removed.

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5. ENVIRONMENTAL ANALYSIS

5.1 Land Use

This section discusses applicable land uses, plans and policies and the project's compliance with those plans and policies. The discussion relies on planning and environmental information contained in other sections of this EIR, as applicable.

5.1.1 Existing Conditions

5.1.1.1 On-Site Land Uses

The 0.37-acre project site consists of one lot at 6110 Camino De La Costa (Assessor's Parcel Number [APN] 357-141-05-00). The project site is developed with an existing 5,086-square-foot (SF), two-story residential structure and detached garage constructed in 1924. The existing home is situated along an unprotected coastal bluff and contains a 1,587 SF basement that leads to coastal bluff improvements (Figure 2-5, *Coastal Bluff Edge and Existing Residence*). Beyond the home, the coastal bluff features residential landscaping, a concrete/masonry staircase and several stone retaining walls. The residential structure is a designated Historical Resource in the City of San Diego Historic Resources Register (Site No. 1481). Refer to Figures 2-6a through 2-6h in Chapter 2, *Environmental Setting*, which contain photographs of the existing residential uses and general setting on and adjacent to the project site.

The project site contains sensitive coastal bluffs and is situated in the Coastal Zone between the first public roadway and the Pacific Ocean. The sensitive coastal bluffs qualify as Environmentally Sensitive Lands (ESL), as defined in San Diego Municipal Code (SDMC) Section 113.0103 and discussed below under *Local Regulations*. The site topography slopes downward westerly toward the coastal bluff. Elevations across the site range from about 1 foot above sea level (ASL) at the southwest corner of the property along the base of the coastal bluff to about 38 feet ASL along the northeast perimeter of the site (San Diego Land Surveying & Engineering 2022).

The project site is located within the Coastal Overlay Zone (Appealable), Coastal Overlay Zone First Public Roadway, Coastal Height Limit Overlay Zone, Parking Impact Overlay Zone, Sensitive Coastal Overlay Zone, and Transit Area Overlay Zone. The project site is also located within a 2035 Transit Priority Area (TPA) mapped by SANDAG and adapted by the City, in accordance with Senate Bill (SB) 743 (City of San Diego 2019b). The project site is zoned Residential (RS-1-5) and designated low-density residential by the La Jolla Community Plan (refer to Figure 2-3, *Existing Zoning*). The site is located outside the Airport Influence Area (AIA) for San Diego International Airport, Montgomery Field and MCAS Miramar, is ~~not~~ located within a 100-year floodplain and is not located within or adjacent to the City's Multi-Habitat Planning Area (MHPA).

The purpose of the RS zones is to provide appropriate regulations for the development of single dwelling units that accommodate a variety of lot sizes and residential dwelling types and that promote neighborhood quality, character, and livability. It is intended that these zones provide flexibility in development regulations that allow reasonable use of property while minimizing

adverse impacts to adjacent properties. The RS-1-5 Zone requires a minimum 8,000 SF residential lots.

5.1.1.2 Surrounding Land Uses

The project site is bounded by Camino De La Costa on the east, the Pacific Ocean on the west, and single-family residentially developed properties to the north and south. The neighborhood is referred to as the Lower Hermosa area of La Jolla and is comprised of low-density residential development. A public vista point overlooking the coastal bluffs and Pacific Ocean (i.e., public vantage viewpoint 78, *Camino De La Costas includes Cortez Place, Costa Place*, in Figure 9 of the Community Plan) is situated at a curve along Camino De La Costa approximately 0.15 miles south of the project site.

5.1.2 Regulatory Framework

In addition to state regulations, plans, policies, and ordinances that pertain to land use and coastal resources, there are goals, policies and regulations of the City of San Diego General Plan, La Jolla Community Plan/Local Coastal Plan, City of San Diego Land Development Code (LDC), MSCP Subarea Plan, and California Coastal Act which are applicable to the project, as described below.

5.1.2.1 State Regulations

California Building Code [California Code Regulations, Title 24]

California law provides a minimum standard for building design through the California Building Code (CBC). The CBC is a compilation of three types of building standards from three different origins:

- Building standards that have been adopted by state agencies without change from building standards contained in national model codes;
- Building standards that have been adopted and adapted from national model codes to address California's ever-changing conditions; and
- Building standards, authorized by the California legislature, that constitute amendments not covered by national model codes, that have been created and adopted to address particular California concerns.

All occupancies in California are subject to national model codes adopted into Title 24, and occupancies are further subject to amendments adopted by state agencies and ordinances implemented by local jurisdictions' governing bodies.

California Coastal Act

The California Coastal Act requires projects within the Coastal Zone to be consistent with standards and policies addressing public access, recreation, marine environment, land resources, development, and industrial development. California's coastal management program is carried out through a partnership between state and local governments. Implementation of Coastal Act policies is accomplished primarily through the preparation of Local Coastal Programs (LCP) that are required to be completed. An LCP includes a land use plan which may be the relevant portion of the local

general plan, including any maps necessary to administer it, and the zoning ordinances, zoning district maps, and other legal instruments necessary to implement the land use plan.

The project site is within the Coastal Zone and the City's Coastal Overlay Zone. The City has the authority to issue Coastal Development Permits (CDP) for areas of the Coastal Zone where the California Coastal Commission (CCC) has certified the LCP land use plan and related Implementation Program in the form of code regulations. These areas are known as "Coastal Commission-certified areas" and include the community of La Jolla. See the discussion below under *Local Regulations* for a description of the La Jolla Community Plan, which is the certified LCP that applies to the project site. In the case of the project, its CDP is appealable to the CCC.

5.1.2.2 Local Regulations

City of San Diego General Plan

The City approved its *General Plan* on March 10, 2008. The General Plan is a comprehensive, long-term document that sets out a long-range vision and policy framework for how the City could grow and develop, provide public services, and maintain the qualities that define San Diego. Accordingly, the General Plan "provides policy guidance to balance the needs of a growing city while enhancing quality of life for current and future San Diegans" (City of San Diego 2008a). The General Plan is comprised of a Strategic Framework section and ten elements including: Land Use and Community Planning; Mobility; Urban Design; Public Facilities, Services, and Safety; Conservation; Historic Preservation; Noise; and Housing, which was most recently updated in 2013. The following discussion summarizes each element that is relevant to the project. In addition, applicable goals and policies from various elements are listed and the project's consistency is evaluated in detail in Table 5.1-2, *City of San Diego General Plan Land Use Goals, Objectives, and Policies Consistency Evaluation*, at the end of this section.

Land Use and Community Planning Element

The purpose of the Land Use and Community Planning Element (Land Use Element) is "to guide future growth and development into a sustainable citywide development pattern, while maintaining or enhancing quality of life in our communities" (City of San Diego 2008a). The Land Use Element addresses land use issues that apply to the City as a whole and identifies the community planning program as the mechanism to designate land uses, identify site-specific recommendations, and refine citywide policies, as needed. The Land Use Element establishes a structure that respects the diversity of each community and includes policies that govern the preparation of community plans. The Land Use Element addresses zoning and policy consistency, the plan amendment process, airport-land use planning, annexation policies, balanced communities, equitable development, and environmental justice. The project site is designated as "Residential-Low" on Figure LU-2, *General Plan Land Use and Street System*, in the General Plan (refer to Figure 27-, *General Plan Land Use*, of this EIR). The Residential-Low category provides for both single-family and multifamily housing within a low-density range (i.e., 5 to 9 du/ac).

Mobility Element

The purpose of the Mobility Element is "to improve mobility through development of a balanced, multi-modal transportation network" (City of San Diego 2008a). The element identifies the proposed transportation network and strategies needed to support the anticipated General Plan land uses.

The Mobility Element's policies promote a balanced, multimodal transportation network to make walking, bicycling, and transit use more safe, attractive, and efficient forms of transportation, while addressing the needs of drivers. The Mobility Element contains policies that address multimodal transportation, parking, the movement of goods and services, and other components of a transportation system while balancing the goals of protecting neighborhood characters and environmental resources. Together, these policies advance a strategy for relieving congestion and increasing transportation choices.

Urban Design Element

The purpose of the Urban Design Element is "to guide physical development toward a desired image that is consistent with the social, economic and aesthetic values of the City" (City of San Diego 2008a). The Urban Design Element policies capitalize on San Diego's natural beauty and unique neighborhoods by calling for development that respects the natural setting, enhances the distinctiveness of its neighborhoods, strengthens the natural and built linkages, and creates mixed-use, walkable villages throughout the city. Urban Design Element policies help support and implement land use and transportation decisions, encourage economic revitalization, and improve the quality of life in San Diego. Ultimately, the Urban Design Element influences the implementation of all of the General Plan's elements and community plans. It sets goals and policies for the pattern and scale of development as well as the character of the built environment.

Public Facilities, Services, and Safety Element

The purpose of the Public Facilities, Services, and Safety Element (Public Facilities Element) is "to provide the public facilities and services needed to serve the people that live in and visit San Diego" (City of San Diego 2022c). This element contains policies that address public financing strategies, public and developer financing responsibilities, prioritization, and the provision of specific facilities and services that must accompany growth. The policies within the Public Facilities Element also apply to transportation, as well as park and recreation facilities and services. The element also provides policies to guide the provision of a wide range of public facilities and services, including fire-rescue, police, wastewater, stormwater infrastructure, water infrastructure, waste management, libraries, schools, information infrastructure, public utilities, regional facilities, healthcare services and facilities, disaster preparedness, and seismic safety.

Conservation Element

The purpose of the Conservation Element is "to become an international model of sustainable development and conservation and to provide for the long-term conservation and sustainable management of the rich and natural resources that help define the City's identity, contribute to its economy, and improve its quality of life" (City of San Diego 2008a). The Conservation Element contains policies to guide the conservation of resources that are fundamental components of San Diego's environment, that help define the City's identity, and that are relied upon for continued economic prosperity. San Diego's resources include but are not limited to water, land, air, biodiversity, minerals, natural materials, recyclables, topography, viewsheds, and energy. The Conservation Element contains policies for sustainable development; preservation of open space and wildlife; management of resources; and other initiatives to protect the public health, safety, and welfare.

Noise Element

The purpose of the Noise Element is "to protect people living and working in the City from excessive noise" (City of San Diego 2008a). The Noise Element provides goals and policies to guide compatible land uses and the incorporation of noise attenuation measures for new uses to protect people living and working in the City from an excessive noise environment.

Historic Preservation Element

The purpose of this element is to guide the preservation, protection, restoration, and rehabilitation of historical and cultural resources and maintain a sense of the city; to improve the quality of the built environment, to encourage appreciation for the city's history and culture, to maintain the character and identity of communities, and to contribute to the City's economic vitality through historic preservation.

Housing Element

The purpose of the Housing Element of the General Plan is "to create a comprehensive plan with specific measurable goals, policies and programs to address the City's critical housing needs and foster the development of sustainable communities in support of the State's Greenhouse Gas (GHG) Emission reduction targets, consistent with the region's sustainable communities strategy" (City of San Diego 2013). The Housing Element serves as a policy guide to address the comprehensive housing needs of the city. It is intended to be an integrated, internally consistent, and compatible statement of policies for housing in the city. In accordance with California SB 375, which seeks to reduce GHG emissions, the Housing Element is a key part of an integrated transportation and housing planning process coordinated through a Sustainable Communities Strategy (SCS) and regional transportation plan.

Climate Action Plan

The City adopted its Climate Action Plan (CAP) in December 2015. The CAP serves as the City's plan for the reduction of GHG emissions in accordance with CEQA Guidelines Section 15183.5. The General Plan calls for the City to reduce its carbon footprint through actions including adopting new or amended regulations, programs, and incentives. General Plan Policy CE-A.13 specifically identifies the need for an update of the City's 2005 Climate Protection Action Plan that identifies actions and programs to reduce the GHG emissions of the community-at-large, and City operations. The CAP serves as a "Qualified GHG Reduction Plan" for purposes of tiering under CEQA. The CAP quantifies baseline GHG emissions for 2010, provides emissions forecasts for 2020 and 2035, establishes reduction targets for 2020 and 2035, identifies strategies and measures to reduce GHG levels, and provides guidance for monitoring progress on an annual basis. Implementation of the CAP relies on compliance with various policies within the General Plan.

The City initially adopted its CAP Consistency Checklist in July 2016 and updated the checklist in July 2017. The CAP Consistency Checklist is an implementation tool for the CAP and contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. Implementation of the measures would ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets.

In 2022, the City updated its CAP to capture new strategies for reducing GHG emissions within its jurisdiction. The 2022 CAP establishes a community-wide goal of net zero by 2035, committing San Diego to an accelerated trajectory for GHG reductions. A draft Implementation Plan was produced which outlines the details for achieving each CAP action. Once adopted, it will become the blueprint for achieving the goals established in the 2022 CAP.

La Jolla Community Plan and Local Coastal Program Land Use Program

The project site is governed by the *La Jolla Community Plan and Local Coastal Program Land Use Program* (La Jolla Community Plan), which was adopted by the San Diego City Council in November 2003 certified by the CCC in February 2004. Subsequent amendments to the La Jolla Community Plan were certified by the CCC in 2014. The La Jolla Community Plan is intended to supplement the City General Plan policies by identifying specific community issues and specific policies that build on those already embodied in the General Plan. It identifies a "vision" for development of ~~the~~ La Jolla and contains policies that implement that vision. It also contains implementation strategies that establish the time and financing required to implement the policies of that vision. As presented in Chapter 2, *Environmental Setting*, the project site is identified as "Low-density Residential" in the La Jolla Community Plan (refer to Figure 2-4, *Community Plan Land Use Map*, of the EIR).

La Jolla Community Plan comprises seven elements including Natural Resources and Open Space System, Transportation System, Residential Land Use, Commercial Land Use, Community Facilities, Parks and Services, and Heritage Resources. With the exception of the Transportation System, Commercial Land use and Community Facilities, Parks and Services Elements, goals and recommendations of the remaining elements relevant to the project are presented below in Table 5.1-2, *La Jolla Community Plan and Local Coastal Program Land Use Plan Goals and Policies Consistency Evaluation*.

Land Development Code Regulations

SDMC Chapters 11 through 15 are referred to as the LDC, as they contain the City's planning, zoning, subdivision, and building regulations that regulate how land is to be developed within the City. The LDC contains Citywide base zones that specify permitted land uses, residential density, FAR, and other development requirements for given zoning classifications; as well as overlay zones and supplemental regulations that provide additional development requirements.

General Development Regulations

LDC Chapter 14 includes the general development regulations, supplemental development regulations, building regulations, and electrical/plumbing/mechanical regulations that govern all aspects of project development. The grading, landscaping, parking, signage, fencing, and storage requirements are all contained within the Chapter 14, General Regulations. Also included within the general regulations of Chapter 14 are the ESL Regulations and Historical Resources Regulations, discussed below.

Coastal Overlay Zone/ Coastal Overlay Zone First Public Roadway

The entire site is located within the Coastal Overlay Zone. The Coastal Overlay Zone (described within LCD Chapter 13, Article 2, Division 4) addresses the protection of public access and coastal

resources consistent with the Coastal Act. Development within the Coastal Overlay Zone is subject to the regulations of the LDC, as certified by CCC, and requires a CDP unless exempted by LDC Section 126.070.

As designated on Map Drawing No. C-731, the project site is situated between the first public roadway, in this case La Jolla Boulevard, and the ocean. Thus, a CDP is required and findings must be made to demonstrate that the coastal development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act. As noted above, the project site is located in the appealable area of the Coastal Overlay Zone.

Coastal Height Limit Overlay Zone

The project site is located within the Coastal Height Limit Overlay Zone. The Coastal Height Limit Overlay Zone (described within LCD Chapter 13, Article 2, Division 5) provides a supplemental height limit of 30 feet above grade.

Sensitive Coastal Overlay Zone

The purpose of the Sensitive Coastal Overlay Zone is to help protect and enhance the quality of sensitive coastal bluffs, coastal beaches, and wetlands (as described within LCD Chapter 13, Article 2, Division 6). Any development on property wholly or partially within this overlay zone must comply with the ESL Regulations, described above.

Parking Impact Overlay Zone

The purpose of the Parking Impact Overlay Zone is to provide supplemental parking regulations for specified coastal beach and campus areas that have parking impacts. The intent of this overlay zone is to identify areas of high parking demand and increase the off-street parking requirements accordingly (as described within LCD Chapter 13, Article 2, Division 8).

Transit Area Overlay Zone

Areas in close proximity to transit stops have reduced parking demand, and are allowed reduced off-street parking requirements, as compared to standard requirements (as described within LCD Chapter 13, Article 2, Division 10). The project site is located within walking distance of La Jolla Boulevard where high-quality transit bus service occurs.

Environmentally Sensitive Lands Regulations

The purpose of the ESL Regulations is to protect, preserve and, where damaged restore, the environmentally sensitive lands of San Diego and the viability of the species supported by those lands (LDC Chapter 14, Article 1, Division 1; City of San Diego 2000). These regulations are intended to assure that development, including, but not limited to coastal development in the Coastal Overlay Zone, occurs in a manner that protects the overall quality of the resources and the natural and topographic character of the area, encourages a sensitive form of development, retains biodiversity and interconnected habitats, maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities. These regulations are intended to protect the public health, safety, and

welfare while employing regulations that are consistent with sound resource conservation principles and the rights of private property owners. Environmentally sensitive lands include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and special flood hazard areas (SDMC Chapter 14, Article 3, Division 1; City of San Diego 2006).

Every development proposed on a sensitive coastal bluff (within 100 feet of the bluff edge) will be subject to the ESL Regulations, which require a Site Development Permit (SDP), in accordance with LDC Section 126.0502. In addition to the findings required for the SDP, supplemental findings for ESL must also be made to approve the development. A CDP is required in addition to the SDP for all coastal development proposed within the Coastal Overlay Zone. Deviations from the ESL Regulations within the Coastal Overlay Zone shall be approved only after the decision maker makes an economically viable use determination and findings pursuant to SDMC Section 126.0708.

Applicable resources that are considered ESL consists of sensitive coastal bluffs and a portion of the bluffs contain a FEMA Special Flood Hazard Area; no sensitive biological resources or naturally occurring steep slopes are situated on the project site.

Historical Resources Regulations

SDMC Chapters 11, 12, and 14 establish the Historical Resources Board (HRB) authority, appointment and terms, meeting conduct, and powers and duties; the designation process including the nomination process, noticing and report requirements, appeals, recordation, amendments or rescission, and nomination of historical resources to state and national registers; and development regulations for historical resources. The purpose of these regulations is to protect, preserve, and, where damaged, restore the historical resources of San Diego. The historical resources regulations require that designated historical resources, important archeological sites, and traditional cultural properties be preserved unless deviation findings can be made by the decision maker as part of a discretionary permit. Minor alterations consistent with *The Secretary of the Interior's Standards for the Treatment of Historic Properties* are exempt from the requirement to obtain a separate permit but must comply with the regulations and associated Historical Resources Guidelines (City of San Diego 2001). Limited development may encroach into important archaeological sites if adequate mitigation measures are provided as a condition of approval.

The Historical Resources Guidelines, located in the City's Land Development Manual, provide property owners, the development community, consultants, and the general public explicit guidance for the management of historical resources located within the City's jurisdiction. These guidelines are designed to implement the historical resources regulations and guide the development review process. The guidelines also address the need for a survey and how impacts are to be assessed, available mitigation strategies, and report requirements. They also include appropriate methodologies for treating historical resources located in the City.

Multiple Species Conservation Program/Multi-Habitat Planning Area

The Multiple Species Conservation Program (MSCP) is a County-wide environmental conservation program aimed at preserving San Diego's unique native habitats and wildlife for future generations and is implemented by the MSCP Plan. The Plan's boundaries extend over multiple jurisdictions and environments including regional watersheds and migratory wildlife corridors. The Plan also protects the region's diverse native plant and animal species, including those that are threatened and

endangered. The MSCP also provides provisions and regulations which accommodate future growth and streamline building regulations while protecting natural resources in the region. City of San Diego MSCP Subarea Plan To facilitate inter-jurisdictional coordination and consistency, the MSCP is implemented through subarea plans. The City of San Diego's MSCP Subarea Plan which covered the entire City, was approved in March 1997. The MSCP Subarea Plan includes a process for the issuance of permits under the California Natural Communities Conservation Planning Act of 1991 and the federal and State Endangered Species Act. The MSCP Subarea Plan also provides guidance for simultaneous growth of local economies while protecting of sensitive species and to conserving regional biodiversity.

Within the MSCP Subarea Plan area are Multi-Habitat Planning Areas (MHPAs) which will make up the bulk of the City's final MSCP Preserve at the end of the 50-year permit. The City's MHPAs allow "limited development permitted based on the development area allowance of the OR-1-2 zone [open space residential zone]." The MHPA boundaries can be adjusted given that the new boundaries enhance the biological value of the MHPA and must be approved by the applicable wildlife agencies and the City.

5.1.3 Impact: Environmental Goals

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

Issue 2: Would the project require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment?

5.1.3.1 Impact Thresholds

According to the City's Significance Determination Thresholds (2022), land use policy impacts related to environmental goals may be significant if the project would be:

- Inconsistent or conflict with the environmental goals, objectives, or guidelines of a community or General Plan;
- Inconsistent or conflict with an adopted land use designation or intensity and result in indirect or secondary environmental impacts;
- Substantially incompatible with an adopted plan; or
- Significantly increase the base flood elevation for upstream properties or construct in a Special Flood Hazard Area (SFHA) or floodplain/wetland buffer zone.

5.1.3.2 Impact Analysis

City of San Diego General Plan

The City of San Diego General Plan designates the project site as "Residential-Low" which provides for both single-family and multifamily housing within a low-density range (i.e., 5 to 9 du/ac). Construction of the proposed residence would be consistent with that designation. The project would not result in a land use conflict because it proposes a residential use and is consistent with

the Residential land use designation in the La Jolla Community Plan, which acts as the community-specific policy document for the General Plan. The relevant goals and policies of the General Plan for the project and a discussion of project's policy consistency are presented in **Table 5.1-1**, *City of San Diego General Plan Land Use Goals, Objectives, and Policies Consistency Evaluation*, at the end of this section.

As noted in Table 5.1-1, the Project would comply with all relevant policies in the Mobility Element of the General Plan related to pedestrian circulation. Policy ME-A.5 within the Safety and Accessibility Section provides guidelines for sidewalk design. Consistent with the goal of "Minimize obstructions and barriers that inhibit pedestrian circulation," although the project would include driveway width and visibility triangle modifications, the project is conditioned to install convex mirror(s) adjacent to the garage door openings and/or pedestrian-alerting devices. Mirrors and/or devices will be placed to facilitate the detection of pedestrians, vehicles, or other obstructions when exiting the garage. Additionally, the existing sidewalk would be replaced to comply with current City Standards.

Consistency with the Urban Design Element of the General Plan relates to the proximity of the development to natural features, in this case the Pacific Ocean and its coastline, and consistency with the character of the surrounding community. The project's architecture and landscape treatments combined with the rehabilitation of the historic garage, stucco private wall and entry along the frontage would provide visual consistency and maintain the historical context of the property.

The project would provide on-site water, sewer, and stormwater infrastructure that are sized based on the project's demands, and levels of service would be maintained after project construction is complete, consistent with the Public Facilities, Services, and Safety Element of the General Plan. The project design also incorporates the recommendations for seismic and other geologic hazards from the project-specific geotechnical investigation in accordance with the seismic safety goals of the element. The project would implement green building techniques in accordance with the California Building Code (CBC), GHG reduction strategies in the project's CAP Consistency Checklist, consistent with the City's goals concerning sustainability contained in the Conservation Element. With regard to coastal vista policy in the Conservation Element, the project would not affect designated public vistas but would create a view corridors along the northern and southern property lines where none exists. In addition, the project includes basins and a sump pump to collect runoff and pump it away from the coastal bluff toward the off-site stormwater system, in accordance with the urban runoff goals of the Conservation Element. However, because the project would demolish a designated historical resource, the project would be inconsistent with the goals of the Historic Preservation Element. The project's inconsistency with the historical resources goals in the Historic Preservation Element results in a secondary impact to the existing Casa De Los Amigos residence (namely its demolition), resulting in a significant land use policy impact.

La Jolla Community Plan

The project is located within the La Jolla Community Plan. The relevant goals and policies of the La Jolla Community Plan for the project and a discussion of project consistency are presented in **Table 5.1-2**, *La Jolla Community Plan Goals and Recommendations Consistency Evaluation*, at the end of this section. As noted in the table, the project would be consistent with the geologic conditions and visual resources policies of the Natural and Cultural Resources Element. It would comply with the City requirement with a setback from the coastal bluff edge, as demonstrated in the site-specific

geotechnical investigation and would be set back farther from the coastal bluffs than the existing residential structure. Recordation of a COE combined with removal of the existing walls and staircases would further protect the coastal bluff consistent with the Natural and Cultural Resources Element. The project's parking requirements would be met through the integration of a parking lift system in the rehabilitated garage structure, consistent with the Transportation system Element. The project would be designed with high quality materials that would maintain the community character of the Lower Hermosa neighborhood in a way that respects the coastal bluffs, visual resources and public access described in the Residential Land Use Element. However, despite the implementation of historical resources mitigation, the proposed demolition of HRB Site #1481 would be inconsistent with the Historic Preservation Element policy, HP-A.5. Designate and preserve significant historical and cultural resources for current and future generations" directed at preserving the heritage of local landmarks and would be inconsistent with the Heritage Resources Element.

Land Development Code/General Regulations

The RS-1-5 Zone allows for single-family residential development on the project site. The project entails the removal of a legally non-conforming single-family residence and the construction of a new single-family residence on a previously developed bluff top lot. The proposed structure and site plan would comply with the RS-1-5 residential zone development regulations related to side yard setbacks, building height, lot coverage, and floor area ratio. The project proposes modifications related to driveway width and visibility triangles to accommodate the existing historically designated detached garage and stucco privacy wall. Maintaining the stucco privacy wall would require the retention of the existing legal non-conforming two-car garage structure which is detached from the existing residence. As noted in Chapter 3, *Project Description*, approval of a CDP, SDP, and NDP would be required to authorize the proposed structure and other site improvements, in accordance with the LDC.

Coastal Overlay Zone/ Coastal Overlay Zone First Public Roadway

Development of the project within the Coastal Overlay Zone requires approval of a CDP. The CDP would require findings that demonstrate that the project is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act. Among other features that implement the intent of the CDP regulations, the project would integrate view corridors, where none exist today, along the southern and northern property lines by establishing conforming side yard setbacks where feasible, removing sections of existing historic privacy wall that currently block views, replacing the removed wall with open fencing along the public streetscape, and installing low-growing landscape materials to prevent intrusion into the view corridors. In addition, the project would not encroach upon any existing physical accessway that is legally used by the public or any proposed public accessway identified in an LCP land use plan (refer to **Figure 5.1-1**, *Visual Access*). In addition, the proposed site drainage would mitigate any further bluff edge retreat and/or erosion by collecting stormwater and directing runoff to the sump basin to be pumped via an under-sidewalk. No public access or recreation facilities exist on or adjacent to the site and the project would not adversely impact public recreation opportunities or access in the area. Therefore, the project would be in conformance with the public access and public recreation policies of Chapter 3 of the California Coastal Act.

Coastal Height Limit Overlay Zone

The proposed residence would be two stories of residential living area, over a daylight basement level, resulting in a residential structure that would be approximately 30 feet in height above finished grade. Thus, the proposed residence would comply with the 30-foot height limit within the Coastal Height Limit Overlay Zone.

Sensitive Coastal Overlay Zone

The project would protect and enhance the quality of sensitive coastal bluffs by removing the existing non-conforming structure, basement and surrounding artificial fill and placing the new ground-floor basement level (containing indoor living space and outdoor patio area) at a setback distance of 40 feet from the on-site coastal bluffs, in accordance with the ESL regulations. The first and second floors of the residence would be set back 25 feet from the bluff edge, which is demonstrated to be stable by the geotechnical engineering investigation and wave runup study prepared for the project (refer to Section 5.2, *Geologic Conditions*, for discussion), even after accounting for sea level rise. The proposed 25-foot setback from the coastal bluff edge would require approval of a reduction from the 40-foot setback requirement in the SDMC, as described further under Section 5.2, *Geologic Conditions*. The existing coastal bluff features (i.e., staircases and stone/mortar walls on the western portion of the property) would be removed and a Covenant of Easement (COE) would be recorded to protect the coastal bluffs in perpetuity. The project would collect stormwater and direct runoff to a sump basin to be pumped to storm drain systems in Camino De La Costa. Thus, removing the existing structure and artificial fill, stabilizing the bluff edge through the removal of existing improvements, redirecting runoff toward the public street, and recordation of the COE would prevent any further impacts off the bluff edge in accordance with the SDMC regulations protecting sensitive coastal resources.

Parking Impact Overlay Zone

The project's parking requirements would be satisfied by installing a lift system inside the rehabilitated historic garage to accommodate four parking spaces (i.e., two resident and two guest spaces). The requested modification for driveway width, as outlined in Table 3-1 (Proposed Modifications) exceeds what is permitted within the Parking Impact Overlay Zone, specifically within the Beach Impact Area; however, no changes to the existing off-street parking supply would occur as a result of the project given the entire western side of Camino de la Costa is red curb along that block.

Transit Area Overlay Zone

Although located in a Transit Area Overlay Zone, the project would provide four parking spaces on site in accordance with the parking regulations of the SDMC.

Land Development Code/ESL Regulations

The project would demolish a historically designated local resource and proposes residential development in a sensitive coastal zone area of the City. As demonstrated herein and in Section 5.2, *Geologic Conditions*, Section 5.3, *Historical Resources*, Section 5.4, *Hydrology*, and Section 5.5, *Water Quality*, the project would not adversely affect the applicable land uses plans because it would

comply with the planned site use and the intent of the Community and General Plan policies; it would not be detrimental to public health and safety because the project site is geologically stable based on evidence presented in the preliminary geotechnical investigation; and it would comply with the applicable regulations in the LDC through its design and rehabilitation of historic garage and privacy wall along Camino De La Costa. Furthermore, the project site is considered suitable for residential redevelopment, the project would not alter any natural landforms or would present an undue risk from geologic or erosion forces or flood hazards; removal of the existing structure and artificial fill and redirection of on-site runoff would result in a project that prevents adverse impacts on adjacent the sensitive coastal bluff; no impacts to biologically sensitive lands protected by the MSCP would occur as there is no MHPA nearby; and the proposed development would not contribute to the erosion of public beaches or the local shoreline sand supply. However, the project would be inconsistent with applicable goals, policies, and objectives in the Historic Preservation Element of the General Plan and Heritage Resources element of the La Jolla Community Plan, as described in Tables 5.1-1 and 5.1-2.

Land Development Code/Historical Resources Regulations

The project proposes the demolition of a single-family residence that is listed as a locally important historical resource (HRB Site #1481) and is recommended as eligible for listing in the California Register of Historic Resources (CRHR), which is considered a substantial adverse change to the historical resource pursuant to CEQA Section 21084.1 and necessitates an SDP. The detached garage and stucco privacy wall would be retained and rehabilitated in accordance with the U.S. Secretary of the Interior Standards for Rehabilitation. Evaluation of the project impacts in the Historical Resources Technical Report (HRTR; Appendix D), review of the project by the City's HRB and implementation of the mitigation measures identified in Section 5.3, *Historical Resources*, would be in accordance with the Historical Resources Regulations in the LDC.

5.1.3.3 Significance of Impact

The project would be consistent with applicable goals, policies, and objectives of the General Plan and the La Jolla Community Plan, with the exception of goals contained in the Historic Preservation Element of the General Plan and Heritage Resources Element of the La Jolla Community Plan, as described in Tables 5.1-1 and 5.1-2. The project's inconsistency with these goals and policies would result in a secondary physical impact to the HRB Site #1481 (namely its demolition), resulting in a significant land use policy conflict. Apart from modifications associated with the driveway, the project would be consistent with the LDC regulations pertaining to Coastal Overlay Zone/Coastal Overlay Zone First Public Roadway, Coastal Height Limit Overlay Zone, Sensitive Coastal Overlay Zone, Parking Impact Overlay Zone, and Transit Area Overlay Zone, as well as the LDC/Historical Resources Regulations pertaining to procedures related to the treatment of historical resources. As such, the project would result in a significant land use impact.

5.1.3.4 Mitigation Monitoring and Reporting

Implementation of mitigation measures described in Section 5.3, *Historical Resources*, would mitigate the secondary physical impacts of demolishing a listed historic resource consistent with the Historical Resources Regulations in the LDC. However, because resource demolition is not consistent with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, the project would

be inconsistent with City goals and policies embodied in the General Plan and Community Plan intended to protect and preserve historical resources, resulting in a significant land use impact that is unmitigated.

5.1.4 Impact: MSCP Subarea Plan

Issue 3: Would the project result in a conflict with the provisions of the City's MSCP Subarea Plan or other approved local, regional, or state habitat conservation plan?

5.1.4.1 Impact Thresholds

According to the City's Significance Determination Thresholds (2022), land use policy impacts may be significant for this issue if the project would be:

- Inconsistency/conflict with adopted environmental plans for an area.

5.1.4.2 Impact Analysis

The project site is developed and does not contain nor is it adjacent to sensitive biological resources that are protected by policies in the MSCP Subarea Plan or Vernal Pool Habitat Conservation Plan (VPHCP). There is no MHPA nearby that would be affected by the proposed redevelopment of the site.

5.1.4.3 Significance of Impact

No impacts to sensitive biological resources would occur and no inconsistencies with applicable policies of the MSCP or VPHCP would occur.

5.1.4.4 Mitigation Monitoring and Reporting

No mitigation is required.

5.1.5 Impact: Established Community

Issue 4: Would the project physically divide an established community?

5.1.5.1 Impact Thresholds

Land use policy impacts related to established communities may be significant if the project would:

- Physically divide an established community

5.1.5.2 Impact Analysis

The project site is located in the Lower Hermosa neighborhood of the La Jolla Community Plan area. The project site contains an existing single-family residence that has been developed as such for 100 years that is surrounded by other single-family residences. The 6110 Camino De La Costa project would demolish and replace the existing structure with a new single-family residence within the

confines of the existing property lines. The project would not physically divide an established community because the proposed structure would be placed on a site designated and zoned for low density residential use on a property surrounded by residential uses and located between a public road and the Pacific Ocean. No impacts would occur.

5.1.5.3 Significance of Impact

None of the proposed improvements would physically divide an established community; no impacts to land use would occur.

5.1.5.4 Mitigation Monitoring and Reporting

No mitigation is required.

5.1.6 Impact: Incompatible with ALUCP

Issue 5: Would the project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP), including aircraft noise levels as defined by the plan?

5.1.6.1 Impact Thresholds

According to the City's Significance Determination Thresholds (2022), land use policy impacts may be significant if the project would be:

- Incompatible uses as defined in an airport land use plan or inconsistency with an airport's Comprehensive Land Use Plan (CLUP) as adopted by the Airport Land Use Commission (ALUC).

5.1.6.2 Impact Analysis

The San Diego International Airport (SDIA) is located approximately 7.5 miles southeast of the project site, Montgomery Field Airport is located approximately 8 miles east of the site, and Marine Corps Air Station Miramar is located approximately 7 miles northeast of the project site. The project site is outside of the Airport Influence Areas for San Diego International and Montgomery Field airports and for Marine Corps Air Station Miramar (County of San Diego 2014, 2010, 2011b). Lastly, the project site is not located within the vicinity of a private airstrip, public air strip, or heliport facility. Therefore, the project would not be incompatible with any ALUCP in terms of safety and noise.

5.1.6.3 Significance of Impact

The project site is not located within any of the safety or noise zones identified in any ALUCP; no impacts would occur.

5.1.6.4 Mitigation Monitoring and Reporting

No mitigation is required.

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN		
Mobility Element		
Safety and Accessibility *Policy ME-A.5.* Provide adequate sidewalk widths and clear path of travel, as determined by street classification, adjoining land uses, and expected pedestrian usage. a. Minimize obstructions and barriers that inhibit pedestrian circulation. b. Consider pedestrian impacts when designing the width and number of driveways within a street segment.	The existing sidewalk along Camino De La Costa would be repaired or replaced, as needed, and the existing driveway would be relocated and widened to access the rehabilitated historic garage from the public right-of-way. Due to the location of the new driveway, the project would require modifications for the proposed driveway width and visibility triangles. To address pedestrian and vehicular safety, the project is conditioned to install convex mirror(s) adjacent to the garage door openings and/or pedestrian-alerting devices. The mirrors and/or devices would be placed to facilitate the detection of pedestrians, vehicles, or other obstructions when exiting the garage. As such, there would be no barriers or obstructions to pedestrian circulation as a result of the project. Therefore, the project would be consistent with Policy ME-A.5.	Yes
Urban Design Element		
Development Adjacent to Natural Features and Park Lands *Policy UD-A.3.* Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development. a. Protect views from public roadways and parklands to natural canyons, resource areas, and scenic vistas.	The project site is adjacent to the Pacific Ocean coastline, a natural feature. The project has been designed to achieve a harmonious visual relationship between the bulk and scale of the existing and adjacent residences. Except for necessary modifications for driveway width and visibility triangle dimensions the project would comply with all development regulations and observe the 30-foot height requirements. The residence would be set back 25 feet from the coastal bluffs (as compared to the existing residence which is located along the bluff edge), while the basement level would be set back 40 feet. The existing bluff-side improvements would be removed and a COE recorded to protect the coastal bluffs in perpetuity. Removal of the existing residence and portions of the privacy wall along the street frontage and establishment of a deed-restricted view	Yes

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
	corridors along the southern and northern property lines behind the historic features would increase visibility through the property to the coastline, consistent with Policy UD-A.3.	

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Architecture *Policy UD-A.5.* Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context. a. Relate architecture to San Diego's unique climate and topography. b. Encourage designs that are sensitive to the scale, form, rhythm, proportions, and materials in proximity to commercial areas and residential neighborhoods that have a well-established, distinctive character. c. Provide architectural features that establish and define a building's appeal and enhance the neighborhood character. d. Encourage the use of materials and finishes that reinforce a sense of quality and permanence. e. Provide architectural interest to discourage the appearance of blank walls for development. This would include not only building walls, but fencing bordering the pedestrian network, where some form of architectural variation should be provided to add interest to the streetscape and enhance the pedestrian experience. For example, walls could protrude, recess, or change in color, height, or texture to provide visual interest. f. Design building wall planes to have shadow relief, where pop-outs, offsetting planes, overhangs and recessed doorways are used to provide visual interest at the pedestrian level. h. Acknowledge the positive aspects of nearby existing buildings by incorporating compatible features in new developments. i. Maximize natural ventilation, sunlight, and views. j. Design roofs to be visually appealing when visible from public vantage points and public rights-of-way.	Consistent with Policy UD-A.5, the new residential structure is designed in a contemporary style of architecture. The highly transparent structure would reflect the San Diego climate and afford views of the Pacific Ocean from inside the residence and along the southern and northern view corridors. The new building would be constructed west of the historic garage and stucco privacy walls. Retention of the historic garage and stucco wall would largely maintain the visual appearance of the site directly abutting Camino De La Costa, although new garage doors would be installed to access the structure directly from the road. The new garage doors would be designed to eliminate the existing blank wall while maintaining the visual appearance of the historic garage structure. Updated landscaping would be installed throughout the property to enhance and compliment the architectural features and provide texture and visual interest. Three additional street trees would be added to enhance the streetscape along the frontage of the property. The project would be consistent with Policy UD-A.5.	Yes

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Policy UD-A.6. Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience. a. Locate buildings on the site so that they reinforce street frontages. b. Relate buildings to existing and planned adjacent uses. c. Ensure that building entries are prominent, visible, and well-located. d. Maintain existing setback patterns, except where community plans call for a change to the existing pattern. e. Minimize the visual impact of garages, parking and parking portals to the pedestrian and street façades.	The project would maintain the existing historic entry to the property, including artwork and arched entry. The amount of landscaping near the front of the new residence would increase. Because the project proposes to preserve and rehabilitate the existing garage and stucco wall, it would maintain the existing front yard setback on the property. The new garage doors would break up the solid blank wall that currently interfaces with the streetscape of Camino De La Costa. The project would be consistent with Policy UD-A.6	Yes
Historic Character *Policy UD-A.7.* Respect the context of historic streets, landmarks, and areas that give a community a sense of place or history. A survey may be done to identify "conservation areas" that retain original community character insufficient quantity and quality but typically do not meet designation criteria as an individual historical resource or as a contributor to a historical district. b. Review the redevelopment of property within conservation areas to maintain important aspects of the surviving community character that have been identified as characteristics of a neighborhood that could be preserved.	The project proposes retention and rehabilitation of the historic garage and stucco privacy wall facing Camino De La Costa that would preserve the historical character of the adjacent streetscape. The project is located in the Lower Hermosa neighborhood that contains single family residences of varying architectural styles. Because the neighborhood and surrounding area do not follow a single or common architectural theme, the project would not result in visual impacts by using architectural styles or building materials that differ from the surrounding development. While the project would result in the physical loss of a historic residence, the structure is not a community identification symbol or landmark identified in the General Plan or the La Jolla Community Plan and Local Coastal Program Land Use Plan. The project would be consistent with Policy UD-A.7.	Yes
Landscape *Policy UD-A.8.* Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.	The project would feature enhanced landscaping including more canopy trees than required by the SDMC. The project would comply with street tree species recommendation in the Coastal Zone and integrate water conserving shrubs and plantings into the landscape. Landscape materials and design would	Yes

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
a. Maximize the planting of new trees, street trees and other plants for their shading, air quality, and livability benefits (see also Conservation Element, Policies CE-A.11, CE-A.12, and Section J). b. Use water conservation through the use of drought- tolerant landscape, porous materials, and reclaimed water where available. c. Use landscape to support storm water management goals for filtration, percolation, and erosion control. d. Use landscape to provide unique identities within neighborhoods, villages and other developed areas. e. Landscape materials and design should complement and build upon the existing character of the neighborhood. f. Design landscape bordering the pedestrian network with new elements, such as a new plant form or material, at a scale and intervals appropriate to the site. This is not intended to discourage a uniform street tree or landscape theme, but to add interest to the streetscape and enhance the pedestrian experience. g. Establish or maintain tree-lined residential and commercial streets. Neighborhoods and commercial corridors in the City that contain tree-lined streets present a streetscape that creates a distinctive character. • Identify and plant trees that complement and expand on the surrounding street tree fabric. • Unify communities by using street trees to link residential areas. • Locate street trees in a manner that does not obstruct ground illumination from streetlights. h. Shade paved areas, especially parking lots.	complement and build upon the existing character of the Lower Hermosa neighborhood. The project site plan would result in an increase in permeable surfaces (i.e., approximately 480 SF more than exists) and all stormwater would be captured, collected, and pumped away from the coastal bluffs and toward existing infrastructure in the street. The project would be consistent with Policy UD-A.8.	

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
i. Demarcate public, semi-public/private, and private spaces clearly through the use of landscape, walls, fences, gates, pavement treatment, signs, and other methods to denote boundaries and/or buffers. j. Reduce barriers to views or light by selecting appropriate tree types, pruning thick hedges, and large overhanging tree canopies.		
<u>*Lighting*</u> *Policy UD-A.13.* Provide lighting from a variety of sources at appropriate intensities and qualities for safety. a. Provide pedestrian-scaled lighting for pedestrian circulation and visibility. b. Use effective lighting for vehicular traffic while not overwhelming the quality of pedestrian lighting. c. Use lighting to convey a sense of safety while minimizing glare and contrast. d. Use vandal-resistant light fixtures that complement the neighborhood and character. e. Focus lighting to eliminate spill-over so that lighting is directed, and only the intended use is illuminated.	New lighting would be provided consistent with the outdoor lighting regulations in SDMC §142.0740. The proposed lighting would complement the on-site architecture and prevent overspill into the adjacent properties and neighborhood, consistent with Policy UD-A.13.	Yes
<u>*Residential Design*</u> *Policy UD-B.1.* Recognize that the quality of a neighborhood is linked to the overall quality of the built environment. Projects should not be viewed singularly, but viewed as part of the larger neighborhood or community plan area in which they are located for design continuity and compatibility. a. Integrate new construction with the existing fabric and scale of development in surrounding neighborhoods. Taller or denser development is not necessarily inconsistent with older, lower-density neighborhoods but must be designed with sensitivity to	The project proposes the retention and rehabilitation of the historic garage and stucco privacy wall facing Camino De La Costa which would preserve the historical streetscape and respect the pedestrian sidewalk. The project is located in a single-family residential neighborhood that contains varying architectural styles. Because the neighborhood and surrounding area do not follow a single or common architectural theme, the project would not result in visual impacts by using architectural styles or building materials that differ from the surrounding development. The proposed residence would comply with the residential	Yes

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
existing development. For example, new development should not cast shadows or create wind tunnels that will significantly impact existing development and should not restrict vehicular or pedestrian movements from existing development. b. Design new construction to respect the pedestrian orientation of neighborhoods.	density, building height and scale regulations in the underlying zone. The project would be consistent with Policy UD-B.1.	
<u>*Residential Street Frontages*</u> *Policy UD-B.4.* Create street frontages with architectural and landscape interest for both pedestrians and neighboring residents. a. Locate buildings on the site so that they reinforce street frontages. b. Relate buildings to existing and planned adjacent uses. c. Provide ground level entries and ensure that building entries are prominent and visible. d. Maintain existing setback patterns, except where community plans call for redevelopment to change the existing pattern e. Locate transparent features such as porches, stoops, balconies, and windows facing the street to promote a sense of community. f. Encourage side- and rear-loaded garages. Where not possible, reduce the prominence of the garage through architectural features and varying planes. g. Minimize the number of curb-cuts along residential streets.	The project proposes retention and rehabilitation of the historic garage and stucco privacy wall facing Camino De La Costa which would preserve the historical streetscape and respect the pedestrian sidewalk. Access to the historic garage would be shifted to the street and a single curb cut would be created consistent with other residential buildings in the project area. The historic gated entries to the property would be retained. Transparent glass would be utilized along the facades of the new residence. The project would be consistent with Policy UD-B.4.	Yes

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Public Facilities, Services, and Safety Element		
Evaluation of Growth, Facilities, and Services Goals Adequate public facilities that are available at the time of need and public facilities exactions that mitigate the facilities impacts that are attributable to new development. *Policy PF-C.1.* Require development proposals to fully address impacts to public facilities and services. a. Identify the demand for public facilities and services resulting from discretionary projects. b. Identify specific improvements and financing which would be provided by the project, including but not limited to sewer, water, storm drain, solid waste, fire, police, libraries, parks, open space, and transportation projects. c. Subject projects, as a condition of approval, to exactions that are reasonably related and in rough proportionality to the impacts resulting from the proposed development. d. Provide public facilities and services to assure that current levels of service are maintained or improved by new development within a reasonable time period.	The project would abandon the existing water service connection and construct a new connection (of the same size as the existing connection) to the water service main in Camino De La Costa, slightly west of the existing connection. All other utilities would be served by connections to the existing structure. No sizing upgrades are proposed, consistent with Policy PF-C.1.	Yes
Wastewater Goals Environmentally sound collection, treatment, reuse, disposal, and monitoring of wastewater and increased use of reclaimed water to supplement the region's limited water supply. *Policy PF-F.6.* Coordinate land use planning and wastewater infrastructure planning to provide for future development and maintain adequate service levels.	On-site wastewater infrastructure would be designed and sized to meet the project's needs in conformance with City standards consistent with Policy PF-F.6.	Yes

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<u>*Stormwater Infrastructure Goals*</u> Protection of beneficial water resources through pollution prevention and interception efforts; and a storm water conveyance system that effectively reduces pollutants in urban runoff and storm water to the maximum extent practicable. *Policy PF-G.1.* Ensure that all storm water conveyance systems, structures, and maintenance practices are consistent with federal Clean Water Act and California Regional Water Quality Control Board NPDES [National Pollutant Discharge Elimination System] Permit standards. *Policy PF-G.2.* Install infrastructure that includes components to capture, minimize, and/or prevent pollutants in urban runoff from reaching receiving waters and potable water supplies. *Policy PF-G.5.* Identify and implement BMPs for projects that repair, replace, extend or otherwise affect the storm water conveyance system. These projects should also include design considerations for maintenance, inspection, and, as applicable, water quality monitoring.	All stormwater conveyance systems, structures, and maintenance practices would be consistent with the Clean Water Act and California Regional Water Quality Control Board NPDES Permit standards and City's stormwater regulations to protect water quality, as discussion in Section 5.5, *Water Quality*. The project would, therefore, be consistent with Policies PF-G.1, PF-G.2, and PF-G.5.	Yes
<u>*Public Utilities Goals*</u> Public utilities services provided in the most cost-effective and environmentally sensitive way; and public utilities that sufficiently meet existing and future demand with facilities and maintenance practices that are sensible, efficient, and well-integrated into the natural and urban landscape. *Policy PF-M.3.* Integrate the design and siting of safe and efficient public utilities and associated facilities into the early stages of long range planning and development process, especially in redevelopment/urban areas where land constraints exist.	The project would construct the utilities connections to service the project, including water, sewer, and stormwater systems to connect with existing off-site utilities within the adjacent public road. The sizing of the lines would be based on demand from the project. Levels of service would be maintained after project construction is complete and fully occupied, as described in Section 7.1.14, *Utilities and Service Systems*. The project would be consistent with Policy PF-M.3.	Yes

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Seismic Safety Goals Protection of public health and safety through abated structural hazards and mitigated risks posed by seismic conditions; and development that avoids inappropriate land uses in identified seismic risk areas. *Policy PF-Q.1.* Protect public health and safety through the application of effective seismic, geologic, and structural considerations. a. Ensure that current and future community planning and other specific land use planning studies continue to include consideration of seismic and other geologic hazards. This information should be disclosed, when applicable, in the California Environmental Quality Act (CEQA) document accompanying a discretionary action. c. Require the submission of geologic and seismic reports, as well as soils engineering reports, in relation to applications for land development permits whenever seismic or geologic problems are suspected. g. Adhere to state laws pertaining to seismic and geologic hazards.	The project design incorporates the recommendations for seismic and other geologic hazards from the project-specific geotechnical investigation (Christian Wheeler Engineering 2023), consistent with Policy PF-Q.1, as discussed in detail in Section 5.2, *Geologic Conditions*.	Yes
Conservation Element		
Climate Change and Sustainable Development Goals To reduce the City's overall carbon dioxide footprint by promoting energy efficiency, alternative modes of transportation, sustainable planning and design, and waste management; to be prepared for, and able to adapt to adverse climate change impacts; and to become a city that is an international model of sustainable development and conservation. *Policy CE-A.5.* Employ sustainable or "green" building techniques for the construction and operation of buildings. a. Develop and implement sustainable building standards for new and significant remodels of residential and commercial buildings to maximize energy efficiency, and to achieve overall net zero energy consumption by 2020 for new residential buildings and	The project would implement green building techniques in accordance with the CBC and the project's CAP Consistency Checklist and comply with the City's goals concerning sustainability contained in Policies CE-A.5, CE-A.7, and CE-A.9.	Yes

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
2030 for new commercial buildings. This can be accomplished through factors including, but not limited to: • Designing mechanical and electrical systems that achieve greater energy efficiency with currently available technology; • Minimizing energy use through innovative site design and building orientation that addresses factors such as sun-shade patterns, prevailing winds, landscape, and sun-screens; • Employing self-generation of energy using renewable technologies; • Combining energy efficient measures that have longer payback periods with measures that have shorter payback periods; • Reducing levels of non-essential lighting, heating, and cooling; and • Using energy efficient appliances and lighting.		
Policy CE-A.8. Reduce construction and demolition waste in accordance with Public Facilities Element, Policy PF-I.2, or by renovating or adding on to existing buildings, rather than constructing new buildings. *Policy CE-A.9.* Reuse building materials, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent possible, through factors including: • Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases; • Using life cycle costing in decision-making for materials and construction techniques. Life cycle costing analyzes the costs and benefits over the life of a particular product, technology, or system;	The project would comply with the City's storage and recycling ordinances and be consistent with Policies CE-A.8, CE-A.9 and CE-A.10, as discussed in Section 7.1.14, *Utilities and Service Systems*. Sustainable landscape design principals were followed when developing the project's landscape design including using drought tolerant plant material, planting more shade trees than required by the LDC, and installing permeable pavers, consistent with Policies CE-A.11 and 12.	Yes

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
• Removing code obstacles to using recycled materials in buildings and for construction; and • Implementing effective economic incentives to recycle, Policy construction and demolition debris (see also Public Facilities Element PF-I.2). *Policy CE-A.10.* Include features in buildings to facilitate recycling of waste generated by building occupants and associated refuse storage areas: a. Provide permanent, adequate, and convenient space for individual building occupants to collect refuse and recyclable material. b. Provide a recyclables collection area that serves the entire building or project. The space should allow for the separation, collection and storage of paper, glass, plastic, metals, yard waste and other materials as needed. *Policy CE-A.11.* Implement sustainable landscape design and maintenance. a. Use integrated pest management techniques, where feasible, to delay, reduce, or eliminate dependence on the use of pesticides, herbicides, and synthetic fertilizers. b. Strategically plant deciduous shade trees, evergreen trees, and drought tolerant native vegetation, as appropriate, to contribute to sustainable development goals. c. Reduce use of lawn types that require high levels of irrigation. d. Strive to incorporate existing mature trees and native vegetation into site designs. e. Minimize the use of landscape equipment powered by fossil fuels. f. Implement water conservation measures in site/building design and landscaping.		

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
g. Encourage the use of high-efficiency irrigation technology, and recycled site water to reduce the use of potable water for irrigation. Use recycled water to meet the needs of development projects to the maximum extent feasible (see Policy CE-A.12). *Policy CE-A.12.* Reduce the San Diego Urban Heat Island, through actions such as: • Using cool roofing materials, such as reflective, low-heat retention tiles, membranes, and coatings, or vegetated eco-roofs to reduce heat build-up; • Planting trees and other vegetation, to provide shade and cool air temperatures. In particular, properly position trees to shade buildings, air conditioning units, and parking lots;		
<u>*Coastal Resources*</u> *Policy CE-C.3.* Minimize alterations of cliffs and shorelines to limit downstream erosion and to ensure that sand flow naturally replenishes beaches. *Policy CE-C.6.* Implement watershed management practices designed to reduce runoff and improve the quality of runoff discharged into coastal waters. *Policy CE-C.8.* Protect coastal vistas and overlook areas from obstructions and visual clutter where it would negatively affect the public's reasonable use and enjoyment of the resource.	Consistent with Policy CE-C.3, the project would demolish the existing residence situated atop the coastal bluff and relocate the new residence to 25 to 40 feet back from the coastal bluff. All existing structures along the bluff would be removed and no shoreline protection devices are proposed that would impede sand replenishment. A COE would be recorded over the coastal bluffs on site to protect them in perpetuity. The project's drainage system would capture and treat all stormwater from site, and would pump it to infrastructure in the nearest public road to prevent discharge to coastal waters, as prescribed in Policy CE-C.6. There are no scenic vistas on site and the closest public vista is situated 0.15 miles south of the project in a location where the project would not be visible when viewed from the overlook area, consistent with Policy CE-C.8. View corridors would be established along the southern and northern property lines.	Yes

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<u>*Urban Runoff Management Goals*</u> Protection and restoration of water bodies, including reservoirs, coastal waters, creeks, bays, and wetlands; and preservation of natural attributes of both the floodplain and floodway without endangering life and property. *Policy CE-E.2.* Apply water quality protection measures to land development projects early in the process-during project design, permitting, construction, and operations-in order to minimize the quantity of runoff generated on-site, the disruption of natural water flows and the contamination of storm water runoff. a. Increase on-site infiltration, and preserve, restore, or incorporate natural drainage systems into site design. b. Direct concentrated drainage flows away from the MHPA and open space areas. If not possible, drainage should be directed into sedimentation basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA or open space areas. c. Reduce the amount of impervious surfaces through selection of materials, site planning, and street design where possible. d. Increase the use of vegetation in drainage design. e. Maintain landscape design standards that minimize the use of pesticides and herbicides. f. Avoid development of areas particularly susceptible to erosion and sediment loss (e.g., steep slopes) and, where impacts are unavoidable, enforce regulations that minimize their impacts. g. Apply land use, site development, and zoning regulations that limit impacts on, and protect the natural integrity of topography, drainage systems, and water bodies. h. Enforce maintenance requirements in development permit conditions.	A minor decrease in runoff would occur under the project due to the reduction in impervious surface area. The project would comply with the City's Stormwater Manual by installing drainage basins to collect and treat runoff before it is pumped to the off-site stormwater system in the public road. As discussed in Section 5.4, *Hydrology*, and Section 5.5, *Water Quality*, the project would comply with drainage and water quality requirements, including those of the City and Regional Water Quality Control Board. Compliance with the water quality standards is ensured through permit conditions provided by LDR Engineering. The project would be in conformance with Policies CE-E.2, CE-E.3, and CE-E.6.	Yes

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Policy CE-E.3. Require contractors to comply with accepted storm water pollution prevention planning practices for all projects. a. Minimize the amount of graded land surface exposed to erosion and enforce erosion control ordinances. b. Continue routine inspection practices to check for proper erosion control methods and housekeeping practices during construction. *Policy CE-E.6.* Continue to encourage "Pollution Control" measures to promote the proper collection and disposal of pollutants at the source, rather than allowing them to enter the storm drain system. a. Promote the provision of used oil recycling and/or hazardous waste recycling facilities and drop-off locations. b. Review plans for new development and redevelopment for connections to the storm drain system. c. Follow up on complaints of illegal discharges and accidental spills to storm drains, waterways, and canyons.		
<u>*Sustainable Energy Goal*</u> An increase in local energy independence through conservation, efficient community design, reduced consumption, and efficient production and development of energy supplies that are diverse, efficient, environmentally sound, sustainable, and reliable. *Policy CE-I.4.* Maintain and promote water conservation and waste diversion programs to conserve energy.	The project would adhere to the energy requirements of the CBC and would minimize its energy demands by installing solar energy system to produce on-site electrical power. The project would also implement CAP requirements for water-conserving plumbing, as noted in Section 7.1.5, *Greenhouse Gas Emissions*. All landscape and irrigation would conform to the Landscape Regulations and Landscape Standards of the LDC and other applicable City and regional standards. Drought-tolerant plant materials would be incorporated into the landscape plan. Therefore, the project would be consistent with Policy CE-1.4.	Yes

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Historic Preservation Element		
Policy HP-A.5.e. Encourage continued use and adaptive reuse of designated historical resources through application of the U.S. Secretary of the Interior's Standards and Guidelines for rehabilitation, reconstruction, and restoration.	Despite retaining and rehabilitating the historic garage and stucco privacy wall and entry, and the implementation of Mitigation Measures HR-1 through HR-3, the proposed demolition of HRB Site #1481 would be inconsistent with Policy HP-A.5e.	No

Table 5.1-2
LA JOLLA COMMUNITY PLAN AND LOCAL COASTAL PROGRAM LAND USE PLAN
GOALS AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
Natural Resources and Open Space System Element		
Goals: • Preserve the natural amenities of La Jolla such as its open space, hillsides, canyons, bluffs, parks, beaches, tidepools and coastal waters. • Maintain the identified public views to and from these amenities in order to achieve a beneficial relationship between the natural or unimproved and developed areas of the community. • Protect the environmentally sensitive resources of La Jolla's open areas including its coastal bluffs, sensitive steep hillside slopes, canyons, native plant life and wildlife habitat linkages.	Consistent with these goals, the project would demolish the existing residence situated 2.5 feet from the coastal bluff and relocate the new residence to 25 to 40 feet back from the coastal bluff. All existing structures along the bluff would be removed and no shoreline protection devices are proposed that would impede sand replenishment. A COE would be recorded over the coastal bluffs on site to protect them in perpetuity. There are no scenic vistas on site and the closest public vista is situated 0.15 miles south of the project in a location where the project would not be visible when viewed from the overlook area. View corridors would be established along the southern and northern property lines.	Yes
Policies – Visual Resources: a. Public views from identified vantage points, to and from La Jolla's community landmarks and scenic vistas of the ocean, beach and bluff areas, hillsides and canyons shall be retained and enhanced for public use (see Figure 9 and Appendix G). b. Public views to the ocean from the first public roadway adjacent to the ocean shall be preserved and enhanced, including visual access across private coastal properties at yards and setbacks. *Plan Recommendations – Visual Resources:* b. Screen satellite antennas, air conditioning duct work and other service equipment from identified public view corridors. c. Protect public views to and along the shoreline as well as to all designated open space areas and scenic resources from public vantage points as identified in Figure 9 and Appendix G (Coastal Access Subarea maps). Public views to the ocean along public streets are identified in Appendix G. Design and	The project site is located on a coastal bluff on Camino De La Costa, which is designated as an Intermittent or Partial Vista; however, views of the Pacific Ocean are obstructed through the site due to the existing historic garage and stucco privacy walls, and existing tree canopies/landscaping. The site is not visible from the designated public vantage point (identified as public vantage viewpoint 78, *Camino De La Costas includes Cortez Place, Costa Place*) in the Community Plan as its viewshed faces south and southwest and not in the direction of the project site (refer to Figure 5.1-1, *Visual Access*). The proposed structure and site plan would comply with the SDMC Section 113.0243 RS-1-5 residential zone development regulations related to side yard setbacks, building height, lot coverage, floor area ratio, and massing. The project would create new view corridors along the southern and northern property lines to enable views through the property to the Pacific Ocean from the street frontage. The scenic quality of the shoreline would be enhanced through the removal of existing stone/masonry walls and staircases situated on the coastal bluffs.	Yes

Table 5.1-2
LA JOLLA COMMUNITY PLAN AND LOCAL COASTAL PROGRAM LAND USE PLAN
GOALS AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
site proposed development that may affect an existing or potential public view to be protected, as identified in Figure 9 or in Appendix G, in such a manner as to preserve, enhance or restore the designated public view. d. Implement the regulation of the building envelope to preserve public views through the height, setback, landscaping, and fence transparency regulation of the Land Development Code that limit the building profile and maximize view opportunities. e. Where existing streets serve as public vantage points, as identified in Figure 9 and Appendix G including, but not limited to, view corridors and scenic overlooks and their associated viewsheds, set back and terrace development on corner lots and/or away from the street in order to preserve and enhance the public view provided from the public vantage point to and along the ocean. In review of variances or other requests for reduced setbacks within the viewshed public vantage points, adjacent to identified view corridors or on property between the ocean and first coastal roadway, do not allow any reduction in the public view provided to and along the ocean. Figure 9 and Appendix G list streets that provide identified public views to and along the ocean to be protected from visual obstruction. f. Avoid the placement of sea walls, fences and gunite on bluffs, where feasible, in order to preserve the natural and scenic quality of shoreline bluffs. Where the use of such improvements is unavoidable, design and site the improvements to incorporate surrounding land form characteristics in order to blend the new with the existing.	Recordation of a COE over the coastal bluffs on site would protect the bluffs in perpetuity.	

Table 5.1-2
LA JOLLA COMMUNITY PLAN AND LOCAL COASTAL PROGRAM LAND USE PLAN
GOALS AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
g. Plant and maintain landscaping or vegetation so that it does not obstruct public views of coastal resources from identified public vantage points as identified in Figure 9. h. Where new development is proposed on property that lies between the shoreline and the first public roadway, preserve, enhance, or restore existing or potential view corridors within the yards and setbacks by adhering to setback regulations that cumulatively, with the adjacent property, form functional view corridors and prevent an appearance of the public right-of-way being walled off from the ocean. j. As viewed from identified scenic overlooks, minimize the impact of bulk and scale, rooflines and landscaping on the viewshed over the property.		
Policies – Shoreline Areas and Coastal Bluffs: a. The City should preserve and protect the coastal bluffs, beaches and shoreline areas of La Jolla assuring that development occurs in a manner that protects these resources, encourages sensitive development, retains biodiversity and interconnected habitats and maximizes physical and visual public access to and along the shoreline. Coastal bluffs are formed by constant wave action eroding the base of the cliffs, and causing the shoreline to move landward. This coastline retreat is rapid in some areas, slower in others, and can be greatly accelerated by human activities. To protect the natural beauty of the coastline while allowing the natural shoreline retreat process to continue, the City and the state aggressively regulate coastal development to prevent activities such as misdirected drainage from increasing natural erosion. Only appropriate erosion control measures that maintain the natural environment, yet allow for the effective drainage of surface water shall be permitted. Surface water drainage shall	The proposed removal of existing shoreline improvements on the coastal bluffs of the site and the recordation of a COE with deed restrictions to preserve the on-site coastal bluffs in perpetuity would be consistent with this policy. No shoreline protection devices are required or proposed. Because of the presence of sensitive coastal bluffs on site, an SDP would be required by the City in accordance with the ESL regulations. The new residence would be set back farther from the coastal bluffs than the existing residential structure and basement at a distance of 25 feet, which was determined to be an adequate setback distance based on site-specific analyses and recommendations in the project's geotechnical report that considered wave action, coastal erosion slope stability and sea level rise throughout the economic lifespan of the structure (i.e., not less than 75 years) (Christian Wheeler Engineering 2023). An exception from the 40-foot setback is proposed. The project site is not identified as a lateral or vertical public access in the Community Plan (refer to Physical Access Subarea	Yes

Table 5.1-2
LA JOLLA COMMUNITY PLAN AND LOCAL COASTAL PROGRAM LAND USE PLAN
GOALS AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
not be allowed to drain over or near the bluff, but rather shall be directed towards the street or directed into subterranean drainage facilities with energy dissipating devices. Where street drainage systems erode bluffs, the drainage system should be redesigned to prevent bluff erosion. -In addition, development should be avoided in areas that will eventually be damaged or require extensive seawalls for protection. Public coastal access should be considered when evaluating redevelopment along the coast. The Environmentally Sensitive Lands development regulations for Sensitive Coastal Bluffs and Coastal Beaches govern development, coastal bluff repair, shoreline protective work and erosion control. These regulations assure that development occurs in a manner that protects these resources, encourages sensitive development, and maximizes physical and visual public access to and along the shoreline. c. Development on coastal bluffs should be set back sufficiently from the bluff edge to avoid the need for shoreline or bluff erosion control devices so as not to impact the geology and visual quality of the bluff and/or public access along the shoreline. d. Accessory structures located within the bluff edge setback should be removed or relocated if determined that they pose a threat to bluff stability. When feasible, accessory structures should be brought into conformance with current standards and regulations. e. On coastal bluff property, when redevelopment of an existing previously conforming structure includes the demolition or removal of 50 percent or more of the exterior walls, require the entire structure to be brought into conformance with all policies and standards of the Local Coastal Program, including, but not limited to, bluff edge setback. Additions that increase	Maps A, D and G of Appendix G) and no private or public stairways are proposed. Drought-tolerant landscape materials would be installed to prevent shoreline erosion and all runoff/drainage produced by the project would be collected, treated, and pumped to the stormwater infrastructure in the public road, thus, diverting runoff away from the coastal bluffs, as described in Section 5.4, *Hydrology*. The project would be consistent with applicable policies and standards of the LCP outlined in the La Jolla Community Plan and contained in this table.	

Table 5.1-2
LA JOLLA COMMUNITY PLAN AND LOCAL COASTAL PROGRAM LAND USE PLAN
GOALS AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
the size of the structure by 50 percent or more shall not be authorized unless the structure is brought into conformance with the policies and standards of the Local Coastal Program. The baseline for determining the percent change to the structure is the structure as it existed on March 17, 1990. Any changes to the structure that have occurred since March 17, 1990, shall be included when determining if the 50 percent threshold is met. This policy does not apply to development that is exempt from coastal development permit requirements pursuant to the Land Development Code. *Plan Recommendations – Shoreline Areas:* p. Where new development is proposed on property that lies between the shoreline and the first public roadway, ensure an offer of dedication as a public easement of a vertical accessway of not less than 10 feet in width and running the full depth of the property provided that the need for such accessway has been identified within this community plan or that no such accessway exists within a lateral distance of 500 feet of the project site as identified in Appendix G. Figure 6 and Appendix G identify the location of accessways and public easements. Physical Access Subarea Maps A, D and G of Appendix G identify areas that should be analyzed to address potential physical access. q. Where new development is proposed on property that lies between the shoreline and the first public roadway, offer for dedication as a public easement, lateral access along the shoreline. *Plan Recommendations – Coastal Bluffs:* a. Prohibit coastal bluff development, on or beyond the bluff face, except for public stairways and ramps to provide access from the bluff top to the beach or to maintain bluff stability.		

Table 5.1-2
LA JOLLA COMMUNITY PLAN AND LOCAL COASTAL PROGRAM LAND USE PLAN
GOALS AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
b. Set back new development on property containing a coastal bluff at least 40 feet from the bluff edge so as to not impact the geology and visual quality of the bluff. This setback may be reduced to not less than 25 feet if evidence is provided that indicates the site is stable enough to support the development at the proposed location without requiring construction of shoreline protective measures throughout the economic lifespan of the structure (not less than 75 years). Require applicants to accept a deed restriction to waive all rights to protective devices associated with new development on coastal bluffs. Do not allow a bluff edge setback less than 40 feet if erosion control measures or shoreline protective devices exist on the site which are necessary to protect the existing principal structure in danger from erosion. Require removal of obsolete or unnecessary protective devices, when feasible, and in a safe manner, or otherwise allow such devices to deteriorate naturally over time without any improvements allowed, to restore the natural integrity and visual quality of the coastal bluff over the long-term. When appropriate, development may include open fencing to deter trespassing and protect fragile resources, and erosion control measures. These measures, such as sea walls and drainage conduits, are subject to the Environmentally Sensitive Lands regulations which will ensure that such measures do not alter the natural character of the bluff face, restrict public access, or encroach on public property. Do not allow erosion control measures on a site where development was approved with less than a 40 foot bluff edge setback, unless otherwise permitted in the Sensitive Coastal Bluff Regulations in the Land Development Code. c. Require a geotechnical report for all bluff top development to document that the site is stable enough to support the		

Table 5.1-2
LA JOLLA COMMUNITY PLAN AND LOCAL COASTAL PROGRAM LAND USE PLAN
GOALS AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
proposed development in accordance with the Environmentally Sensitive Lands regulations. c. Require indigenous, native, non-invasive and drought tolerant plants in all new developments and significant additions along coastal bluffs, to reduce the need for underground irrigation systems that contribute to the erosion of the bluff face due to water runoff over the bluff. d. Direct roof and surface drainage away from the bluff towards the street or into special drainage facilities that have been equipped to divert water runoff from flowing over the bluff. Improve existing street drainage outlets with energy dissipating devices or other similar measures in order to minimize erosion caused by quantity, velocity, or content of runoff. j. Require removal or relocation of accessory structures located within the bluff edge setback if it is determined, in conjunction with proposed development on the site that such structures pose a threat to the bluff stability, or, such structures should be brought into conformance with current regulations. k. For structures located partially or entirely within the bluff edge setback, require all additions (at grade and at upper floors) to be landward of the bluff edge setback line. Additions that increase the size of the structure by 50 percent or more, including all authorized additions that were undertaken after March 17, 1990 (effective certification of the LCP), shall not be authorized unless such structures are brought into conformance with the policies and standards of the Local Coastal Program. l. For structures located partially or entirely within the bluff edge setback, do not authorize redevelopment, including demolition or removal of 50 percent or more of the exterior walls, including all demolition that was undertaken after		

Table 5.1-2
LA JOLLA COMMUNITY PLAN AND LOCAL COASTAL PROGRAM LAND USE PLAN
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Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
March 17, 1990, unless the entire structure is brought into conformance with the policies and standards of the Local Coastal Program.		
Transportation System Element		
e. Require that all proposed development maintain and enhance public access to the coast by providing adequate parking per the Coastal Parking regulations of the Land Development Code. This required parking includes higher parking ratios for multiple-dwelling units in the Beach Impact Areas, as well as the required prohibition of curb cuts where there is alley access, in order to retain and enhance publicly accessible street parking for beach visitors.	The project's parking would comply with the LDC regulations through the construction of a parking lift system inside the rehabilitated parking garage; no removal of existing street parking is proposed, and no effects on parking in the beach impact areas would occur.	Yes
Residential Land Use Element		
Goals: • Provide a high quality residential environment in La Jolla that respects its relationship to the sea, to hillsides and to open space. Maintain the character of La Jolla's residential areas by ensuring that redevelopment occurs in a manner that protects natural features, preserves existing streetscape themes, and allows a harmonious visual relationship to exist between the bulk and scale of new and older structures.	The new residential building is designed in a contemporary style of architecture and would implement the RS-1-5 development regulations with regard to setbacks, building heights, and lot coverage. The highly transparent structure would reflect the San Diego climate and afford views of the Pacific Ocean from inside the residence. The new building would be placed west of the historic garage and stucco privacy walls along Camino De La Costa and would largely maintain the visual appearance of the site directly abutting the road. Updated landscaping would be installed throughout the property, including along the streetscape, to enhance and compliment the architectural features and provide texture and visual interest.	Yes
Policies – Community Character: In order to promote development compatible with the existing residential scale:	The project design would combine the rehabilitation of historic elements along the streetscape with a new contemporary structure behind those elements to respect the existing character of the neighborhood, which features a combination of old and new buildings and a variety of architectural styles. The new residence's	Yes

Table 5.1-2
LA JOLLA COMMUNITY PLAN AND LOCAL COASTAL PROGRAM LAND USE PLAN
GOALS AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
a. The City should apply the development recommendations that are contained in this plan to all properties in La Jolla in order avoid extreme and intrusive changes to the residential scale of La Jolla's neighborhoods and to promote good design and harmony within the visual relationships and transitions between new and older structures. b. The City should ensure that new residential development within La Jolla complies with the landscape and streetscape guidelines that are identified in this element and in Appendix E of this plan. c. The City should ensure that residential development within La Jolla complies with the landscape and streetscape recommendations that are identified in this element as well as the policies and recommendations contained within the Visual Resources section of the Natural Resources and Open Space System Element of this plan. *Plan Recommendations – Community Character* a. In order to maintain and enhance the existing neighborhood character and ambiance, and to promote good design and visual harmony in the transitions between new and existing structures, preserve the following elements: 1) Bulk and scale – with regard to surrounding structures or land form conditions as viewed from the public right-of-way and from parks and open space; 2) Street landscape – with regard to size and shape or generalized type of planting materials; 3) Hardscapes – with regard to pavement types, patterns or lack of patterns, colors, widths, colors and contours; 4) Street fixtures – with regard to type, size and location (street light fixtures, benches, street signage);	architecture uses contemporary materials, transparent glass, off-setting planes, building articulation, and roofline treatments to create visual interest and maintain community character. Its bulk and scale would mirror that of the surrounding residences in the Lower Hermosa neighborhood. The project's landscape and streetscape would comply with the guidelines in Appendix E of the Community Plan. The project would comply with the visual resources policies of the Community Plan by complying with the SDMC Section 113.0243 RS-1-5 residential zone development regulations, creating enhanced public views from the local road through the creation of dedicated view corridors, and not causing view blockages from public vantage points or vistas. The project would compliment the character in the neighborhood in terms of its style, form, and features, consistent with this policy. The project would implement the RS-1-5 development regulations with regard to setbacks, building heights, and lot coverage while retaining previously conforming setbacks for the existing historic garage and stucco privacy wall and entry along Camino De La Costa. The project would remove the non-conforming residence and construct a new residence that would conform with the 30-foot height limit.	

Table 5.1-2
LA JOLLA COMMUNITY PLAN AND LOCAL COASTAL PROGRAM LAND USE PLAN
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Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
5) Site fixtures – with regard to height, type, material and location (fences, walls, retaining walls, curb cuts and driveways); 6) Curbs, gutters, and street pavements -with regard to types and materials; and 7) Public physical and visual access as identified in Figure 9 and Appendix b. In order to regulate the scale of new development, apply development regulations to all residential properties in La Jolla that proportionally relate the building envelope to the existing lot dimensions. Apply minimum side and rear yard setback requirements that separate structures from adjacent properties in order to prevent a wall effect along the street face as viewed from the public right-of-way. Side yard setbacks should be incrementally increased for wider lots. c. In order to promote transitions in scale between new and older structures, create visual relief through the use of diagonal or off-setting planes, building articulation, roofline treatment and variations within front yard setback requirements. a. For large lots in single dwelling unit areas, apply development regulations that will limit the perceived bulk and scale differences relative to surrounding lots. Apply a sliding scale for floor area ratios that will decrease building scale as the lot size increases. b. In order to address transitions between the bulk and scale of new and older development in residential areas, maintain the existing 30-foot height limit of the single dwelling unit zones and Proposition D. Structures with front and side yard facades that exceed one story should slope or step back additional stories, up to the 30-foot height limit, in order to allow		

Table 5.1-2
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Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
flexibility while maintaining the integrity of the streetscape and providing adequate amounts of light and air.		
Policies – Development Near Coastal Bluffs: a. The City should ensure that residential projects along the coastal bluff maintain yards and setbacks as established by the underlying zone and other applicable regulations in the Land Development Code in order to form view corridors and to prevent a walled-off appearance from the street to the ocean. b. The City should ensure that bluff stability is a foremost consideration in site design. New development on or near the coastal bluff will be designed in a manner that will protect the bluff from erosion. *Plan Recommendations – Development Near Coastal Bluffs:* a. Prohibit coastal bluff development on or beyond the bluff face, except for public stairways and ramps to provide access from the bluff top to the beach as identified in Appendix G or to maintain bluff stability. Other permitted coastal development would include fencing to deter trespassing and protect fragile resources, and erosion control measures, such as seawalls and drainage conduits, provided that such measures do not alter the natural character of the bluff face, restrict public access, or encroach on public property without an approved encroachment permit. b. Require a geotechnical report for all bluff top development to document that the site is stable enough to support the proposed development. f. Require indigenous, native and drought tolerant plants in all new developments and significant additions along coastal bluffs, to reduce the need for underground irrigation systems	The project would remove existing improvements on the coastal bluffs and record a COE with deed restrictions to preserve the on-site coastal bluffs in perpetuity. No shoreline protection devices are required or proposed. Because of the presence of sensitive coastal bluffs on site, an SDP would be required by the City in accordance with the ESL regulations. The new residence would be set back farther from the coastal bluffs than the existing residential structure at a distance of 25 feet, which was determined adequate based on site-specific analyses and recommendations in the project's geotechnical report that considered wave action, coastal erosion and slope stability throughout the economic lifespan of the structure (i.e., not less than 75 years) (Christian Wheeler 2023). An reduction from the 40-foot setback is proposed. The project site is not identified as a lateral or vertical public access in the Community Plan (refer to Physical Access Subarea Maps A, D and G of Appendix G) and no private or public stairways are proposed. Drought-tolerant landscape materials would be installed to prevent shoreline erosion; temporary irrigation would be used to establish the landscape materials. All runoff/drainage produced by the project would be collected, treated, and pumped to the stormwater infrastructure in the public road, thus diverting runoff away from the coastal bluffs, as described in Section 5.4, *Hydrology*. The project would be consistent with applicable policies and standards of the LCP contained in the La Jolla Community Plan as outlined in this consistency analysis. A CDP would be required to implement the project.	Yes

Table 5.1-2
LA JOLLA COMMUNITY PLAN AND LOCAL COASTAL PROGRAM LAND USE PLAN
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Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
that contribute to the erosion of the bluff face due to water runoff over the bluff. g. Direct roof and hardscape drainage away from the bluff toward the street. i. Prohibit excavation, grading, or deposit of any materials on the beach or the face of the bluff and prohibit the use of sandy beach for the interim storage of construction materials and equipment, except for permitted shoreline protective devices. As a condition of new development, require a waiver of liability against the public and any governmental agency for liability due to damage from storm waves to real property associated with the improvement which should be recorded as a deed restriction against the property.		
Policies – Geologically Unstable Areas: The City should require that all residential structures proposed in specific geologic hazard zones as identified on the geologic hazard maps referenced by the Seismic Safety Element of the City of San Diego Progress Guide and General Plan provide a geological reconnaissance report. All geological studies should be prepared in accordance with the City's Technical Guidelines for Geotechnical Reports manual which is located in the Development Services department. *Plan Recommendations – Geologically Unstable Areas:* Prepare all geological studies in accordance with the City's Development Services' *Technical Guidelines for Geotechnical Reports*, which require an evaluation of the site by state certified geologist and engineer to ensure the safety of development on the site.	The geotechnical investigation (Christian Wheeler 2023) that informed the project design and is referenced in Section 5.2, *Geologic Conditions*, and contained in Appendix B to this EIR was prepared in accordance with the City's General Plan and Technical Guidelines. According to the San Diego Seismic Safety Map No. 29, the northeastern portion of the site is located within Geologic Hazard Category 53, which is assigned to areas of level to sloping terrain with unfavorable geologic structure, where the potential risks are classified as "low to moderate." The central and western portions of the site are mapped in Hazards Category 43, which is used to identify coastal bluffs that are "generally unstable", with "unfavorable jointing" and "local high erosion." The southeast portion of the site is also mapped within Geologic Hazard Category 12, which is a buffer zone around faults that are considered inactive, presumed inactive, potentially active, or of unknown activity. Nonetheless, based on the site-specific analysis, the project geotechnical investigation (Christian Wheeler Engineering	Yes

Table 5.1-2
LA JOLLA COMMUNITY PLAN AND LOCAL COASTAL PROGRAM LAND USE PLAN
GOALS AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
	2022) and related studies do not identify any conditions that would preclude the proposed residence or other site improvements.	
Policies – Visual Resources and Public Access: a. All development and redevelopment projects should be subject to the policies and recommendations outlined under the Visual Resources, Coastal Bluffs, and Public and Shoreline Access Sections of the Natural Resources and Open Space System Element. *Plan Recommendations – Visual Resources and Public Access:* Residential projects proposed along identified public view areas, as listed in Figure 9 and Appendix G, are subject to the Visual Resources and Public Access policies and recommendations that are contained in the Natural Resource and Open Space System Element.	The project would be consistent with the Visual Resources, Coastal Bluffs, and Public and Shoreline Access Sections of the Natural Resources and Open Space System Element as described in this table. The site is not visible from the designated public vantage point (identified as public vantage viewpoint 78, *Camino De La Costas includes Cortez Place, Costa Place*) in the Community Plan as its viewshed faces south and southwest and not in the direction of the project site (refer to Figure 5.1-1, *Visual Access*).	Yes
Policies – Energy Efficiency The City should encourage and promote energy efficient building design/orientation as well as appliances and technology. *Plan Recommendations – Energy Efficiency* For all residential projects, consider the structures site design and solar orientation in order to maximize energy efficiency.	The project would implement green building techniques in accordance with the CBC and the project's CAP Consistency Checklist and comply with the City's goals concerning sustainability, including the installation of an on-site solar energy system.	Yes
Heritage Resources Element		
Goal: Preserve the heritage of La Jolla by identifying structures or natural features within the community that are important local landmarks or that hold community-wide significance and by designating them as historic sites. *Policies:*	The project would preserve and rehabilitate the historic garage and stucco privacy wall associated with the existing residence on the property. A Historical Resources Technical Report (HRTR) was prepared to evaluate the resource's significance and the City's HRB determined that the property should be listed locally on the San Diego Register of Historical Resources (SDRHR) and is eligible for listing on the California Register of Historic Resources (CRHR), as described in Section 5.3, *Historical Resources*. Despite retaining and	No

Table 5.1-2
LA JOLLA COMMUNITY PLAN AND LOCAL COASTAL PROGRAM LAND USE PLAN
GOALS AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
1. The City should protect sites of significant archaeological, architectural, and historical value within the residential and commercial areas of La Jolla for their scientific, education and heritage values. 2. The City, in cooperation with the Historical Resources Board and the community, should conduct a survey of historic and architecturally significant sites that are eligible for historic designation. This survey should be updated on a periodic basis per the Secretary of Interior Standards. 3. The City should encourage the adaptive reuse of historic structures to encourage their retention in order to preserve the structural integrity, usefulness and potential historic value of these buildings. Relocation of a historic structure to another site within the community should be utilized only after all other means to retain the structure on the original site have been exhausted, and the action has been deemed to meet the Secretary of Interior Standards criteria. 4. The City should ensure that sensitive paleontological resources in La Jolla are preserved through the recovery of significant fossils identified during the environmental review process. This work should be performed in accordance with the Secretary of Interior's Standards and Historical Resources Board policies and procedures. *Plan Recommendations:* 1. Preserve all designated historic sites in La Jolla. Maintain the existing cultural zone designation within the La Jolla Planned District in order to retain those structures and sites of designated architectural and historic value. 2. Pursue local historic designation of significant historic resources as recommended in Figure 21, through preliminary historic surveys. The surveys identify those sites that should	rehabilitating the historic garage and stucco privacy wall and entry, and the implementation of Mitigation Measures HR-1 through HR-3, the proposed demolition of HRB Site #1481 would be inconsistent with Community Plan policies directed at preserving the heritage of local landmarks. The project is not consistent with this goal and the policies of the Heritage Resources Element.	

Table 5.1-2
LA JOLLA COMMUNITY PLAN AND LOCAL COASTAL PROGRAM LAND USE PLAN
GOALS AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
be saved in their present location, those that should be saved but moved to another location; and those that could simply be photographed and documented prior to demolition. 3. In addition to the "Mills Act" property tax reduction for historically designated properties, provide additional incentives to encourage designation of significant historic properties such as other historic tax credits, façade easements and permit fee waivers in order to stimulate private conservation of these sites. 4. Evaluate potentially significant cultural or paleontological sites as part of a discretionary and/or Environmental review process. Project review should address the nature of the resource and compatibility of the project design with the resource, avoiding disturbance of the significant sites.		

Source: La Jolla Community Plan and Local Coastal Program Land Use Plan

Figure 5.1-1

Visual Access

CASA DE LOS AMIGOS

5.2 Geologic Conditions

This section of the EIR is based on a project-specific Preliminary Geotechnical Investigation, including an accompanying coastal bluff stability analysis and wave run-up study, contained in **Appendix B** (Christian Wheeler Engineering 2022). The geotechnical investigation consisted of surface reconnaissance, subsurface exploration obtaining representative soil samples, laboratory testing, analysis of the field and laboratory data, and review of relevant geologic literature. The results of those investigations are presented in this section.

5.2.1 Existing Conditions

5.2.1.1 Site Topography

The project site is a developed residential lot, that currently supports a two-story, single-family residence with an attached garage, site retaining walls, and other associated improvements. Elevations across the site range from about 1 foot at the southwest corner of the property along the base of the coastal bluff to about 38 feet along the northeast perimeter of the site.

Topographically, the central and northeastern portions of the site are characterized by a relatively level pad that supports the existing improvements and descends gently to the southwest. An unprotected coastal bluff characterizes the southwest portion of the lot. Vegetation on-site consists of typical residential landscaping including lawns, shrubs, and trees. Several small, cobble and mortar as well as masonry retaining walls exist within the rear of the property. As is evident on the referenced aerial photographs from the State's California Coastal Records Project, an erosion resistant headland characterizes the coastline along the southwest side of the site. The headland extends significantly further seaward at the project site than on the neighboring residential lots (Christian Wheeler Engineering 2022).

5.2.1.2 Structural Integrity

Based on observations made by a geotechnical engineer (EDCI Engineers 2023), the structural integrity of the existing residence shows significant deterioration, including evidence of cracking of concrete walls which appears to indicate some settlement/building movement and grade beams and columns show significant damage. The grade beam and column foundation structure is showing signs of substantial corrosion and deterioration in a large percentage of structural elements. Some beams are in advanced stages of flexural failure and appear to be deflecting to and resting upon soil. Other beams are exhibiting shear cracks and are in various stages of failure. Multiple columns have substantial spalling (i.e., breaking off in fragments or into smaller pieces) and corrosion in reinforcing and could begin to fail in compression as spalling continues or in shear in a seismic event.

5.2.1.3 Geologic Units

The subject site is located within the Coastal Physiographic Province of San Diego County. Based on subsurface explorations and analysis of geologic literature, the site is underlain by artificial fill soils, Quaternary-age old paralic deposits, and Cretaceous-age sedimentary deposits of the Point Loma

Formation (**Figure 5.2-1**, *Geologic Map*). A description of the underlying geologic materials is provided below:

- **Artificial Fill (Qaf).** Artificial fill materials underlie the developed portions of the property and mantle the upper portions of the coastal bluff face. Based on subsurface explorations, the artificial fill typically consists of light brown to dark brown, damp to moist, silty sand with lesser amounts of clayey sand. The artificial fill was found to be generally loose in all the subsurface explorations. In general, the fill soils ranged in thickness from about 5 feet within the eastern portion of the lot to about 8½ feet along the southwest side of the existing residence. Deeper fill soils may exist in areas of the site not investigated. From the west side of the existing structure, the artificial fill thins towards the central portion of the coastal bluff face. The fill soils were judged to possess a low expansion potential.
- **Old Paralic Deposits (Qop).** Quaternary-age old paralic deposits were encountered underlying the central and eastern portions of the site. The old paralic deposits make up the upper portions of the coastal bluff but are not present within the central and lower portions of the coastal bluff. Where encountered, the old paralic deposits were noted to consist of light brown, reddish-brown, and dark brown silty sands with lesser amounts of poorly graded sands and slightly silty sands. The old paralic deposits were noted to be generally moist and medium dense to dense in consistency. Within the central and eastern portions of the site the old paralic deposits were noted to extend to depths of about 8 feet to 13 feet from existing site grades. The old paralic deposits were judged to possess a low expansion potential.
- **Point Loma Formation (Kp).** As observed along the coastal bluff, and noted in the subsurface explorations, Cretaceous-age sedimentary deposits of the Point Loma Formation underlie the artificial fill and old paralic deposit within the central and eastern portions of the site and crop out along the central and lower bluff face. The materials of the Point Loma Formation were noted to generally consist of light brown to yellowish brown, silty sands with lesser amounts of slightly silty sands. These materials were noted to be moist and dense to very dense, in consistency. Although not noted in the borings, relatively thin lenses of yellowish-brown, hard, silty clay are commonly found within the Point Loma Formation in the general area of the project site. The encountered materials of the Point Loma Formation underlying the site were judged to possess a low expansion potential.

5.2.1.4 Geologic Structure

The available exposures of the formational materials that crop out along the coastal bluff southwest of the site indicate that the Point Loma Formation dips to the northeast (into the bluff) and northwest at inclinations ranging from approximately 5 to 10 degrees in the vicinity of the project site. Such bedding orientations are considered to be neutral to favorable with regards to the gross stability of the coastal bluff. Several fractures and small, presumably inactive, faults were also observed in the formational outcrops along the coastal bluff southeast of the project site. These fractures were noted to typically be very steep (often near-vertical) and strike predominantly in generally a northeasterly direction. The small faults exposed within the Cretaceous-age sedimentary deposits along the beach area to the southeast of the site generally dip steeply and do not bisect the overlying old paralic deposits. The shoreward projections of these small, presumably inactive faults do not trend directly towards the subject site. **Figure 5.2-2**, *Geologic Cross-Sections*, illustrates the

subsurface structure of the on-site geologic formations.

5.2.1.5 Regional Seismicity

Much of southern California, including the San Diego County area, is characterized by a series of Quaternary-age fault zones that consist of several individual, en echelon faults that generally strike in a northerly to northwesterly direction, as noted above under *Geologic Structure*. The project site, like much of southern California, is within a broad, seismically active region that is potentially subject to substantial hazards associated with moderate to large earthquake events. Large magnitude earthquakes have occurred to the east of the project area along major active faults associated with the San Andreas Fault System, including portions of the San Andreas, San Jacinto, and Elsinore fault zones. Collectively, these fault zones form the boundary between the Pacific and North American tectonic plates. Frequent moderate, and occasional large, earthquakes occur in this zone of major northwest trending strike-slip faults. Historically, the San Diego coastal region, including the project site and vicinity, has had far fewer earthquakes than most other portions of southern California.

Onshore and in the near-field to the site, only the Rose Canyon Fault Zone is considered active. The Rose Canyon Fault Zone projects onshore near La Jolla, and trends south and southeast through San Diego Bay before continuing offshore. Other active fault zones in the region that could affect the project site include the Coronado Bank, San Diego Trough, and San Clemente Fault Zones to the southwest; the Newport-Inglewood and Palos Verdes Fault Zones to the northwest, and the Elsinore, Earthquake Valley, San Jacinto, and San Andreas Fault Zones to the northeast. Additionally, several small, northeast- and northwest-trending, presumably inactive faults are present in the immediate vicinity of the site. As described above under *Geologic Structure*, the shoreward projections of these small, presumably inactive faults, do not trend directly towards the subject site (Christian Wheeler Engineering 2022). The Rose Canyon Fault Zone is located approximately 2.25 miles northeast of the project site at its closest point. Because it includes the closest known active faults, the Rose Canyon Fault Zone is expected to have the greatest potential effect on the project site relative to earthquake ground motions. **Figure 5.2-3**, *Regional Fault Map*, shows the major faults mapped in the project region.

5.2.1.6 Bluff Edge

The preliminary geotechnical investigation indicates that the edge of the natural bluff at the site is at an approximate elevation of 25 feet to 27 feet, beneath a layer of artificial fill soils that were previously placed above the bluff edge during the original site development approximately 100 years ago. Delineation of the bluff edge at the subject site considered the geologic observations from the exploratory borings and hand auger explorations performed on-site, as well as review of historic aerial photographs and topographic maps, in accordance with the methodology presented in the City's *Coastal Bluffs and Beaches Guidelines* (City of San Diego 2000). The bluff edge is shown on the project site plan (Figure 3-1), geology map (Figure 5.2-1), and geologic cross sections (Figure 5.2-2).

Coastal bluff recession is a process that is presently occurring in much of coastal San Diego County. Typically, coastal recession occurs through three modes that include: 1) undercutting of the base of the cliff by wave action and subsequent block falls of the overlying materials; 2) undercutting of the terrace deposits or other surficial material, initiated by water seepage conditions at the formational

contact, and subsequent slumping of the overlying materials; and 3) deep-seated rotational-type failures. Historically, the mode of recession of the coastal bluff in the vicinity of the subject site appears to be manifested both as small to moderate block falls caused by erosion along the fractures and joints in the Point Loma Formation, and by subaerial erosion of surficial materials caused by severe storm conditions, drainage conditions, or the activities of man. The rate of erosion along the coastal bluff in the vicinity of the project site has typically been variable with periods of very little recession alternating with episodes in which the lower bluff areas are rapidly eroded. Rapid erosion periods are typically associated with periods of high storm activities, and when substantial surficial erosion occurs as the result of increased natural and channeled drainage.

With regard to the project site, an erosion resistant headland characterizes the coastline along the southwest side of the site. The headland extends significantly further seaward at the property than on the neighboring, residential lots. The 1994 Shoreline Erosion Assessment and Atlas of the San Diego Region prepared by the California Department of Boating and Waterways and San Diego Association of Governments (SANDAG) indicates that the relative shoreline erosion risk in the area is "moderate" with an "inadequate setback." Based on a review of available topographic maps and aerial photographs, the edge of the on-site bluff edge has remained constant since the site was first developed in the early 1920s and the upper portions of the bluff were covered by artificial fill. However, the lower bluff in the project area may have experienced some erosion since site development due to documented migration in the La Jolla area (i.e., less than 0.5 inch per year) (Christian Wheeler Engineering 2022).

5.2.1.7 Geologic Hazards

According to the San Diego Seismic Safety Map No. 29, the northeastern portion of the site is located within Geologic Hazard Category 53. Hazard Category 53 is assigned to areas of level to sloping terrain with unfavorable geologic structure, where the potential risks are classified as "low to moderate." The central and western portions of the site are mapped in Hazards Category 43, which is used to identify coastal bluffs that are "generally unstable", with "unfavorable jointing" and "local high erosion." The southeast portion of the site is also mapped within Geologic Hazard Category 12, which is a buffer zone around faults that are considered inactive, presumed inactive, potentially active, or of unknown activity.

However, according to the Preliminary Geotechnical Investigation (Appendix B), no significant geologic hazards are present on the project site, as noted below:

- No active faults are present at the subject site proper so the site is not considered susceptible to surface rupture;
- The materials at the site are relatively competent and are not anticipated to be subject to liquefaction due to such factors as soil density, grain-size distribution, and absence of shallow ground water;
- The majority of the surficial soils at the site are anticipated to possess a low to moderate expansive potential;
- The developed area of the site is located outside of the boundaries of both the 100-year and 500-year flood zones;

- The portions of the site to be redeveloped are outside of the projected tsunami inundation line and tsunami inundation area (CalEMA 2009) and, although the Multi-Jurisdictional Hazard Mitigation Plan of the County of San Diego (URS 2004) maps the area of the subject site as being within an area susceptible to the maximum projected run-up from a tsunami, the tsunami hazard at the site is relatively low and no greater than it is at other, proximal bluff edge sites throughout the Bird Rock and Windansea areas of La Jolla;
- No appreciable bluff edge retreat has occurred at the site during other well documented El Niño events; and
- The site is not considered susceptible to a seiche hazard.

5.2.2 Regulatory Framework

5.2.2.1 State Regulations

California Seismic Hazards Mapping Act

The California Seismic Hazards Mapping Act (Public Resource Code Division 2, Chapter 7.8, Section 2690 et seq.) provides a statewide seismic hazard mapping and technical advisory program to assist local governments in protecting public health and safety relative to seismic hazards. The Seismic Hazards Mapping Act provides direction and funding for the State Geologist to compile seismic hazard maps (to designate zones of potential liquefaction and seismically induced landslide potential) and to make those maps available to local governments. The Seismic Hazards Mapping Act, along with related standards in the Seismic Hazards Mapping Regulations (CCR Title 14, Division 2, Chapter 8, Article 10, Section 3270 et seq.), also directs local governments to require the completion and review of appropriate geotechnical studies prior to approving development projects. These requirements are implemented on a local level through means such as General Plan directives and regulatory ordinances (with applicable City standards). The City of San Diego, including the USGS quadrangle that includes the project site, has not yet been mapped pursuant to the Seismic Hazard Mapping Act. As a result, the provisions of the Seismic Hazards Mapping Act would not apply to the project.

California Alquist-Priolo Earthquake Fault Zoning Act

The California Alquist-Priolo Act (Public Resources Code Section 2621 et seq.) is intended to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The law requires the State Geologist to establish regulatory zones known as Earthquake Fault Zones (previously called Special Studies Zones and Fault-Rupture Hazard Zones) around the surface traces of active faults, and to distribute maps of these zones to all affected cities, counties, and State agencies. The California Alquist-Priolo Act also requires completion of a geologic investigation prior to project approval, to demonstrate that applicable structures will not be constructed across active faults and/or that appropriate setbacks from such faults (generally 50 feet) are included in the project design.

California Building Code

The California Building Code (CBC) (California Code of Regulation [CCR] Title 24, Part 2) encompasses a number of requirements related to geologic issues. Specifically, these include general provisions; structural design, including soil and seismic loading; structural tests, and special inspections, including seismic resistance; soils and foundations; concrete; masonry; wood, including consideration of seismic design categories; construction safeguards; and grading, including excavation, fill, drainage, and erosion control criteria. The CBC encompasses standards from other applicable sources, including the International Building Code and ASTM International, with appropriate amendments and modifications to reflect site-specific conditions and requirements in California. Health and Safety Code (State law) Section 18902 gives CCR Title 24 the name California Building Standards Code (CBSC). The CBSC in CCR Title 24 is published by the California Building Standards Commission and it applies to all building occupancies (see Health and Safety Code Sections 18908 and 18938) throughout the State of California. Cities and counties are required by state law to enforce CCR Title 24 (reference Health and Safety Code Sections 17958, 17960, 18938(b), and 18948). Cities and counties may adopt ordinances making more restrictive requirements than provided by CCR Title 24, because of local climatic, geological, or topographical conditions. Such adoptions and a finding of need statement must be filed with the California Building Standards Commission (Reference Health and Safety Code Sections 17958.7 and 18941.5).

5.2.2.2 Local Regulations

Many of the applicable local regulations are listed in Land Use Section 5.1.1.3, *Applicable Plans and Policies*. However, the following regulatory framework pertains specifically to geologic stability and development near coastal bluff edges.

Seismic Safety Study

The City Seismic Safety Study includes a series of maps identifying potential geologic hazards throughout the City. These maps provide a guide to determine relative risks and identify areas prone to hazards including active fault zones, liquefaction, and landslides/slope stability that require appropriate levels of geotechnical investigation prior to discretionary approvals. Specific requirements related to the nature and level of required geotechnical investigations are outlined in San Diego Municipal Code (SDMC) Article 5, Division 18, Section 145.1803; and Information Bulletin 515. The project site is located within three geologic hazard zones 53, 43 and 12 as depicted on City Seismic Safety Study Geologic Hazard Map No. 29 as discussed above under *Geologic Hazards*.

General Plan

The Public Facilities, Services, and Safety Element of the City General Plan identifies a number of applicable policies related to seismic, geologic, and structural considerations, as discussed in Section 5.1, *Land Use*, of this EIR.

Land Development Code Regulations

Environmentally Sensitive Lands Regulations

As stated in Section 5.1, *Land Use*, of this EIR, the Environmentally Sensitive Lands (ESL) Regulations are applicable to the project because of the presence of on-site coastal bluffs (LDC Chapter 14, Article 1, Division 1; City of San Diego 2000). Coastal bluffs are defined as an escarpment or steep face of rock, decomposed rock, or soil resulting from erosion, faulting, or folding of the land mass that has a vertical relief of 10 feet or more and is located in the coastal zone. Sensitive coastal bluffs are a form of coastal bluffs that are generally located along the shoreline and adjacent to coastal beaches. Sensitive coastal bluffs include the bluff face and the area of the top of bluff located within 100 feet of the bluff edge (City of San Diego 2004).

According to SDMC Section 143.0143(f), *Development Regulations for Sensitive Coastal Bluffs*, all development including buildings, accessory structures, and any additions to existing structures shall be set back at least 40 feet from the coastal bluff edge, except as follows:

(1) The City Manager may permit structures to be located between 25 and 40 feet from the bluff edge where the evidence contained in a geology report indicates that the site is stable enough to support the development at the proposed distance from the coastal bluff edge and the project can be designed so that it will not be subject to or contribute to significant geologic instability throughout the anticipated life span of the primary structures, and no shoreline protection is required.

Reductions from the 40-foot setback shall be approved only if the geology report concludes the structure will not be subject to significant geologic instability, and not require construction of shoreline protection measures throughout the economic life span of the structure. In addition, the applicants shall accept a deed restriction to waive all rights to protective devices associated with the subject property. The geology report shall contain:

(A) An analysis of bluff retreat and coastal stability for the project site, according to accepted professional standards;

(B) An analysis of the potential effects on bluff stability of rising sea levels, using latest scientific information;

(C) An analysis of the potential effects of past and projected El Niño events on bluff stability;

(D) An analysis of whether this section of coastline is under a process of retreat.

The *Coastal Bluffs and Beaches Guidelines* (City of San Diego 2004) are intended to assist in the interpretation and implementation of the development regulations for sensitive coastal bluffs and coastal beaches contained in Chapter 14, Article 3, Division 1, ESL Regulations. Every development proposed on a sensitive coastal bluff (within 100 feet of the bluff edge) or on a site containing a coastal beach (where the development will be within 100 feet of the beach) is subject to the ESL Regulations and is evaluated for conformance with the guidelines as part of the review process for the required Site Development Permit (SDP). A Coastal Development Permit (CDP) is required in addition to the SDP for all coastal development proposed within the Coastal Overlay Zone, as discussed further in Section 5.1, *Land Use*, of this EIR. The property is currently non-conforming in that it has a wall and a private access path on the bluff face.

Grading Regulations

SDMC Section 142.0101 et seq. (Grading Regulations) addresses slope stability, protection of property, erosion control, water quality, landform preservation, and paleontological resources preservation, and protection of the public health, safety, and welfare of persons, property, and the environment. Requirements related to geologic conditions include implementation of temporary and permanent erosion measures as outlined in Chapter 14, Article 2, Division 2 Storm Water Runoff Control and Drainage Regulations of the SDMC.

5.2.3 Impact: Geologic Hazards

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

5.2.3.1 Impact Thresholds

Based on the City of San Diego's Significance Determination Thresholds (2022), geologic conditions impacts may be significant if the project would:

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

5.2.3.2 Impact Analysis

Geologic Hazards

Based on a review of published geologic maps and reports, the project site is not located on any known active, potentially active, or inactive fault traces. The site is not within a State of California Alquist-Priolo Earthquake Fault Zone. The nearest active fault zone is the Rose Canyon Fault Zone, located approximately 2.25 miles northeast of the site. Other active fault zones in the region that could possibly affect the site include the Coronado Bank, San Diego Trough, and San Clemente Fault Zones to the southwest; the Newport-Inglewood and Palos Verdes Fault Zones to the northwest, and the Elsinore, Earthquake Valley, San Jacinto, and San Andreas Fault Zones to the northeast. Additionally, several small, northeast- and northwest-trending, presumably inactive faults are present in the vicinity of the site. However, published geologic maps do not show any faults crossing through or nearby the site.

Based on the City's Seismic Safety Study, the project site likely has unfavorable geologic structure; however, the Preliminary Geotechnical Investigation relies on site-specific data and concludes that bedding orientations are considered to be neutral to favorable with regards to the gross stability and that no geotechnical conditions exist on the property that would preclude construction of the proposed residence and associated improvements, provided that the recommendations in the investigation are followed and the project's design complies with the CBC and City requirements.

In the event of a major earthquake on regional faults or other significant faults in the Southern California and northern Baja California area, the project site could be subjected to moderate to severe ground shaking. With respect to this hazard, the site is considered low risk and comparable to other locations in the general vicinity. Additionally, seismic design of the proposed structure

would be performed in accordance with guidelines currently adopted by the City, including CBC and seismic design parameters of the Structural Engineers Association of California. Implementation of proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, would ensure that the potential for impacts would be reduced to an acceptable level of risk. In addition, approval of a final geotechnical investigation by the City would be required prior to site development. Therefore, geologic hazards impacts would be less than significant.

Landslides

No landslides or indications of deep-seated land sliding were observed at the site during field exploration, during review of available geologic literature, or during the field reconnaissance conducted for the project. Specifically, the central and eastern portions of the site are considered to be "marginally susceptible" to slope failures; the southwest portion of the site, including the area of the coastal bluff face, is considered to be "most susceptible" to slope failures and located generally outside of the limits of known landslides but contain "over steepened high coastal bluffs which are subject to active sea-wave erosion."

A bluff stability analysis was conducted as part of the Preliminary Geotechnical Investigation (Appendix B). Given the neutral to favorable bedding orientation of the materials of Point Loma Formation and the results of the static bluff stability analysis, the existing coastal bluff at the site is generally considered stable and less than significant landslide impacts would arise, as discussed further under Impact 3, *Unstable Conditions*.

Tsunami/Seiches

Tsunamis are great sea waves produced by a submarine earthquake or volcanic eruption. Seiches are periodic oscillations in large bodies of water such as lakes, harbors, bays, or reservoirs. The risk potential for damage to the proposed residence caused by seiches is low and the risk to people or structures associated with inundation hazards caused by seiche is low. The site is adjacent to the Pacific Ocean, which would allow for both near field (Channel Island faults) and far field (Alaska and Japan faults) generated tsunamis to approach the site. The State of California (California Office of Emergency Services 2009) shows that the project site is just within the limit of a tsunami inundation zone; however, the limit of the tsunami zone would not reach the location of the proposed residence (Geo Soils Inc 2023). Even taking into consideration rising sea levels and future El Niño events, the Preliminary Geotechnical Investigation concludes that the bluff recession and bluff stability analyses demonstrate that tsunami hazards would result in less than significant impacts on bluff erosion and stability over the design life of the project.

5.2.3.3 Significance of Impact

The project would incorporate design recommendations from the site-specific geologic investigation to avoid impacts from geologic hazards. There is no potential for impacts from landslides based on the characteristics of the underlying formational materials. The on-site bluff conditions are stable and would not be susceptible to erosion and instability due to tsunamis. Less than significant geologic hazards impacts would occur.

5.2.3.4 Mitigation Monitoring and Reporting

No mitigation measures are required.

5.2.4 Impact: Soil Erosion

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

5.2.4.1 Impact Thresholds

Based on the City of San Diego's Significance Determination Thresholds (2022), geologic conditions impacts may be significant if the project would:

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

5.2.4.2 Impact Analysis

Erosion is the process by which the upper layers of the surface (such as soils) are worn and removed by the movement of water or wind. Because water is able to flow faster down steeper gradients, the steeper the slope on which a given soil is located, the more readily it will erode. Wind erosion can damage land and natural vegetation by removing soil from one place and depositing it in another. It mostly affects dry, sandy soils in flat, bare areas, but wind erosion may occur wherever soil is loose, dry, and finely granulated.

Implementation of the project would increase the potential for soil erosion and the off-site transport of eroded material (sedimentation), through activities such as the removal of vegetation, demolition of the existing structure and site improvements, and grading/excavation of the project site. Erosion and sedimentation can increase sediment volumes in surface water runoff, potentially resulting in water quality impacts to downstream receiving waters such as increased turbidity and the transport of contaminants that tend to adhere to sediment particles (with related effects to aquatic habitats and species).

As discussed further in Section 5.4, *Hydrology*, and Section 5.5, *Water Quality*, the project would be required to comply with the Storm Water Standards in response to the NPDES permits. Additionally, the project would be required to implement a Water Pollution Control Plan (WPCP), which would require implementation of appropriate Best Management Practices (BMPs) for erosion control and sediment control among other water quality control requirements. Specifically, the proposed storm water BMPs include a combination of sedimentation basins, inlet filters, erosion control mats, mulching, straw/hay bales, berms, silt fences, dikes, biofilter/compost bags, vegetated buffer strips, hydroseeding with native plants, preventative maintenance (e.g., sediment basin inspection and repair), and good housekeeping practices (e.g., removal of sediment, particulates and trash from paved areas before it enters the drainage system). The project would be required to implement the BMPs pursuant to the City Storm Water Standards and Grading Ordinance. Given the required compliance with the application erosion control regulations and implementation of BMPs, no significant impacts related to erosion and sedimentation are anticipated from implementation of the proposed residence.

5.2.4.3 Significance of Impact

Significant potential erosion and sedimentation impacts could occur in association with project-related grading, excavation, and vegetation disturbance. These potential impacts would be avoided or reduced to below a level of significance by required adherence to erosion control standards pursuant to applicable NPDES and related City regulations. Specifically, regulatory conformance would be achieved/maintained through measures including the use of appropriate BMPs to be implemented as part of the City/NPDES storm water standards.

5.2.4.4 Mitigation Monitoring and Reporting

No mitigation measures are required.

5.2.5 Impact: Unstable Conditions

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

5.2.5.1 Impact Thresholds

Based on the City of San Diego's Significance Determination Thresholds (2022), geologic conditions impacts may be significant if the project would:

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

5.2.5.2 Impact Analysis

The project geotechnical investigation (Christian Wheeler Engineering 2022) and related studies do not identify any conditions that would preclude the proposed residence or other site improvements. The main geotechnical conditions affecting the subject project are the presence of potentially compressible fill soils and native soils underlying the area of the proposed construction. A number of recommendations are provided in the investigation that address the removal of on-site fill soils and old paralic deposits and replacement with compacted fill soils that would be approved by a geotechnical engineer prior to issuance of any construction permits as required by the project's permit conditions on geology. The drainage around the proposed residence would be designed to collect and direct surface water away from the top of slopes toward drainage facilities, as discussed in Section 5.4, *Hydrology*. In addition, approval of a final geotechnical investigation by the City would be required prior to site development.

Based on these considerations and the above-noted requirements and recommendations, the following analysis evaluates potential impacts of the project relative to landslides/bluff stability and unstable soil conditions.

Landslides/Bluff Stability

The Preliminary Geotechnical Investigation determined that the site is underlain at shallow depths by medium dense to dense, old paralic deposits above very dense, well-consolidated, sandstones of the Point Loma Formation. Based on the results of the quantitative bluff stability analyses conducted for the project and the fact that the conservative estimation of future erosion of the edge of bluff to the west of the site would be less than the City's minimum allowable setback (i.e., 40-foot bluff top setback), the existing coastal bluff at the site is generally considered to be stable.

A coastal hazard and wave runup analysis was completed to assess the project site's potential for bluff erosion. The average retreat rate on site is 0.03 feet per year resulting in less than 3 feet of bluff retreat over the lifespan of the development. To address the effects of future sea level rise (SLR) on bluff retreat rates, the SLR policy guidance from the California Coastal Commission (CCC 2018) was consulted and the National Oceanographic and Atmospheric Administration (NOAA) latest SLR science (NOAA 2022) was reviewed. The future SLR erosion rate could increase to 0.6 feet per year resulting in up to 6 feet of bluff retreat over the lifespan of the development (Geo Soils Inc. 2023). Therefore, the Preliminary Geotechnical Investigation indicates that a 25-foot bluff top setback would be appropriate given that the site is stable enough to support the development and the project can be designed so that it would neither be subject to nor contribute to significant geologic instability throughout the anticipated life span (i.e., 75 years) of the proposed residence and other site improvements (Christian Wheeler Engineering 2022). The incorporation of bluff stability design recommendations from the site-specific Preliminary Geotechnical Investigation into the project design and approval of a final geotechnical investigation by the City as required prior to site development would address the potential impacts related to bluff stability and erosion.

Unstable Soils

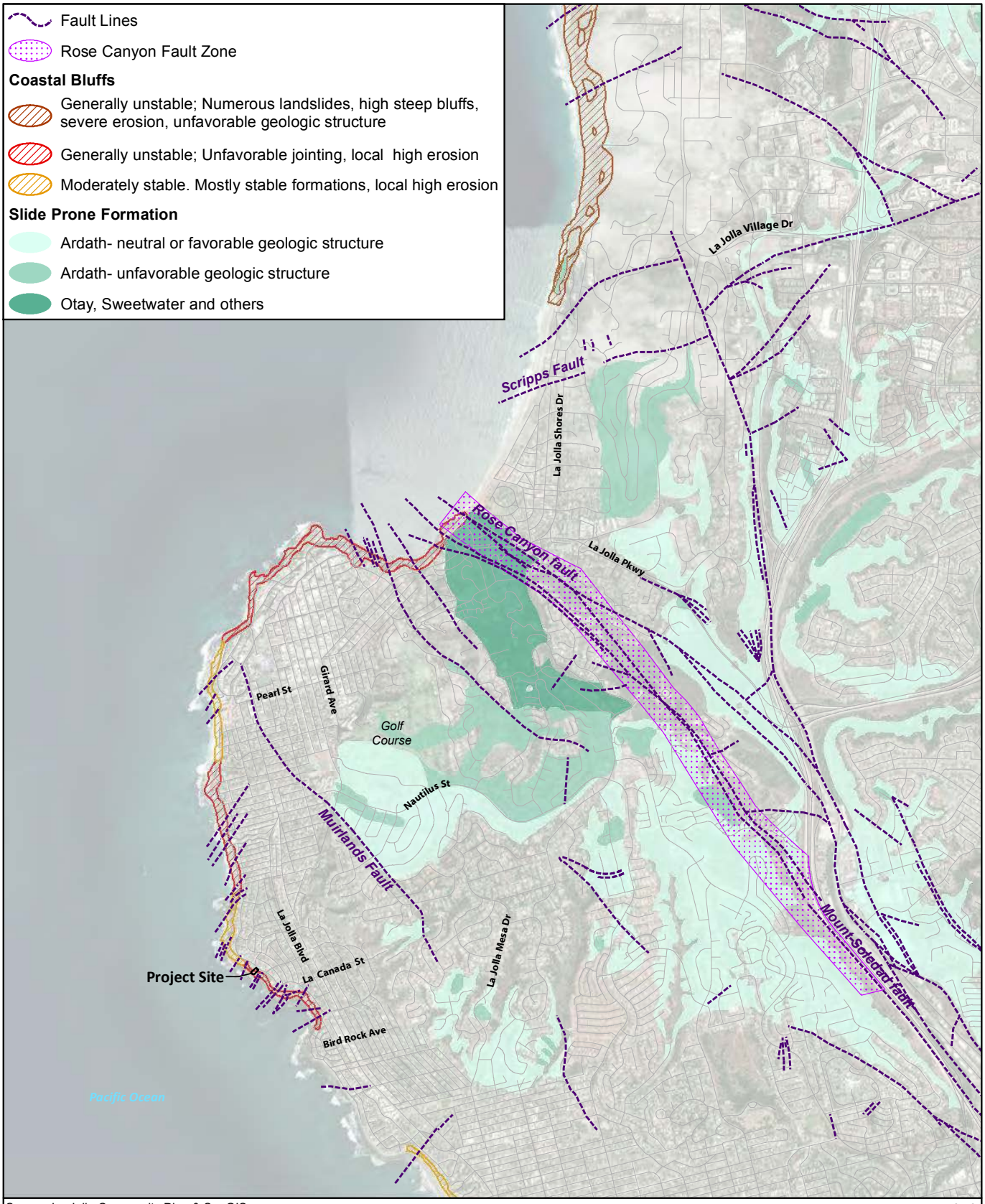
There are no unstable soil conditions on site that would impact the project. The soil materials at the site are relatively competent and are not anticipated to be subject to liquefaction due to such factors as soil density, grain-size distribution, and absence of shallow ground water. The majority of the surficial soils at the site possess a low to moderate expansive potential. The existing potentially compressible fill materials and uppermost portions of the old paralic deposits are considered unsuitable for the support of settlement sensitive improvements. These unsuitable materials extend to a maximum estimated combined depth of about 9 feet below existing grade. The incorporation of soil-specific recommendations from the site-specific Preliminary Geotechnical Investigation into the project design and approval of a final geotechnical investigation by the City as required prior to site development would address the potential impacts related to bluff stability and erosion. Therefore, the risk associated with compressible/expansive soils would be avoided.

5.2.5.3 Significance of Impact

Implementation of proper (and required) engineering design and industry standard construction practices, as part of (and in conformance to) applicable regulatory requirements, would ensure that the potential for geologic instability impacts from the project would be less than significant.

5.2.5.4 Mitigation Monitoring and Reporting

No mitigation measures are required.

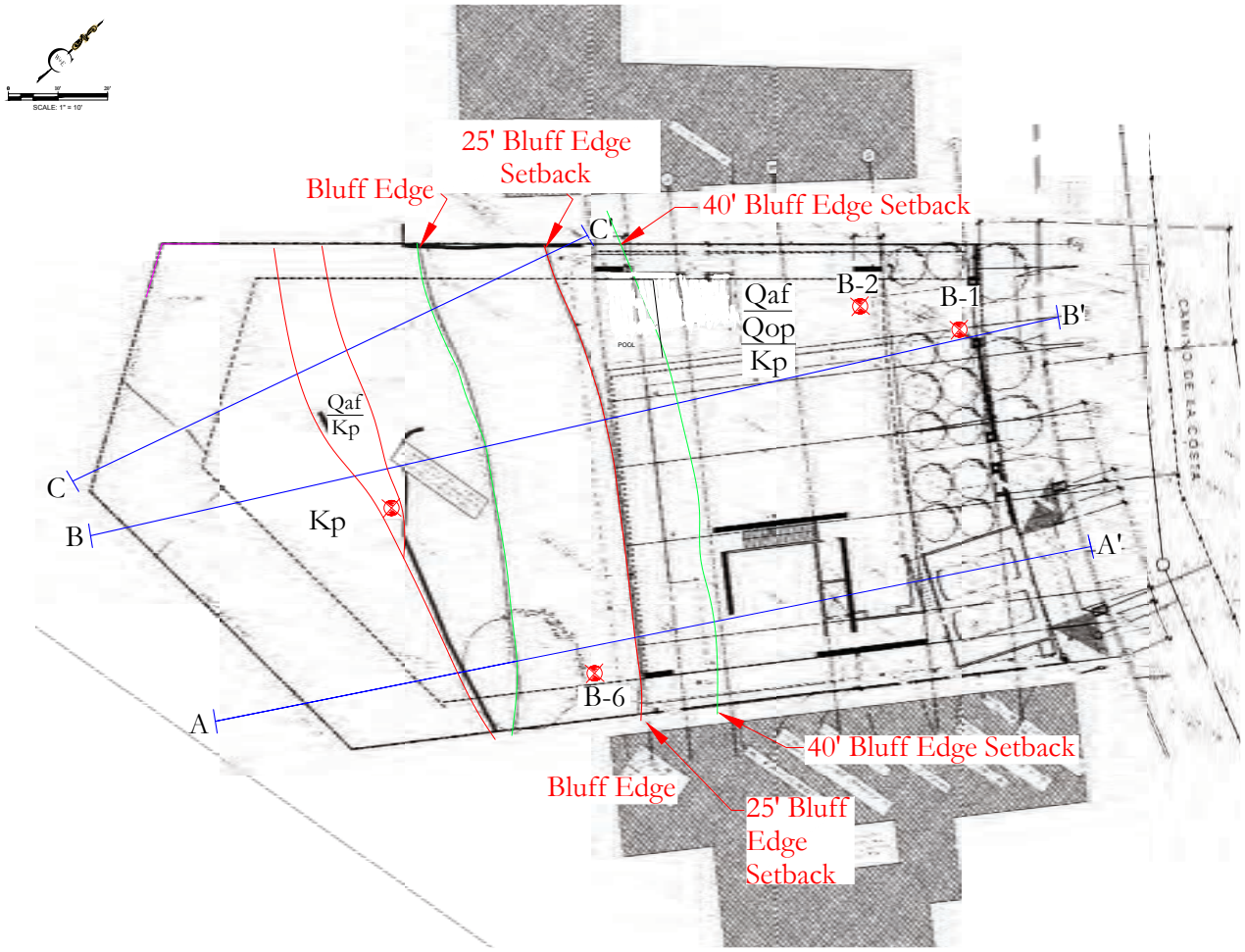


Source: La Jolla Community Plan & SanGIS

Figure 5.2-3

Regional Fault Map

CASA DE LOS AMIGOS



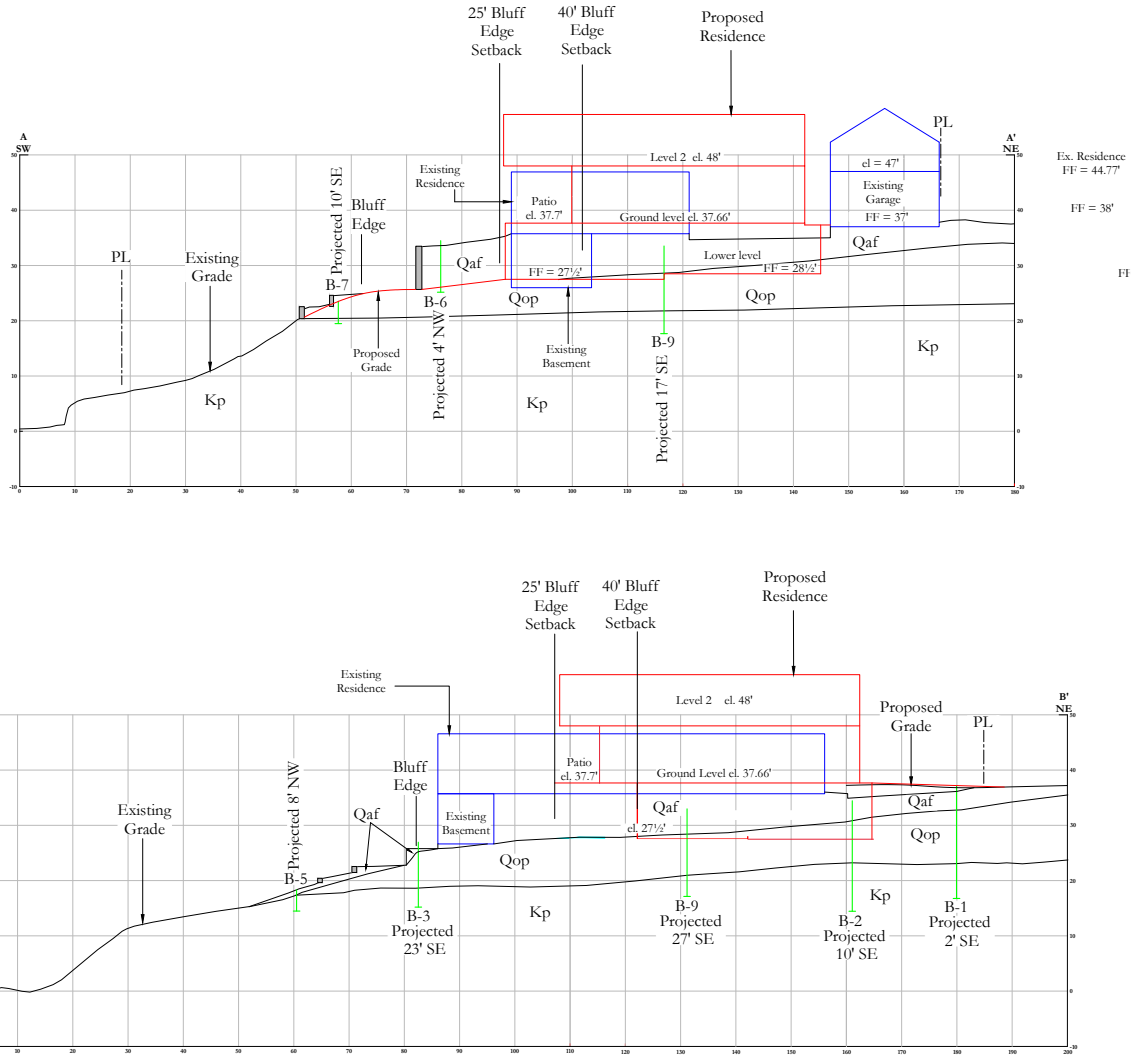
CWE LEGEND

B-9	Approximate Boring Location
P-5	Approximate Hand Auger Location
Qaf / Qop / Kp	Artificial Fill over Old Paralic Deposits over Point Loma Formation
Qaf / Qop	Artificial Fill over Point Loma Formation
Kp	Point Loma Formation
	Geologic Cross Section
?—?	Geologic Contact (Queried where Inferred)

Figure 5.2-1

Geologic Map

CASA DE LOS AMIGOS



CWE LEGEND	
Qaf	Artificial Fill
Qop	Old Paralic Deposits
Kp	Point Loma Formation

Figure 5.2-1

Geologic Map

CASA DE LOS AMIGOS

5.3 Historical Resources

This section of the EIR is based, in part, on the historical resources technical report (HRTR) for the project prepared by BFSA Environmental Services (2023). The results of the investigation are summarized below, with related documentation included in **Appendix D**, *Historical Resources Technical Report*, to this EIR.

5.3.1 Existing Conditions

5.3.1.1 Archaeology

Many areas of San Diego County, including mesas and the coastline, are known for intense and diverse prehistoric occupation and important archaeological resources. The region has been inhabited by various cultural groups for 10,000 years or more. The project site is located on the City of San Diego's Historical Resources Sensitivity map and is in a coastal area that can be sensitive to archaeological resources.

Archaeological resources include prehistoric and historic locations or sites where human actions have resulted in detectable changes to the area. This can include changes in the soil, as well as the presence of physical cultural remains. Archaeological resources can have a surface component, a subsurface component, or both. Historic archaeological resources are those originating after European contact. These resources may include subsurface features such as wells, cisterns, or privies. Other historic archaeological remains include artifact concentrations, building foundations, or remnants of structures.

5.3.1.2 Built Environment

A built environment resource is any aboveground building, structure, object, or district. Historical resources are, or may be, significant architecturally or culturally in local, state, or national history. In general, any object, building, structure, site, area, place, record or manuscript which a Lead Agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the Lead Agency's determination is supported by substantial evidence in light of the whole record (CEQA Guidelines Section 15064.5). For the purposes of CEQA review, a significant historic resource is one that meets the criteria for listing on the California Register of Historic Resources (CRHR), is listed in a local historic register or is deemed significant in a historical resource survey, as provided under PRC Section 5024.1(g) (City of San Diego 2022b).

An HRTR for the property was prepared to determine the potential historical and/or architectural significance of the structures (the residence and detached garage) at the project site. The structures were evaluated to determine if they constitute historic resources, as defined by City of San Diego Historical Resources Board (HRB) eligibility criteria, and CRHR criteria, and to determine whether demolition of the residence would have an adverse effect upon the built environment. In January 2023, the property was designated locally as City of San Diego Historic Site #1481.

Historical research revealed that Casa de los Amigos is not associated with any specific historical events in local, state, or national history. However, the property is associated with Dr. Herbert York, a nuclear physicist and advocate for the elimination of nuclear arms. Although many of York's achievements were accomplished while living in New York and Berkeley and while working on the Manhattan Project, during the time he lived at Casa de los Amigos, he was a physics professor at UCSD, was nominated for and served a second term as UCSD chancellor. As chancellor, Dr. York attracted many outstanding individuals from the scientific community to the area. As a recognized public education institution, it continues to do so today.

The two-story asymmetrical, Spanish-Revival-style, single-family residence and detached garage with maid's quarters above was designed by San Diego Master Architect Herbert E. Palmer. Construction of the structures was completed on December 31, 1924. Since that time, the residence has undergone alterations primarily on the west façade, consisting of the extension and partial enclosure of the rear balcony and construction of a finished basement between 1934 and 1939, with the replacement of four original windows on the west façade after 1946. Other modifications made to the property since its construction include replacement of the door to the garage located beneath the arcaded walkway, the addition of wrought iron grilles on the arcaded south façade of the north wing of the residence; insertion of half windows on the arcaded walkway of the south wing of the residence; replacement of the original garage door; and alteration of landscaping.

Historical Setting

The first purchase of Pueblo Lands in the La Jolla area occurred on February 27, 1869, when the City of San Diego sold Pueblo Lot 1261 to Samuel Sizer. On the same day, the City sold Pueblo Lot 1259 to Daniel Sizer. Both lots, which sold for $1.25 per acre, were located south of "La Hoya Valley." When Sizer's agricultural development to the south is described in the San Diego Union (1869), the canyon is referred to as "La Hoya." By the 1870s, excursions to the point and cove were offered by the Horton House in their Concord Coach, a stagecoach drawn by four horses.

The boom of the 1880s extended to La Jolla in the form of the construction of a hotel and rental cottages. Initially, water supplies were unreliable, consisting of only two sources: a small well in Rose Canyon and a small pipeline connected to the Pacific Beach water supply. Reliable transportation to La Jolla came with the extension of the San Diego, Old Town, and Pacific Beach Railway to La Jolla in 1894. This narrow-gauge railroad was responsible for bringing passengers and prefabricated cottages (on flat cars) to the growing community.

As the number of residences and businesses increased in La Jolla, so did the need for public services. On July 10, 1888, the San Diego City Council passed an ordinance providing for the disposal for garbage, night soil, dead animals, ashes, and rubbish. In 1909, natural gas was brought to La Jolla, and in 1911, electricity was made available to the community. An electric railway provided service to La Jolla between 1924 and 1940. In 1918, street paving began, and by 1922, the Girard Street business section was completely paved. As the development of La Jolla continued, other subdivisions and plots were converted from farming and/or grazing to residential use.

La Jolla Hermosa was La Jolla's first planned residential community and was modeled after the suburban developments occurring near other major United States cities. The tract was and remains a textbook example of business acumen and understanding. Rapidly developed in 1923, Hermosa established an early lead in the competitive subdivision battles to follow. From the beginning, La Jolla Hermosa proved viable. The extensive improvement program, the building restrictions, and the availability of the finest architects provided for a sound and feasible investment. La Jolla Properties targeted its audience. The advertisements appealed to a distinct class of people, and higher lot prices virtually guaranteed purchase by upper-income families. Finally, the development only furnished first-class amenities. The seaside location, the 4-inch concrete paved roads and alleys, and the carefully planted palm trees contributed to the excellent reputation acquired by the tract. La Jolla Hermosa proved to those in its wake the ability of a subdivision to establish community identity and reap financial rewards in the process.

In contrast to the small vacation cottages built in the Barber Tract or La Jolla Village, La Jolla Hermosa was oriented toward attracting year-round residents. During World War II, two military training camps came to La Jolla (Camp Callan and Camp Elliot), and two emplacements on Mount Soledad and one on the beach in La Jolla were established. Although these military installations were replaced after the Korean War with the University of California at San Diego campus and the expansion of the Scripps Institution of Oceanography, La Jolla's economic base gained a substantial business element. This trend continues with ever-present tourism playing a significant part in the local economy. The residential population has historically included permanent and seasonal residents, many of whom have achieved a significant degree of financial and historical notoriety and success.

5.3.1.3 Methods and Results

Archival Research

Determinations of historical and architectural significance require a number of issues to be considered. Factors of significance include: the property's history, both construction and use; the history of the surrounding community; the potential for important persons or events to be associated with the property over its life span; the number of resources associated with the property; the potential for the resources to be the work of a master craftsman, architect, landscape gardener or artist; what historical, architectural, or landscape influences have shaped the design of the property and its pattern of use; what alterations have taken place over the years and how have any changes affected the historical integrity of the property; and the integrity of the property. These questions and related issues must be answered before a final determination of significance can be achieved.

The archival research conducted for the HRTR included a review of records relating to the ownership and developmental history of the site, which would fulfill the requirements of Appendix E of the City of San Diego HRB guidelines, as well as identify any associated historic persons and events or architectural significance. The records research was conducted at the BFSA research library, the San Diego History Center, La Jolla Historical Society, and the offices of the San Diego Assessor/County Recorder/County Clerk. Sanborn Fire Insurance maps were accessed at the San Diego Public Library; however, the parcel is outside of the coverage area of the maps. Title records for the property were also obtained, including documentation obtained from California Lot Book, Inc. Appendix C of the

HRTR contains maps of the property, including a City of San Diego 800-foot Scale Engineering Map; historic USGS maps from 1904, 1943, 1953, and 1967; a current USGS project location map; the original subdivision map; and the current Assessor's parcel map. No original plans for the structures at the project site could be located and they were not on file at the La Jolla Historical Society.

Property History

The project site was developed within the La Jolla Hermosa neighborhood in 1924, with Herbert E. Palmer serving as the architect. Palmer is recognized by the City of San Diego as a Master Architect. The residence at the project site was the only home in the Hermosa neighborhood to be designed by Palmer, making it unique among the other buildings in the Hermosa neighborhood. In addition, the residence and detached garage/maid's quarters are associated with Dr. Herbert York, nuclear physicist and advocate for the cessation of nuclear weapon use. Dr. York owned the property from 1964 until his death in 2009. Ownership of the property remained in Herbert York's name until it passed to a successor trustee in 2021. Although the property is clearly associated with Dr. York, Casa De Los Amigos is not the site of any significant achievements in nuclear physics, since his most important work conducted while he lived in the home was at the University of California San Diego, in Geneva, Switzerland, in Washington, D.C., or at other locations where he gave lectures on his position regarding the use of nuclear arms.

Field Survey

In addition to the archival research described above, a field survey was conducted by the consultant team in February 2022. Photographic documentation was completed as part of the survey. Preparation of architectural descriptions was conducted in the field and supplemented using photographic documentation. In addition, a Historic American Buildings Survey (HABS) (Segal 2023) and Historical Resources Technical Report (BFSA, 2022) were completed.

5.3.2 Regulatory Framework

5.3.2.1 Federal Regulations

The National Historic Preservation Act of 1966

The National Historic Preservation Act of 1966 (NHPA) established the National Register of Historic Places (NRHP) as the official federal list of cultural resources that have been nominated by state offices for their historical significance at the local, state, or national level. Listing in the NRHP provides recognition that a property is significant to the nation, the state, or the community and assumes that federal agencies consider historic values in the planning for federal and federally assisted projects. Properties listed in the NRHP, or "determined eligible" for listing, must meet certain criteria for historical significance and possess integrity of form, location, and setting. Structures and features must usually be at least 50 years old to be considered for listing in the NRHP, barring exceptional circumstances. Criteria for listing in the NRHP, which are set forth in Code of Federal Regulations (CFR) Title 36, Part 60, are the quality of significance in American history, architecture, archaeology,

engineering, and culture as present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and:

(a) That are associated with events that have made a significant contribution to the broad patterns of our history; or

(b) That are associated with the lives of persons significant in our past; or

(c) That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

(d) That have yielded, or may be likely to yield, information important in prehistory or history.

Eligible properties must meet at least one of the criteria and exhibit integrity, measured by the degree to which the resource retains its historical properties and conveys its historical character, the degree to which the original fabric has been retained, and the reversibility of changes to the property. When evaluating a historic resource, integrity is the authenticity of the resource's physical identity clearly indicated by the retention of characteristics that existed during its period of significance. The seven aspects of integrity include location, design, setting, materials, workmanship, feeling, and association. The fourth criterion listed above is typically reserved for archaeological and paleontological resources. These criteria have largely been incorporated into the CEQA Guidelines as well, as discussed below.

Application of National Register of Historical Places Criteria

The NRHP criteria were applied to the locally listed Casa De Los Amigos to determine if the historical resource also merits listing on the NRHP. Based on the detailed evaluation contained in the HRTR, Casa De Los Amigos meets NRHP Criteria A, B, and C; however, Casa De Los Amigos was determined ineligible for nomination to the NRHP because it only meets six of the seven aspects of integrity (location, design, materials, workmanship, feeling, and association) used in evaluating a historic resource. As such, Casa De Los Amigos is ineligible for nomination to the NRHP because it lacks integrity of setting.

Secretary of the Interior's Standards for the Treatment of Historic Properties

Under the NHPA, the U.S. Secretary of the Interior is responsible for establishing professional standards and for providing guidance on the preservation of the nation's historic properties. The Secretary of the Interior's Standards for the Treatment of Historic Properties apply to all grants-in-aid projects assisted through the Historic Preservation Fund (authorized by the NHPA) and are intended to be applied to a wide variety of resource types, including buildings, sites, structures, objects, and districts. The Standards address four treatments: preservation, rehabilitation, restoration, and reconstruction. The treatment Standards, developed in 1992, were codified as 36 CFR Part 68 in the July 12, 1995, *Federal Register* (Vol. 60, No. 133). They replaced the 1978 and 1983 versions of 36 CFR Part 68, titled The Secretary of the Interior's Standards for Historic Preservation Projects. The revised Guidelines replace the Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, published in 1995 to accompany the treatment Standards. The Secretary of the Interior's Standards for the Treatment of Historic Properties are regulatory only for projects receiving Historic Preservation Fund grant assistance and other federally assisted projects. Otherwise, these guidelines are intended to provide general guidance for work on any historic building.

5.3.2.2 State Regulations

California Environmental Quality Act

CEQA requires state and local public agencies to identify the environmental impacts of proposed discretionary activities or projects, determine if the impacts will be significant, and identify alternatives and mitigation measures that will substantially reduce or eliminate significant impacts to the environment.

Historical resources are considered part of the environment, and a project that may cause a substantial adverse effect to the significance of a historical resource is a project that may have a significant effect on the environment. "Historical resource" applies to a building and/or structure that:

1. Is listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (PRC Section 5024.1, Title 14 CCR, Section 4850 et seq.); or
2. Is included in a local register of historical resources, or is identified as significant in an historical resource survey meeting the requirements of Public Resources Code (PRC) Section 5024.1(g) of the; or
3. Is a building or structure determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

Lead agencies have a responsibility to evaluate historical resources prior to making a finding as to a proposed project's impacts. Mitigation of adverse impacts is required if the proposed project will cause substantial adverse change. Substantial adverse changes include demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired. While demolition and destruction are obvious significant impacts, it is more difficult to assess when change, alteration, or relocation crosses the threshold of substantial adverse change. The CEQA Guidelines provide that a project that demolishes or alters those physical characteristics of an historical resource that convey its historical significance (i.e., its character-defining features) is considered to materially impair the resource's significance.

California Register of Historic Resources

State law also protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The California criteria for the CRHR are nearly identical to those for the NRHP. The State Historic Preservation Officer maintains the CRHR. Properties listed, or formally designated eligible for listing, in the NRHP are automatically listed in the CRHR, as are State Landmarks and Points of Interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys. The state criteria are described below.

Application of California Register of Historical Resources Criteria

The CRHR criteria for evaluating the significance of historical resources require that the resource be significant at the local, state, or national level under one or more of the following four criteria:

1. *Association with Events:* It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
2. *Association with Persons:* It is associated with the lives of persons important to local, California, or national history.
3. *Design/Construction:* It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values.
4. *Archaeology:* It has yielded or has the potential to yield information important to the prehistory or history of the local area, California, or the nation.

Based on the detailed evaluation contained in the HRTR, Casa De Los Amigos is eligible for listing in the CRHR under Criterion 1 (significant events), Criterion 2 (significant person), and Criterion 3 (architecture). In regard to Criterion 1, the property is within the La Jolla Hermosa neighborhood, which was the largest subdivision in San Diego by 1927, was La Jolla's first planned residential community, and was uniquely intended for year-round residency. Additionally, the property represents the only Hermosa home designed by San Diego Master Architect Herbert Palmer, making it unique among the other buildings in the Hermosa neighborhood. The property meets Criterion 2 due to its association with Dr. Herbert York, a nuclear physicist and advocate for the elimination of nuclear arms. While most of his scientific contributions to the field of nuclear physics occurred prior to moving to Casa De Los Amigos, his active role in attempting to curtail the use of nuclear weapons occurred while he was living at Casa De Los Amigos. For Criterion 3, Casa De Los Amigos is representative of the work of San Diego Master Architect Herbert Palmer, and the modifications made since its initial construction have not negatively impacted the original design. The HRTR also found the property eligible for its Spanish Revival-style (Spanish Colonial Revival) architecture. This architectural architecture played a significant role in the development of communities around the turn of the 20th century. The property does not have important information to contribute to our understanding of human history and prehistory, and therefore, is not eligible for listing under Criterion 4.

Native American Historic Resource Protection Act

The Native American Historic Resource Protection Act (California PRC Section 5097 et seq.) addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction. It establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project. The Native American Historic Resource Protection Act establishes the Native American Heritage Commission (NAHC) as the authority to resolve disputes regarding the disposition of such remains.

California Health and Safety Code

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment of disposition of those

remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County coroner has examined the remains. California PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason the believe the remains are those of a Native American, the coroner must contact the NAHC within 24 hours. The NAHC will notify the Most Likely Descendant. With the permission of the landowner, the Most Likely Descendant may inspect the site of the discovery. The inspection must be completed within 48 hours of notification of the Most Likely Descendant by the NAHC. The Most Likely Descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains, and items associated with Native Americans.

5.3.2.3 Local Regulations

City of San Diego Historical Resource Regulations

The City's Historical Resources Regulations are contained in San Diego Municipal Code (SDMC) Chapter 14, Article 3, Division 2. The purpose and intent of the Regulations are outlined as follows:

> *To protect, preserve, and where damaged, to restore the cultural resources of San Diego, which include historical buildings, historical structures or historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. These regulations are intended to ensure that development occurs in a manner that protects the overall quality of historical resources. It is further the intent of these regulations to protect the educational, cultural, economic, and general welfare of the public, while employing regulations that are consistent with sound historical preservation principles and the rights of private property owners.*

The regulations apply to all development with the city when cultural resources are present within the premises, regardless of the requirement to obtain a Neighborhood Development Permit or Site Development Permit. The regulations have been developed to implement applicable local, state, and federal policies and mandates. Included in these are the General Plan, CEQA, and NHPA. Historical resources, in the context of the city's regulations, include site improvements, buildings, structures, historic districts, signs, features (including significant trees or other landscaping), places, place names, interior elements and fixtures designated in conjunction with a property, or other objects of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the city. These include structures, buildings, archaeological sites, objects, districts, or landscapes having physical evidence of human activities. These resources are usually over 45 years old, and they may have been altered or still be in use.

City Historic Resources Register

According to the City's Historical Resources Guidelines (2001), any improvement, building, structure, sign, interior element and fixture, site, place, district, area, or object may be designated as historic by the City's HRB if it meets any of the following criteria:

A. Exemplifies or reflects special elements of the City's, a community's or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development;

B. Is identified with persons or events significant in local, state, or national history;

C. Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;

D. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist or craftsman;

E. Is listed on or has been determined eligible by the National Park Service for listing on the NRHP or is listed or has been determined to be eligible by the California Office of Historic Preservation (OHP) for listing on the CRHR; or

F. Is a finite group of resources related to one another is a clearly distinguishable way; or is a geographically deniable area or neighborhood containing improvements which have a special character, historical interest or aesthetic value; or which represent one or more architectural periods or styles in the history and development of the City.

Application of City Historic Resources Register

As previously discussed, Casa De Los Amigos was designated as City of San Diego Historic Site #1481 in January 2023. The property was determined significant under HRB Criterion A with respect to architectural and historical development, HRB Criterion B for its association with Dr. Herbert York, HRB Criterion C as an example of the Spanish Colonial Revival style of architecture and for HRB Criterion D as a notable work of San Diego Master Architect Herbert Palmer.

City of San Diego General Plan

The Urban Design Element and the Historic Preservation Element of the City of San Diego General Plan (City of San Diego 2008c and 2008d, respectively) provides goals and policies related to historic resources. The project's consistency with these goals and policies are discussed in Section 5.1, *Land Use*, of this EIR.

La Jolla Community Plan and Local Coastal Program Land Use Plan

The La Jolla Community Plan and Local Coastal Program Land Use Plan contains goals, policies, and plan recommendations related to historic resources. These goals, policies, and plan recommendations are contained in the Heritage Resources Element of the Plan. The project's consistency with applicable goals, polices, and plan recommendations are discussed in Section 5.1, *Land Use*, of this EIR.

5.3.3 Impact: Prehistoric or Historic Archaeology

Issue 1: Would the project result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, or object or site?

5.3.3.1 Impact Thresholds

Based on the City of San Diego's Significance Determination Thresholds (2022), historical resource impacts may be significant if the project would affect any of the following:

- A resource listed in, eligible for, or potentially eligible for the NRHP.
- A resource listed in, or determined to be eligible by, the State Historical Resources Commission, for listing in the California Register of Historical Resources (Public Resources Code Section 5024.1).
- A resource included in a local register of historical resources, as defined in Public Resources Code Section 5020.1(k), or identified as significant in a historical resource survey meeting the requirements of Public Resources Code Section 5024.1(g).
- Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Public Resources Code Section 5024.1), including the following criteria:
    a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
    b. Is associated with the lives of persons important in our past;
    c. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
    d. Has yielded, or may be likely to yield, information important in prehistory or history.

The determination of significance of impacts on historical and unique archaeological resources is based on the criteria found in CEQA Guidelines Section 15064.5. Section 15064.5 clarifies the definition of a substantial adverse change in the significance of a historical resource as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired."

5.3.3.2 Impact Analysis

Archaeological Resources

The project site is located on the City of San Diego's Historical Resources Sensitivity map, which takes into consideration the potential for archaeological resources. A record search of the California Historic Resources Information System (CHRIS) digital database was reviewed by qualified archaeological City staff to determine the presence or absence of potential archaeological resources within the project site. The CHRIS search did not identify any recorded archaeological sites within or adjacent to the property.

Most archaeological sites have some surface expression; however, some sites have been found within inches of the ground surface. The likelihood of encountering archaeological resources is greatest on sites that have been minimally excavated in the past (e.g., undeveloped parcels, vacant lots, and lots containing surface parking). Previously excavated areas are generally considered to have a low potential for archaeological resources, since the soil containing the archaeological resources has been removed.

Based upon the negative CHRIS search and the previously disturbed nature of the project site; qualified archaeological City staff determined that the project site has no potential for archaeological resources.

Built Environment

As discussed in the HRTR, the buildings on the project site were evaluated for eligibility for listing in the California and local registers. Casa De Los Amigos is listed l on the San Diego Register of Historical Resources (SDRHR) and has been determined eligible for listing on the CRHR under HRB Criterion A and CRHR Criterion 1 as the oldest intact residential structure in La Jolla Hermosa HRB Criterion B and CRHR Criterion 2 for its association with Herbert York; HRB Criterion C and CRHR Criterion 3 as a good example of the Spanish Revival architectural style; and HRB Criterion D as a notable example of the work of San Diego Master Architect Herbert E. Palmer. Casa De Los Amigos was determined ineligible for nomination to the NRHP due to loss of original setting. As discussed previously, the property was designated as City of San Diego Historic Site #1481 in January 2023.

In determining potential impacts to historic resources under CEQA Section 15064.5, a "project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have significant effect on the environment." A "substantial adverse change" means "demolition, destruction, relocation, or alteration of the resource such that the significance of a historical resource would be materially impaired" (PRC Section 5020.1[q]). Casa De Los Amigos has been listed in the SDRHR and evaluated as eligible for listing on the CRHR, and the project proposes demolition of the existing residence (while retaining and rehabilitating the detached garage and stucco privacy wall). As such, the project would constitute a negative impact to the historical resource (demolition). CEQA Guidelines Section 15064.5(b)(1) define a substantial adverse change (such as physical demolition, destruction, relocation, or alteration the resource or its immediate surroundings) as one that would materially impair the significance of an historical resource.

The detached garage and stucco privacy wall, which are both visible from the adjacent street, would be retained and rehabilitated in accordance with the U.S. Secretary of the Interior Standards for

Rehabilitation. Rehabilitation would generally entail protecting, bracing and stabilizing the clay tile roof structure, chimney structure and walls of the garage, while restoring its stucco treatments, removing the existing garage door oriented toward the internal courtyard, and incorporating new garage doors facing the street. Certain walls, staircases and structurally unsound slabs may be removed and reconstructed as part of the rehabilitation process. Windows on the garage would be protected in place. Clay tile roofing material on the exterior patio roof above the staircase unit would be salvaged during reconstruction. The existing stucco privacy walls facing Camino De La Costa would also be structurally rehabilitated and stucco repaired while existing gates would be replaced with original-style gates. The decorative columns incorporated into the existing stucco walls would be retained. The stucco wall's existing clay tile roof structure would be stabilized and the Casa De Los Amigos graphic on its facade would be protected in place.

The project is not expected to have a significant indirect impact to historical resources due to the built-up nature of the area, new or recent development surrounding the property, lack of sensitive resources (including historic districts), and limited viewsheds.

5.3.3.3 Significance of Impacts

Archaeological Resources

It was determined that based upon the CHRIS search, review of site conditions, and the scope of work that there is not a potential for the project to impact archaeological resources. No impacts were identified and significant impacts would not occur.

Built Environment

The project proposes the demolition of a single-family residence that is listed as a locally-important historical resource and is recommended as eligible for listing in the CRHR, which is considered a substantial adverse change to the historical resource pursuant to CEQA Section 21084.1. Therefore, according to the CEQA Guidelines, this action constitutes a significant effect on the environment and material impairment on a historical resource pursuant to CEQA Section 15064.5(b) and the impacts would be significant.

5.3.3.4 Mitigation Monitoring and Reporting

Archaeological Resources

No mitigation measures are required.

Built Environment

The following measures shall be implemented in accordance with Chapter 14, Article 3, Division 2, Historical Resources Regulations of the Land Development Code (LDC) to reduce the project's historical resources impacts to the extent feasible. As the project would demolish part of the locally designated and CRHR-eligible historical resource, impacts would be mitigated to the extent feasible through implementation of mitigation measures HR-1, HR-2, and HR-4. However, impacts associated with the demolition of the residence would remain significant and unavoidable. Impacts associated

with rehabilitation of the detached garage and stucco privacy wall would be reduced to less than significant with the implementation of mitigation measure HR-3.

HR-1: Historic American Building Survey (HABS) Documentation. Prior to issuance of a demolition permit for the residence, Casa De Los Amigos shall be documented to Historic American Building Survey (HABS) Level II standards according to the outline format described in the *Historic American Building Survey Guidelines for Preparing Written Historical Descriptive Data*. The documentation shall be undertaken by a qualified professional who meets the Secretary of the Interior's *Professional Qualification Standards* (36 CFR, part 61) for history or architectural history. The documentation shall contain the following:

1. *Measured Drawings:* Drawings produced according to HABS guidelines depicting existing conditions or other relevant features of historic buildings, sites, structures, objects, or landscapes.
2. *Photographic Documentation:* Documentation should follow the Photographic Specification–Historic American Building Survey, including 15 to 20 archival quality, large-format photographs of the exterior and interior of the building and its architectural elements. Construction techniques and architectural details should be documented, especially noting the measurements, hardware, and other features that tie architectural elements to a specific date.
3. *HABS Historical Report:* A written historical narrative and report completed according to the HABS Historical Report Guidelines.

Following completion of the HABS documentation and approval by the HRB, the documentation shall be placed on file with the City of San Diego, the San Diego History Center, and the San Diego Central Library.

HR-2: Salvage. Prior to the issuance of a demolition permit for the residence, architectural materials from the site shall be made available for donation to the public. Material to become architectural salvage shall include historic-period elements, including the original clay roof tiles and the decorative medallions at the roofline of the main structure. The key exterior and interior elements inventory shall be developed before the demolition or grading permit issuance. The materials shall be removed prior to or during demolition. Contaminated, unsound, or decayed materials shall not be included in the salvage program nor be available for future use. Once the items for salvage are identified, the project applicant's qualified historic preservation professional (QHPP) shall submit this information to the City's Historical Resource Section for approval. Salvaged material will be first used to replace any damaged pieces on the garage or site wall rehabilitation as required. Following approval of the salvage plan, the QHPP, in concert with the City's Historical Resources Section, shall notify the La Jolla Community Planning Group, the La Jolla Historic Society, the University of California, San Diego Historical Archives, and local preservation groups via email concerning the availability of the salvaged materials. Interested parties shall make arrangements to pick up the materials after they have been removed from the property. The project applicant shall be responsible for storing the salvaged materials in an appropriate climate-controlled storage space for no more than 90 days after proper notice is given to the above parties.,. Prior to any plans to no longer use the storage space, the applicant shall provide the City's Historical Resources Section with an inventory of any materials that were

not donated to any interested parties and measures to be taken by the project applicant to dispose of these materials.

HR-3: Rehabilitation Work and Monitoring Plan. Rehabilitation of the garage and site wall shall be overseen by a construction monitor trained in the protection of historic structures. Rehabilitation work on the detached garage and stucco privacy wall shall adhere to *U.S. Secretary of the Interior Standards for Rehabilitation* and will be documented in a treatment plan. The treatment plan will consist of drawings detailing the rehabilitation work and an accompanying narrative approved by the HRB and City Heritage Preservation staff. Prior to the start of rehabilitation work, a monitoring plan shall be prepared by the project proponent and submitted to the City Development Services Department for review and approval. The monitoring plan shall designate a qualified historic monitor and set forth a plan for protecting the historic elements of the project that would be retained during construction and rehabilitation activities. The treatment plan and monitoring plan shall detail the proposed rehabilitation work for the project, with steps identified for each portion of the preparation, rehabilitation, and restoration of the detached garage and stucco privacy wall.

HR-4: Interpretation Plaque (or Display Panels or Story Board). Interpretive signage display panels or storyboards shall be installed in a publicly visible location, near the northern corner of the property, in the public sidewalk right-of-way. The installation shall describe the history and significance of Casa De Los Amigos under Criteria A, B, C, and D. The installation shall be reviewed and approved by the City's Historical Resources Board Staff.

5.3.4 Impact: Religious or Sacred Uses

Issue 2: Would the project result in any impact to the existing religious or sacred uses within the potential impact area?

5.3.4.1 Impact Thresholds

Based on the City of San Diego's Significance Determination Thresholds (2022), prehistoric and historic resource impacts may be significant if the project would result in impacts to:

- A religious property deriving primary significance from architectural or artistic distinction or historical importance; and/or
- A site associated with a burial or cemetery; religious, social, or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the belief system of a discrete ethnic population.

5.3.4.2 Impact Analysis

Based on the records search conducted for the project site by qualified archaeological City staff, no religious or sacred uses are known to exist within or adjacent to the project site. Taking into consideration the records search results, the project scope, and the previously disturbed nature of the project site (including the presence of fill materials at the project site), no impact to religious or sacred uses is expected as a result of the project. As discussed in Chapter 7, *Other CEQA Sections*, the

City has provided notification to the Iipay Nation of Santa Isabel, the Jamul Indian Village, and San Pasqual Band of Mission Indians, each of which is traditionally and culturally affiliated with the project area, requesting consultation on May 30, 2023. No requests for consultation were received within the 30-day formal notification period, and the City has determined that Tribal Cultural Resources would not be potentially impacted by project implementation.

5.3.4.3 Significance of Impacts

No impact associated with religious or sacred uses would occur during construction or operation of the project.

5.3.4.4 Mitigation Monitoring and Reporting

No mitigation measures are required.

5.3.5 Impact: Human Remains

Issue 3: Would the project result in the disturbance of any human remains, including those interred outside of formal cemeteries?

5.3.5.1 Impact Thresholds

Based on the City of San Diego's Significance Determination Thresholds (2022), prehistoric and historic resource impacts may be significant if the project results in the discovery of human remains.

5.3.5.2 Impact Analysis

No formal cemeteries or known burial sites have been identified on or in the immediate vicinity of the project site. In the unlikely event of the discovery of human remains, the project would be required to comply with California PRC Section 5097.98 and California Health and Safety Code Section 7050.5. These regulations identify procedures to be implemented in the event of a discovery of human remains. Work would be halted, and the procedures identified in PRC Section 5097.98 and the California Health and Safety Code would be followed.

5.3.5.3 Significance of Impacts

Compliance with regulatory requirements would ensure that impacts associated with the discovery of human remains would remain less than significant.

5.3.5.4 Mitigation Monitoring and Reporting

No mitigation measures are required.

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5.4 Hydrology

This section of the EIR is based on the project description and site plan, as well as a review of relevant hydrology plans and maps.

5.4.1 Existing Conditions

5.4.1.1 Hydrology Setting

San Diego County contains eleven major hydrologic units (HUs) west of the Peninsular Range Mountains, with each of the eleven HUs ultimately draining to the Pacific Ocean. The project site is located within the Peñasquitos HU (HU 906), which is a triangular-shaped area of approximately 170 square miles, extending from Poway on the east to La Jolla on the west (California Regional Water Quality Control Board, San Diego Region 1994). There are no major streams in the Peñasquitos HU, although it is drained by numerous creeks and contains two coastal lagoons (Sorrento Lagoon and Mission Bay). Sorrento Lagoon is the mouth of Peñasquitos Creek. Sorrento Lagoon empties into the Pacific Ocean near the northerly boundary of the city. The project site is located within the Scripps Hydrologic Area (HA) (HA 906.3) of the Peñasquitos HU.

The project site contains an existing 5,086 SF 2-story residence and detached garage constructed in 1924 and a coastal bluff on the southwest portion of the site. The coastal bluff contains residential landscaping, a concrete/masonry staircase and several stone retaining walls. The site topography slopes downward westerly toward the coastal bluff and slopes that occur on site. Elevations across the site range from about 1 foot at the southwest corner of the property along the base of the coastal bluff to about 38 feet along the northeast perimeter of the site (San Diego Land Surveying & Engineering 2022). The central and northeastern portions of the project site are characterized by a relatively level pad that supports the existing improvements and descends gently to the southwest. The project site contains 6,235 SF of existing impervious area. The existing site drainage has uncontrolled flow across the site to the Pacific Ocean.

5.4.1.2 Flood Hazards

According to the Federal Emergency Management Agency (FEMA), the majority of the project site is not located within the FEMA 100-year floodplain, but a portion of the coastal bluffs on site are located within a FEMA Special Flood Hazard Area (see **Figure 5.4-1**, *FEMA Flood Hazards*; FEMA Flood Insurance Rate Map No. 06073C1584H, dated December 20, 2019). The majority of the site, which includes the portion containing existing development, is located in FEMA Flood Zone X, which correlates with “area of minimal flood hazard.” A portion of the coastal bluffs located on the project site are within FEMA Flood Zone VE, which are coastal areas with a one percent or greater chance of flooding and an additional hazard associated with storm waves (FEMA 2022).

5.4.2 Regulatory Framework

5.4.2.1 Federal Regulations

National Flood Insurance Program

The National Flood Insurance Act of 1968 established the National Flood Insurance Program in order to provide flood insurance within communities that were willing to adopt floodplain management programs to mitigate future flood losses. This Act also required the identification of all floodplain areas and the establishment of flood-risk zones within those areas. The Flood Disaster Protection Act of 1973 expanded the National Flood Insurance Program by substantially increasing limits of coverage authorized under the program, and by requiring known flood-prone communities to participate in the program and to adopt adequate flood plan ordinances. This Act also made the purchase of flood insurance mandatory for property owners who are being assisted by federal programs, agencies, or institutions in the acquisition or improvement of land or facilities located in identified areas having special flood hazards. The National Flood Insurance Program has been further amended by subsequent reform acts. The FEMA is the primary agency responsible for administering programs and coordinating with communities to establish effective floodplain management standards. FEMA is responsible for preparing Flood Insurance Rate Maps, which delineate both the special flood hazard areas and the risk premium zones applicable to the community.

5.4.2.2 Local Regulations

Drainage Design Manual

The City's Drainage Design Manual provides policies and procedures to attain reasonable standardization of drainage design throughout the City. The Drainage Design Manual establishes design standards and design procedures for storm water conveyance and hydrology analysis for flood management and water quality facilities in the City. These design standards and procedures provide guidance to design engineers, developers, contractors, and others in the selection, design, construction, and maintenance of storm water conveyance facilities.

Grading Regulations

San Diego Municipal Code (SDMC) Section 142.0101 et seq., *Grading Regulations*, addresses slope stability, protection of property, erosion control, water quality, landform preservation, and paleontological resources preservation, and protection of the public health, safety, and welfare of persons, property, and the environment. Requirements related to hydrology include implementation of temporary and permanent erosion, sedimentation, and water pollution control measures and shall include measures from those outlined in SDMC Chapter 14, Article 2, Division 2, Storm Water Runoff Control and Drainage Regulations.

Storm Water Standards Manual

The City's Storm Water Standards Manual was developed to comply with National Pollutant Discharge Elimination Program (NPDES) permits administered by the State of California. To comply

with permit requirements, the City is required to develop and implement stormwater pollution controls for private and public development projects for both the construction and post-construction phases. Storm water pollution controls, in the form of both structural and non-structural Best Management Practices (BMPs) are designed to reduce pollutants discharged from project sites to the maximum extent practicable. The City has developed the Storm Water Standards in response to the NPDES permits, which is divided into the following three parts:

- Part 1, *BMP Design Manual for Permanent Site Design, Storm Water Treatment, and Hydromodification Management*, complies with the Regional MS4 Permit regulating postconstruction stormwater discharges onsite.
- Part 2, *Construction BMP Standards*, complies with the Regional MS4 Permit and the CGP regulating construction-phase stormwater discharges.
- Part 3, *Offsite Storm Water Alternative Compliance Program for Water Quality and Hydromodification Control*, complies with the Regional MS4 Permit regulating post-construction stormwater discharges offsite.

City of San Diego General Plan

The Public Facilities, Services, and Safety Element of the City of San Diego General Plan (City of San Diego 2022c) provides goals and policies related to hydrology. The project's consistency with these goals and policies are discussed in Section 5.1, *Land Use*, of this EIR.

La Jolla Community Plan and Local Coastal Program Land Use Plan

The La Jolla Community Plan and Local Coastal Program Land Use Plan contains policies and plan recommendations related to hydrology. These policies and plan recommendations are contained in the Natural Resources and Open Space System Element and Residential Land Use Element of the Plan. The project's consistency with applicable polices and plan recommendations are discussed in Section 5.1, *Land Use*, of this EIR.

5.4.3 Impact: Runoff and Drainage Patterns

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

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

5.4.3.1 Impact Thresholds

Based on the City of San Diego's Significance Determination Thresholds (2022), hydrology impacts may be significant if the project would:

- Grade, clear, or grub more than 1.0-acre of land, especially in slopes over a 25 percent grade and would drain into a sensitive water body or stream, and uncontrolled runoff results in erosion and subsequent sedimentation of downstream water bodies.

- Result in modifications to existing drainage patterns that cause significant impacts on environmental resources such as biological communities and archaeological resources.
- Result in decreased aquifer recharge or result in extraction from an aquifer resulting in a net deficit in the aquifer volume or reduction in the location groundwater table.

5.4.3.2 Impact Analysis

Construction of the project would remove the existing residence, including the basement, and associated hardscape, although the historic garage structure and portions of the stucco privacy wall and gate would be retained. The project would also remove the existing stone walls and staircase that occur west of the bluff edge on the property. With the exception of the removal of the existing stone walls and staircase, demolition and construction activities would occur within the developed portion of the project site. During site preparation and construction, stormwater drains would be constructed adjacent to the new residential structure, which would collect and direct stormwater away from the on-site coastal bluffs. Stormwater would be collected in a sump basin and pumped to the street for discharge via an under-sidewalk drain to the existing stormwater infrastructure in the public right-of-way for Camino De La Costa.

As discussed in the *Existing Conditions* subsection above, there are 6,235 SF of existing impervious surfaces on the project site. Upon implementation of the project, there would be 5,755 SF of impervious surfaces, resulting in an overall reduction of impervious surfaces at the project site. The project would comply with the requirements of the City's Stormwater Standards Manual by including a sump basin to collect stormwater flows and pump the flows to existing off-site stormwater infrastructure. Drought-tolerant landscape materials would be installed to prevent shoreline erosion and all runoff/drainage produced by the project would be collected, treated, and pumped to the stormwater infrastructure in the public road, thus, diverting runoff away from the coastal bluffs. Additionally, the project would be required to implement a Water Pollution Control Plan (WPCP), which would require implementation of appropriate BMPs for erosion control, sediment control, run-on and site stormwater management controls, and materials and water management controls. Implementation of BMPs would serve to protect water quality (as discussed in Section 5.5, *Water Quality*) and treat stormwater runoff. Further, the project has been reviewed by City staff for applicable stormwater and drainage requirements. Based on staff review, the proposed project would not have a significant impact on downstream properties and the project's drainage system would be engineered to adequately manage site stormwater. The project would be conditioned to comply with the City's Storm Water Standards Manual and Grading Regulations during and after construction, and appropriate BMPs would be utilized. Implementation of project specific BMPs and compliance with federal, State, and local regulations related to hydrology would preclude impacts associated with increased runoff or altered drainage patterns. Impacts would be less than significant.

5.4.3.3 Significance of Impact

The project would not result in an increase in impervious surfaces at the project site resulting in a decrease in runoff volumes. By adhering to City drainage requirements, including the City's Stormwater Standards Manual and Grading Regulations, as well as compliance with federal, State, and local regulations related to hydrology, the project would not increase the rate or amount of surface runoff or result in a substantial alteration to on- and off-site drainage patterns due to

changes in runoff flow rates or volumes. Compliance with existing regulatory requirements would ensure that impacts would be less than significant.

5.4.3.4 Mitigation Monitoring and Reporting

No mitigation measures are required.

5.4.4 Impact: 100-Year Floodplain

Issue 3: Would the project develop within a 100-year floodplain as identified on Federal Emergency Management Agency (FEMA) maps or impose flood hazards on other properties?

5.4.4.1 Impact Thresholds

Based on the City of San Diego's Significance Determination Thresholds (2022), hydrology impacts may be significant if the project would impose flood hazards on other properties or if the project proposes to develop wholly or partially within the 100-year floodplain identified in the Federal Emergency Management Agency (FEMA) maps.

5.4.4.2 Impact Analysis

The majority of the project site, and the entire developed portion, is located within FEMA Zone X, which is outside of the 100-year flood plain. However, portions of the coastal bluffs are located within FEMA Zone VE, which is a FEMA Special Flood Hazard Area. While the project would remove the existing stone walls and staircase west of the bluff edge, these improvements are not located within the portion of the site designated by FEMA as a Special Flood Hazard Area. Further, the remainder of the site, where demolition, site preparation, and construction would occur, is outside of the FEMA Special Flood Area, and is entirely within FEMA Zone X, outside of the 100-year flood plain. No demolition, site preparation, or construction activities would occur within the FEMA Special Flood Hazard Area on site, which is located entirely within the coastal bluff on the project site. As such, the project would not develop within a 100-year floodplain or impose flood hazards on other properties related to the 100-year floodplain. No impact would occur.

5.4.4.3 Significance of Impact

No impact associated with the 100-year floodplain or flooding would occur.

5.4.4.4 Mitigation Monitoring and Reporting

No mitigation measures are required.

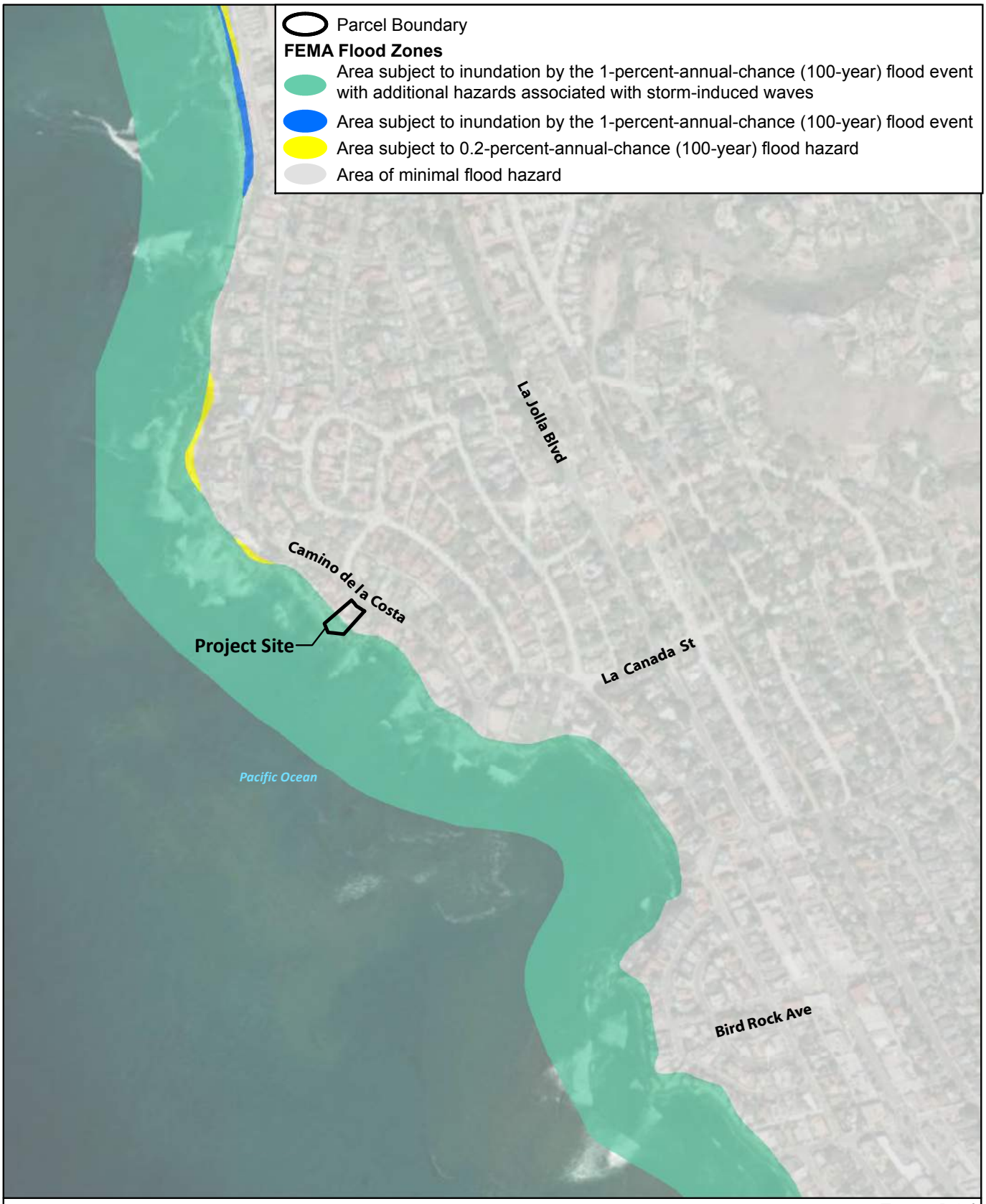

Figure 5.4-1

FEMA Flood Hazards

CASA DE LOS AMIGOS

5.5 Water Quality

This section of the EIR evaluates water quality impacts of the project and is based on the project description and site plan, as well as review of relevant water quality regulations and documents.

5.5.1 Existing Conditions

Receiving Waters and Water Quality Contaminants

The project site is located within the Scripps Hydrologic Area (HA) (HA 906.3) of the Peñasquitos Hydrographic Unit (HU), as discussed in Section 5.4, *Hydrology*. In the existing condition, site drainage has uncontrolled flow across the site to the Pacific Ocean. The Pacific Ocean is the receiving water for discharge from the project site.

Water quality is affected by sedimentation caused by erosion, by runoff carrying contaminants, and by direct discharge of pollutants (point-source pollution). As land is developed, new impervious surfaces send an increased volume of runoff containing oils, heavy metals, pesticides, fertilizers, and other contaminants (non-point-source pollution) into adjacent watersheds. Storm water runoff in urban areas can contain pollutants that contribute to adverse water quality impacts in receiving surface waters. Storm water runoff is generated from a number of sources, including residential areas, commercial and industrial areas, roads, highways, parking lots, and construction activities, among others. Contaminants often found in storm water runoff and potential likely sources of such contamination are summarized in **Table 5.5-1**, *Sources of Contaminants in Urban Stormwater Runoff*.

Table 5.5-1
SOURCES OF CONTAMINANTS IN URBAN STORMWATER RUNOFF

Contaminant	Contaminant Sources
Sediments and Trash/Debris	Streets, landscaping, driveways, parking areas, rooftops, construction activities, atmospheric deposition, drainage channel erosion
Pesticides and Herbicides	Landscaping, roadsides, utility rights-of-way, soil wash-off
Organic Compounds	Landscaping, streets, parking areas, animal wastes, recreation areas
Oxygen Demanding Substances	Landscaping, animal wastes, leaky sanitary sewer lines, recreation areas
Heavy Metals	Automobiles, bridges, atmospheric deposition, industrial areas, soil erosion, corroding metal surfaces, combustion processes
Oil and Grease/Hydrocarbons	Roads, driveways, parking lots, vehicle maintenance areas, gas stations, illicit dumping to storm drains
Bacteria and Viruses	Landscaping, roads, leaky sanitary sewer lines, sanitary sewer cross-connections, animal wastes, recreation areas
Nutrients (Nitrogen and Phosphorus)	Rooftops, landscaping, atmospheric deposition, automobile exhaust, soil erosion, animal wastes, detergents, recreation areas

Source: EPA 1999

Beneficial Uses

The Water Quality Control Plan for the San Diego Basin (California Regional Water Quality Control Board [RWQCB], San Diego Region 1994) establishes beneficial uses for surface waters in the Region. Beneficial uses are defined in the Basin Plan as "the uses of water necessary for the survival or well-being of man, plants, and wildlife. These uses of water serve to promote the tangible and intangible economic, social, and environmental goals of mankind." Beneficial uses that may be protected against quality degradation include, but are not limited to, domestic, municipal, agricultural, and industrial supply; power generation; recreation; aesthetic enjoyment; navigation; and preservation and enhancement of fish, wildlife, and other aquatic resources or preserves. Beneficial uses of coastal waters, specifically the Pacific Ocean, as identified in the Water Quality Control Plan for the San Diego Basin include: Industrial Service Supply; Navigation; Contact Water Recreation; Non-contact Water Recreation; Preservation of Biological Habitats of Special Significance; Wildlife Habitat; Rare, Threatened, or Endangered Species; Marine Habitat; Aquaculture; Migration of Aquatic Organism; Spawning, Reproduction, and/or Early Development; and Shellfish Harvesting (California RWQCB, San Diego Region 1994, Table 2-3).

Clean- Water Act Section 303(d): Impaired Water Bodies and Total Maximum Daily Loads

Section 303(d) of the Clean Water Act (CWA; the CWA is discussed in more detail in Section 5.5.2, *Regulatory Framework*, below) assists states, territories, and authorized tribes in listing impaired waters and developing Total Maximum Daily Loads (TMDLs) for these waterbodies. TMDL establishes the maximum amount of a pollutant allowed in a waterbody and serves as the starting point or planning tool for restoring water quality. Certain Pacific Ocean shoreline segments within the Scripps Hydrologic Area (which the project is located in) are listed as an impaired water body for trash and indicator bacteria. The nearest impacted shoreline segments are Windansea Beach, approximately 0.7 miles north of the project site, and False Point, approximately 1.1 miles south of the project site (California State Water Resources Control Board 2020).

5.5.2 Regulatory Framework

5.5.2.1 Federal Regulations

Clean Water Act

The CWA (33 United States Code §1251 et seq.) (1972) is the primary federal law that protects the nation's waters, including lakes, rivers, aquifers, and coastal areas. The CWA established basic guidelines for regulating discharges of pollutants into the waters of the United States and requires that states adopt water quality standards to protect public health, enhance the quality of water resources, and ensure implementation of the CWA.

CWA Section 401 requires that any applicant for a federal permit to conduct any activity, including the construction or operation of a facility that may result in the discharge of any pollutant, must obtain certification from the state. CWA Section 402 established the National Pollutant Discharge Elimination System (NPDES) to regulate the discharge of pollutants from point sources, and Section 404 established a permit program to regulate the discharge of dredged material into waters of the United States.

Under CWA Section 303(d), states, territories, and authorized tribes are required to develop lists of impaired waters that are too polluted or otherwise degraded to meet the water quality standards set by states, territories, or authorized tribes. The law requires that these jurisdictions establish priority rankings for waters on the lists and develop TMDLs to identify the maximum amount of a pollutant that a waterbody can receive and still safely meet water quality standards.

5.5.2.2 State Regulations

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act established the principal California legal and regulatory framework for water quality control. The Porter-Cologne Water Quality Control Act is embodied in the California Water Code. The California Water Code authorizes the State Water Resources Control Board (SWRCB) to implement the provisions of the federal CWA. The state of California is divided into nine regions governed by RWQCBs. The RWQCBs implement and enforce provisions of the California Water Code and the CWA under the oversight of the SWRCB. The City is located within the purview of the San Diego RWQCB (Region 9). The Porter-Cologne Act also provides for the development and periodic review of Basin Plans that designate beneficial uses of California's major rivers and other surface waters and groundwater basins and establish water quality objectives for those waters.

National Pollutant Discharge Elimination System Construction General Permit

The SWRCB has issued a General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit, NPDES No. CAS000002, SWRCB Order 2009-0009-DWQ). The NPDES Construction General Permit regulates certain stormwater discharges from construction sites with a disturbed area of one acre or more. Storm water discharges from construction sites with a disturbed area of one acre or more are required to either obtain individual NPDES permits for storm water discharges or to be covered by the Construction General Permit. As the project site is less than one acre, the NPDES Construction General Permit would not apply.

National Pollutant Discharge Elimination System Municipal Permit

The Municipal Permit implements a regional strategy for water quality and related concerns and mandates a watershed-based approach that often encompasses multiple jurisdictions. The overall permit goals include (1) providing a consistent set of requirements for all co-permittees; and (2) allowing the co-permittees to focus their efforts and resources on achieving identified goals and improving water quality, rather than just completing individual actions (which may not adequately reflect identified goals). Under this approach, the co-permittees are tasked with prioritizing their individual water quality concerns, as well as providing implementation strategies and schedules to address those priorities. Municipal Permit conformance entails considerations such as receiving water limitations (e.g., Basin Plan criteria as outlined below), waste load allocations, and numeric water quality-based effluent limitations. Specific efforts to provide permit conformance and reduce runoff and pollutant discharges to the maximum extent practicable involve methods such as (1) using jurisdictional planning efforts (e.g., discretionary general plan approvals) to provide water quality protection; (2) requiring coordination between individual jurisdictions to provide watershed-based water quality protection; (3) implementing appropriate Best Management Practices (BMPs),

including Low Impact Design (LID) measures, to avoid, minimize, and/or mitigate effects such as increased erosion and off-site sediment transport (sedimentation), hydromodification1 and the discharge of pollutants in urban runoff; and (4) using appropriate monitoring/assessment, reporting, and enforcement efforts to ensure proper implementation, documentation, and (as appropriate) modification of permit requirements. The City has implemented regulations to ensure conformance with these requirements, as outlined below under local standards.

5.5.2.3 Local Regulations

Water Quality Control Plan for the San Diego Basin

The San Diego Basin encompasses approximately 3,900 square miles, including most of San Diego County and portions of southwestern Riverside and Orange counties. The basin is composed of 11 major HUs, 54 hydrologic areas or units, and 147 hydrologic subareas, extending from Laguna Beach southerly to the U.S./Mexico border. The San Diego RWQCB prepared the Basin Plan, which defines existing and potential beneficial uses and water quality objectives for coastal waters, groundwater, surface waters, imported surface waters, and reclaimed waters in the basin. Water quality objectives seek to protect the most sensitive of the beneficial uses designated for a specific water body.

National Pollutant Discharge Elimination System MS4 Permit

The San Diego RWQCB regulates discharges from Phase I municipal separate storm sewer systems (MS4s) in the San Diego Region under the Regional MS4 Permit. The Regional MS4 Permit covers 39 municipal, county government, and special district entities (referred to jointly as Copermittees) located in San Diego County, southern Orange County, and southwestern Riverside County who own and operate large municipal separate storm sewer systems (MS4s) which discharge storm water runoff and non-storm water runoff to surface waters throughout the San Diego Region. The Regional MS4 Permit No. CAS 0109266, Order No. R9-2013-0001, was adopted on May 8, 2013, and initially covered the San Diego County Co-permittees. Order No. R9-2015-0001 was adopted on February 11, 2015, amending the Regional MS4 Permit to extend coverage to the Orange County Co-permittees. Finally, Order No. R9-2015-0100 was adopted on November 18, 2015, amending the Regional MS4 Permit to extend coverage to the Riverside County Co-permittees. The Regional MS4 Permit expired on June 27, 2018, but remains in effect under an administrative extension until it is reissued by the San Diego Water Board.

City of San Diego Jurisdictional Urban Runoff Management Plan

The City's Jurisdictional Runoff Management Plan (JRMP) (City of San Diego 2023a) encompasses City-wide programs and activities designed to prevent and reduce storm water pollution within City boundaries. The JRMP is the City's approach to improving water quality in its rivers, bays, lakes, and ocean through reducing discharges of pollutants to the municipal separate storm sewer system. As the operator of a storm drain system, the City is subject to a NPDES Municipal Permit issued by the RWQCB, San Diego Region. The permit requires the City to reduce pollutants in discharges from its storm drain system to water bodies.

Storm Water Standards Manual

The City's Storm Water Standards Manual was developed to comply with NPDES permits administered by the State of California. To comply with permit requirements, the City is required to develop and implement storm water pollution controls for private and public development projects for both the construction and post-construction phases. Storm water pollution controls, in the form of both structural and non-structural BMPs, are designed to reduce pollutants discharged from project sites to the maximum extent practicable. The City has developed the Storm Water Standards in response to the NPDES permits, which is divided into the following three parts:

- Part 1, *BMP Design Manual for Permanent Site Design, Storm Water Treatment and Hydromodification Management*, complies with the Regional MS4 Permit regulating postconstruction storm water discharges onsite.
- Part 2, *Construction BMP Standards*, complies with the Regional MS4 Permit and the CGP regulating construction-phase storm water discharges.
- Part 3, *Offsite Storm Water Alternative Compliance Program for Water Quality and Hydromodification Control*, complies with the Regional MS4 Permit regulating post-construction storm water discharges offsite.

Grading Regulations

San Diego Municipal Code (SDMC) Section 142.0101 et seq., *Grading Regulations*, addresses slope stability, protection of property, erosion control, water quality, landform preservation, and paleontological resources preservation, and protection of the public health, safety, and welfare of persons, property, and the environment. Requirements related to water quality include implementation of temporary and permanent erosion, sedimentation, and water pollution control measures and shall include measures from those outlined in SDMC Chapter 14, Article 2, Division 2, Storm Water Runoff Control and Drainage Regulations.

City of San Diego General Plan

The City of San Diego General Plan provides goals and policies related to water quality in the Conservation Element (City of San Diego 2008). Water quality-related goals and policies applicable to the project are discussed in Section 5.1, *Land Use*, of this EIR.

La Jolla Community Plan and Local Coastal Program Land Use Plan

There are no applicable policies or plan recommendations in the La Jolla Community Plan and Local Coastal Program Land Use Plan specific to water quality.

5.5.3 Impact: Pollutant Discharges and Local and Regional Water Quality

Issue 1: Would the project result in an increase in pollutant discharge to receiving waters during or following construction, or discharge identified pollutants to an already impaired water body?

Issue 2: What short-term and long-term effects would the project have on local and regional water quality and what types of pre- and post-construction Best Management Practices (BMPs) would be incorporated into the project to preclude impacts to local and regional water quality?

5.5.3.1 Impact Thresholds

According to the City's Significance Determination Thresholds (2022), compliance with the Water Quality Standards is assured through permit conditions provided by Land Development Review (LDR) Engineering. Adherence to the City's Storm Water Standards is considered adequate to preclude surface water quality impacts.

5.5.3.2 Impact Analysis

Potential water quality impacts related to construction include erosion/sedimentation, the use and storage of construction-related hazardous materials (e.g., fuels, etc.), and generation of debris from demolition activities. Construction of the project would include demolition and removal of the existing residence, hardscape, and landscaping, followed by the construction of the new structure and associated improvements. These activities have the potential to generate water quality pollutants that could affect water quality. Pollutants associated with demolition and construction activities could include, but are not limited to, debris and trash, silt or soil, organic wastes, chemicals, fuel, and paint.

As discussed in Section 5.2, *Geologic Conditions*, the potential for soil erosion and the off-site transport of eroded material (sedimentation) would occur during demolition, site preparation, and construction, through activities such as the removal of vegetation, demolition of the existing structure and site improvements, and grading/excavation of the project site. Erosion and sedimentation can increase sediment volumes in surface water runoff, potentially resulting in water quality impacts to downstream receiving waters such as increased turbidity and the transport of contaminants that tend to adhere to sediment particles (with related effects to aquatic habitats and species). While graded, excavated, and filled areas associated with construction activities would be stabilized via compaction and installation of hardscape and landscaping, erosion potential and associated water quality impacts would be increased in the short-term during demolition, grading, and construction activities.

Project construction would involve the on-site use and/or storage of hazardous materials such as fuels, lubricants, solvents, concrete, and paint. The accidental discharge of such materials during construction could potentially result in significant impacts if these pollutants reach downstream receiving waters, particularly materials such as petroleum compounds that are potentially toxic to aquatic species in low concentrations.

Demolition activities associated with the project would generate construction debris, potentially including particulates, concrete, asphalt, metal, paint, insulation, and wood. The introduction of demolition-related debris into local drainages or storm drain systems could result in downstream water quality impacts.

Operational activities would have the potential to release contaminants into stormwater that are typical of urban development, as listed in Table 5.5-1. Prior to the issuance of any construction permits, the project applicant shall submit a Water Pollution Control Plan (WPCP), which would be prepared in accordance with the guidelines in Part 2, Construction BMPs Standards Chapter 4 of the City's Storm Water Standards Manual as a condition of the permit. A number of BMPs would be implemented by the project contractor to control erosion and provide protection of storm water flows on site during and after construction. Specifically, the proposed storm water BMPs include a combination of sedimentation basins, inlet filters, erosion control mats, mulching, straw/hay bales, berms, silt fences, dikes, biofilter/compost bags, vegetated buffer strips, hydroseeding with native plants, preventative maintenance (e.g., sediment basin inspection and repair), and good housekeeping practices (e.g., removal of sediment, particulates and trash from paved areas before it enters the drainage system). The project would be conditioned to comply with the City's Storm Water Standards Manual and Grading Regulations during and after construction, and appropriate BMPs would be utilized to ensure that water quality is not degraded. Implementation of project specific BMPs and compliance with federal, state, and local regulations related to water quality would preclude impacts associated with soil erosion and off-site transport of eroded material, on-site use and storage of hazardous materials during construction, and demolition and other construction debris, or following construction. Thus, the project would not result in an increase in pollutant discharge to receiving waters during or following construction, nor would it discharge identified pollutants to an already impaired water body. With implementation of the described BMPs and compliance with applicable regulations, the project would not result in local or regional water quality effects. Impacts would be less than significant.

5.5.3.3 Significance of Impact

The project would comply with applicable water quality requirements, including those of the City and RWQCB, and other applicable federal, state, and local regulations. Compliance with the water quality standards is ensured through permit conditions provided by LDR Engineering requiring the submittal of a Water Pollution Control Plan (WPCP) prepared in accordance with the guidelines in Part 2 Construction BMP Standards Chapter 4 of the City's Storm Water Standards. Impacts associated with pollutant discharge and local and regional water quality would be less than significant.

5.5.3.4 Mitigation Monitoring and Reporting

No mitigation measures are required.

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6. CUMULATIVE IMPACTS

CEQA Guidelines Section 15130 requires that an EIR address cumulative impacts of a project when its incremental effect would be cumulatively considerable. *Cumulatively considerable* means that the incremental effects of an individual project would be considerable when viewed in connection with the effects of past, current, or probable future projects.

According to CEQA Guidelines Section 15130, the discussion of cumulative effects "need not provide as great a detail as is provided of the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness." The evaluation of cumulative impacts is to be based on either: "(A) a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or (B) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative effect. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency."

The basis and geographic area for analyzing cumulative impacts depend on the nature of the issue and the project. In some cases, regional planning addresses cumulative impacts, while in other cases, the analysis considers more localized effects. For the 6110 Camino De La Costa Project, a planned approach is taken, given the built-out and developed nature of the La Jolla community.

Based on the analyses contained in Chapter 5, *Environmental Analysis*, the project's impacts on land use (policy inconsistency) and historical resources would be significant and unmitigated, while project impacts associated with geologic conditions, hydrology, and water quality would be less than significant. The following is a discussion of whether or not these direct impacts would contribute to cumulative impacts and if that contribution is cumulatively considerable.

6.1 Cumulative Effects Found to Be Significant

6.1.1 Land Use

The geographic scope for land use cumulative impacts is the City's General Plan area. Implementation of the 6110 Camino De La Costa Project would be generally consistent with the General Plan and community plan policies, with the exception of goals and policies related to historic preservation. The project would comply with the procedures established in the Historical Resources Regulations in the Land Development Code by obtaining approval of a site development permit prior to the demolition of the residence at Casa De Los Amigos, however, because demolition is not consistent with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, the project would be inconsistent with City goals and policies intended to protect and preserve historical resources. As noted under Section 6.1.2, *Historical Resources*, the cumulative loss of historical resources within San Diego through the redevelopment of older properties in the region would be significant and contrary to the intent of the General Plan policies. Therefore, the significant land use policy inconsistency associated with the project would contribute considerably to the cumulative land use policy impacts associated with the demolition of other historical resources

anticipated during build out of the City, despite the implementation of treatment mitigation on a project-by-project basis. Cumulatively significant land use policy impacts are identified.

As discussed in Section 5.1, *Land Use*, the project would not result in impacts associated with the MSCP, would not contribute to the physical division of the community, and would not result in land uses which are incompatible with an adopted Airport Land Use Compatibility Plan. Thus, the project would not contribute to cumulative impacts associated with these topics.

6.1.2 Historical Resources

The geographic scope for historical resources cumulative impacts is the City of San Diego. The 6110 Camino De La Costa Project would redevelop the project site and would result in the demolition of an existing historically designated (San Diego Historic Resource Site No. 1481) one to two-story residence with below-grade basement and the construction of a new, two-story residence with a single subterranean level (i.e., basement) for a total of three levels. In January 2023, the property was designated locally as City of San Diego Historic Site #1481 under Criterion A, B, C and D. Casa De Los Amigos is eligible for listing in the CRHR under Criterion 1 (significant events), Criterion 2 (significant person), and Criterion 3 (architecture), but does not merit listing on the National Register of Historic Places because it lacks integrity of setting, as noted in Section 5.3, *Historical Resources*. The proposed demolition of the residence would result in a significant impact to a locally designated and CRHR eligible historical resource, which would not be mitigated to less than significant levels by measures outlined in this EIR. Demolition of the residence at Casa De Los Amigos would incrementally contribute to the continuing loss of significant historical resources throughout the La Jolla Community, the City of San Diego, and the San Diego region as a result of redevelopment and development proposals. This cumulative loss of historical resources within the region is identified as significant and unavoidable in the City General Plan EIR (City of San Diego 2008d), and the project's contribution would be cumulatively considerable.

As discussed in Section 5.3, *Historical Resources*, the project is not expected to result in direct impacts to subsurface archaeological resources, including religious or sacred uses, or human remains. Other projects occurring as a result of General Plan buildout would be required to adhere to State and local regulations regarding the recovery and curation of subsurface historical resources and to regulations related to the discovery of human remains. The City's General Plan EIR indicates that implementation of General Plan policies and compliance with federal, state, and local regulations would preclude impacts to archaeological resources and prehistoric human remains; however, adherence to regulations may not adequately avoid or reduce impacts, and mitigation may be required. The General Plan EIR identifies a cumulatively significant and unavoidable impact associated with archaeological resources and prehistoric human remains due to the unknown nature or the degree of impacts for development under the General Plan and the applicability, feasibility and success of future mitigation measures. Therefore, the General Plan EIR identifies cumulative impacts to historic resources (including archaeological resources and prehistoric human remains) as significant and unavoidable. As the project is not expected to result in direct impacts to subsurface archaeological resources or human remains, it would not contribute to the General Plan's significant cumulative impact.

6.2 Effects Found to Be Not Cumulatively Considerable

6.2.1 Geologic Conditions

Geologic conditions are site-specific, but also include larger-scale elements, such as faults and underlying bedrock. However, potential geologic or soil hazards resulting from development are generally localized to the location of development and immediately surrounding lands. There is typically little, if any, cumulative relationship with regards to geologic conditions between the development of an individual project and development within a larger area, such as the City's General Plan area. For this reason, potential cumulative impacts resulting from seismic and geologic hazards would be minimized on a site-by-site basis through the use of standard construction methods and adherence to construction and building code requirements. The specific geologic condition of each individual development site, soil type and soil characteristics, and project excavation and soil movement requirements would dictate the potential specific geologic risks at each location.

As discussed in Section 5.2, *Geologic Conditions*, site-specific geologic impacts would be avoided or reduced below a level of significance through adherence to the recommendations in the project's geotechnical study, and through compliance with the California Building Code and City requirements. With the exception of erosion, because geologic impacts are specific to a site's geologic condition, potential geologic impacts are restricted to the area proposed for development and would not contribute to cumulative impacts associated with planned or proposed development. With regards to erosion, as discussed in Section 5.2, the project would not create or contribute significantly to erosion. The project and cumulative development would be required to adhere to applicable federal, State, and local regulatory standards related to erosion and sedimentation, including applicable NPDES and related City regulations. The project and other cumulative development would be required to implement best management practices (BMP)s pursuant to the City Storm Water Standards and Grading Ordinance. Compliance with mandatory regulatory requirements would ensure that the project, and cumulative development under the City's General Plan, would not have a significant cumulative impact related to erosion.

As discussed in the City's General Plan EIR (City of San Diego 2008e) implementation of General Plan policies and compliance with federal, state, and local regulations would preclude incremental exposure to seismic and geologic hazards for development occurring under the General Plan; however, for some projects, it is possible that adherence to regulation may not adequately avoid or reduce incremental impacts. In these cases, mitigation measures would be required to reduce impacts to a less-than-significant level; however, if no feasible mitigation exists in these cases, a significant and unavoidable impact may occur. The General Plan EIR identifies a cumulatively significant and unavoidable impact associated with geologic conditions due to the unknown nature or the degree of future geologic impacts for development under the General Plan and the applicability, feasibility and success of future mitigation measures. Because the project would comply with the recommendations of the project's geotechnical study and would be constructed in accordance with the requirements of the California Building Code, City requirements, and regulatory standards related to erosion and sedimentation, the project would result in less-than-significant impacts, and would not contribute to the significant cumulative impacts identified in the City's General Plan EIR for General Plan buildout.

6.2.2 Hydrology

The geographic scope for hydrology cumulative impacts is the Peñasquitos watershed. Lands and bodies within the watershed are part of an interrelated hydrologic system. Such that modifications to a portion of a watershed or water pollution produced by development in one location may result in hydrology and water quality impacts that affect other water bodies in the watershed.

As discussed in Section 5.4, *Hydrology*, existing site drainage has uncontrolled flow across the site to the Pacific Ocean. The project would be designed to drain into a sump basin and would be pumped via an under-sidewalk drain to the Camino De La Costa public street right-of-way. While a small portion of the project site, the coastal bluffs, is within a FEMA Special Flood Hazard area, the portion of the project site where project activities would occur is not within the 100-year flood plain. Thus, no impacts related to flooding would occur. As described in Section 5.4, *Hydrology*, of this EIR, implementation of the project would require conformance with federal, State, and local regulations related to hydrology and drainage.

Cumulative development under General Plan buildout would also be required to comply with regulatory requirements related to hydrology and drainage and would be required to prepare hydrologic and hydraulic calculations, subject to review and approval by the City, to demonstrate compliance with requirements. The City's General Plan EIR indicates that compliance with General Plan policies and compliance with federal, State, and local regulations would preclude hydrological impacts; however, it is possible that compliance with these requirements may not adequately avoid or reduce incremental impacts, and such projects would require mitigation measures to reduce hydrology impacts. If no feasible mitigation exists in these cases, a significant and unavoidable impact may occur. The General Plan EIR identifies a cumulatively significant and unavoidable impact associated with hydrology due to the unknown nature or the degree of future hydrology impacts for development under the General Plan and the applicability, feasibility, and success of future mitigation measures. As the project would be required to comply with regulatory requirements related to hydrology and drainage, the project would not contribute to a cumulatively significant hydrology impact.

6.2.3 Water Quality

Development of the project and the construction of cumulative development under the General Plan would have the potential to contribute to water quality impacts, including erosion and siltation, in the Peñasquitos watershed. According to the City's Significance Determination Thresholds (2022), compliance with the City's Water Quality Standards is assured through permit conditions, and adherence to the City's Stormwater Standards is considered to preclude water quality impacts. As such, conformance with the City storm water standards would preclude potential water quality impacts from occurring. As discussed in Section 5.5, *Water Quality*, the project would implement various construction and post-construction BMPs developed through preparation of a Water Pollution Control Plan (WPCP) (implemented during construction), and compliance with applicable water quality requirements, including those of the City and RWQCB, and other applicable federal, State, and local regulations. Compliance with applicable regulations would preclude potentially significant water quality impacts from occurring to receiving waters as a result of the project. Cumulative development under General Plan buildout would also be required to demonstrate compliance with state and local water quality regulations. If projects are not compliant, mitigation

measures would be required in order to ensure water quality impacts do not occur. As discussed in the City's General Plan EIR, due to the unknown nature or the degree of future hydrology impacts for development under the General Plan and the applicability, feasibility and success of future mitigation measures, which cannot be adequately known for each specific future project, the General Plan EIR identifies a significant and unavoidable cumulative water quality impact. However, as discussed in Section 5.5, the project would conform to regulatory requirements related to water quality and would implement BMPs to ensure the project would not result in water quality impacts. As such, the project would not contribute to the cumulatively significant water quality impact identified in the General Plan EIR.

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7. OTHER CEQA SECTIONS

7.1 Effects Found Not to Be Significant

California Environmental Quality Act (CEQA) Guidelines Section 15128 requires an EIR to contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were, therefore, not discussed in detail in the EIR. Based upon initial environmental review, the City has determined that the project would not have the potential to cause significant impacts associated with the following 16 issue areas:

- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Energy
- Greenhouse Gas Emissions
- Health and Safety
- Mineral Resources
- Noise
- Paleontological Resources
- Population and Housing
- Public Services and Facilities
- Transportation and Circulation
- Tribal Cultural Resources
- Utilities and Service Systems
- Visual Effects/Neighborhood Character
- Wildfire

7.1.1 Agriculture and Forestry Resources

The City Significance Determination Thresholds (2022) state that a significant impact on agricultural resources may result from a project that involves the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use.

The project site is currently a developed site that contains a single-family residence. The project site is designated by the California Department of Conservation as “Urban Built-Up Lands” (California Department of Conservation 2023) and does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance. No active agricultural activities, Williamson Act contract lands, or designated agricultural preserves are located adjacent to or in the vicinity of the project site. Additionally, the project site is located within an area that does not support timber growth. Therefore, implementation of the project would not impact agricultural or forestry resources.

7.1.2 Air Quality

The San Diego Air Pollution Control District (SDAPCD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the San Diego Air Basin (SDAB) is in nonattainment. Strategies to achieve these emissions reductions are developed in the Regional Air Quality Strategy (RAQS) and State Implementation Plan (SIP), prepared by SDAPCD for the region. Both the RAQS and SIP are based on SANDAG population projections, as well as land use designations and population projections included in general plans for those communities located within the county. Population growth is typically associated with the construction of residential units or large employment centers.

A project would be inconsistent with the RAQS/SIP if it results in population and/or employment growth that exceed growth estimates for the area. If a project proposes development that is less dense than anticipated within the General Plan, the project would likewise be consistent with the RAQS. If a project proposes development that is greater than that anticipated in the City General Plan and SANDAG's growth projections upon which the RAQS is based, the project could conflict with the RAQS and SIP, and may have a potentially significant impact on air quality. This situation would warrant further analysis to determine if a project and the surrounding projects exceed the growth projections used in the RAQS for the specific subregional area.

The City of San Diego Significance Determination Thresholds (2022) has adopted emission thresholds based on the thresholds for an Air Quality Impact Assessment in the SDAPCD's Rule 20.2. These thresholds are shown in **Table 7-1**, *Significance Criteria for Air Quality Impacts*.

Table 7-1
SIGNIFICANCE CRITERIA FOR AIR QUALITY IMPACTS

Pollutant	Emission Rate		
	lbs/Hr	lbs/Day	Tons/Year
Carbon Monoxide (CO)	100	550	100
Oxides of Nitrogen (NO_X)	25	250	40
Respirable Particulate Matter (PM10)	—	100	15
Oxides of Sulfur (SO_X)	25	250	40
Lead and Lead Compounds	—	3.2	0.6
Fine Particulate Matter (PM2.5)	—	—	—
Volatile Organic Compounds (VOCs)	—	137	15

Source: City of San Diego 2022.

In addition to impacts from criteria pollutants, project impacts may include emissions of pollutants identified by the State and federal government as toxic air contaminants (TACs) or hazardous air pollutants (HAPs). If a project has the potential to result in emissions of any TAC or HAP that may expose sensitive receptors to substantial pollutant concentrations, the project would be deemed to have a potentially significant impact. With regard to evaluating whether a project would have a significant impact on sensitive receptors, air quality regulators typically define sensitive receptors as schools (i.e., preschool to 12th grade), hospitals, resident care facilities, daycare centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality.

With regard to odor impacts, a project that proposes a use that produces objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of off-site receptors. The impacts associated with construction and operation of the project were evaluated for significance based on these significance criteria.

7.1.2.1 Consistency with Regional Air Quality Strategy

The project would demolish an existing single-family residential unit and construct a new single-family residence in its place. As discussed in Section 5.1, *Land Use*, the RS-1-5 Zone permits a maximum density of 1 dwelling unit (DU) for each 8,000 square feet (SF) of lot area and designated as Low Density Residential (5-9 du/ac) within the La Jolla Community Plan area. The project would be consistent with the existing zoning and land use designation for the site; therefore, the emissions associated with the project are anticipated in the SIP and RAQS. Because the proposed land use is included in local air quality plans, the project would be consistent at a sub-regional level with the underlying growth forecasts in the RAQS and would not obstruct implementation of the RAQS. As such, no impact would result.

7.1.2.2 Violation of an Air Quality Standard

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related air emissions include fugitive dust from grading activities; construction equipment exhaust; construction-related trips by workers, delivery trucks, and material-hauling trucks; and construction-related power consumption. Construction of the project would include demolition of the existing structure on site and excavation of the site to prepare the building pad and remove the existing basement, and construction of a new single-family residence. Variables that factor into the total construction emissions potentially generated include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on or off site. The amount of construction emissions associated with the proposed project would be minimal and temporary in nature.

Long-term air emission impacts are those associated with stationary sources and mobile sources related to any change caused by a project. Operation of a single-family residence (in exchange for the existing smaller single-family residence) would produce minimal new stationary source emissions given its adherence to the California Building Code (CBC) which has energy efficiency and water conservation standards that did not exist when the original home was constructed in 1924. The project is consistent with the site's designated use and underlying residential zoning and is compatible with surrounding residential development. Based on the residential land use and the fact that it involves the replacement of an existing single-family residence, any net increase in emissions over the long-term would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Therefore, construction and operation of the project would not have the potential to exceed the SDAPCD regional emission thresholds for daily emissions. In addition, the project would not violate an air quality standard or contribute to an existing or projected violation, result in a cumulatively considerable increase in ozone or particulate matter emissions, or expose receptors to substantial pollutant concentrations.

7.1.2.3 Cumulatively Considerable Increase

The nonattainment status of regional pollutants is a result of past and present development within the SDAB, and this regional impact is cumulative rather than attributable to any one source. A

project's emissions may be individually limited, but cumulatively considerable when taken in combination with past, present, and future development projects. The thresholds of significance are relevant to whether a project's individual emissions would result in a cumulatively considerable incremental contribution to the existing cumulative air quality conditions. If a project's emissions would be less than those threshold levels, the project would not be expected to result in a considerable incremental contribution to the significant cumulative impact.

As discussed above, the project would not change the on-site residential land use or result in the generation of criteria air pollutant emissions that would have the potential to exceed the SDAPCD thresholds for construction and operational activities; therefore, it would not contribute a considerable amount of criteria air pollutant emissions to the region's emissions profile or not impede attainment and maintenance of ambient air quality standards.

7.1.2.4 Odors

The project may temporarily produce odors during construction activities resulting from construction equipment exhaust, application of asphalt, and/or the application of architectural coatings; however, standard construction practices would minimize the odor emissions and their associated impacts. Furthermore, odors emitted during construction would be temporary, short-term, and intermittent in nature, and would cease upon the completion of the respective phase of construction. As a single-family residence, no operational odor sources are proposed. Accordingly, the project would not create objectionable odors affecting a substantial number of people during construction, and short-term impacts would be less than significant. No impact would occur over long-term operation of the project.

7.1.3 Biological Resources

Based on the City Significance Determination Thresholds (2022), significant impacts to biological resources are evaluated in several different ways in accordance with the City's Biology Guidelines (2012) and San Diego Municipal Code (SDMC) pertaining to Environmentally Sensitive Lands (ESL) Regulations. Specifically:

- The City's permit to "take" covered species under the Multiple Species Conservation Program (MSCP) is based on the concept that 90% of lands within the Multi-Habitat Planning Area (MHPA) will be preserved. Therefore, any encroachment into the MHPA (in excess of the allowable encroachment by a project) is considered a significant impact and requires that land be added to the MHPA that is at least equivalent to what would be removed.
- Lands containing Tiers I, II, IIIA, and IIIB habitats and all wetlands are considered sensitive, and declining habitats and impacts to these resources may be considered significant. (Lands designated as Tier IV are not considered to have significant habitat value and impacts would not be considered significant.)
- Impacts to individual sensitive species, outside of any impacts to habitat, may also be considered significant based upon the rarity and extent of impacts.
- Result in a substantial adverse impact on wetlands (including but not limited to marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means.

- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites.
- Conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State HCP, either within the MSCP plan area or in the surrounding region.
- Introduce land uses within an area adjacent to the MHPA that would result in adverse edge effects.
- Conflict with any local policies or ordinances protecting biological resources.
- Introduce invasive species of plants into a natural open space area.

The project site is entirely developed and surrounded by urban development and infrastructure, such as major roads, which are considered Tier IV habitat. Vegetation on the site consists of ornamental landscaping (refer to Figures 2-6a through 2-6h, *Site Photographs*). As such, the project site does not support any vegetation communities considered sensitive biological resources under the City's ESL Regulations. The project site contains sensitive coastal bluffs, which are considered ESL. However, the project would not impact any sensitive biological resources on the bluff. All existing structures on the bluff will be removed, and it will be protected by a COE.

The project is not used as a wildlife corridor and would not interfere with the movement of any resident or migratory fish or wildlife species, or diminish habitat for fish, wildlife, or plants. The project would not impact any state or federally endangered, threatened, or rare species, or listed species habitats. The project site is within the Urban Areas of the City's MSCP Subarea Plan and is located outside the MHPA (City of San Diego 1997). No MHPA exists in the project vicinity. The site does not support any covered vegetation communities or covered species. Therefore, the project would not conflict with any policies protecting biological resources and no direct or indirect impacts would occur.

7.1.4 Energy

7.1.4.1 Energy Usage

Construction. Any temporary electrical power for lighting and electronic equipment would be provided by San Diego Gas & Electric (SDG&E). The amount of electricity used during construction would be minimal because typical demand stems from the use of construction trailers that are used by managerial staff during the hours of construction activities in addition to electrically powered hand tools. No such activities are anticipated during project construction.

Most energy used during the project's construction phase would be from petroleum sources. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction, while transportation of construction materials and construction worker commutes would also result in petroleum consumption. Heavy-duty equipment used for project construction would rely on diesel fuel, as would haul trucks involved in off-hauling materials from demolition and excavation. In contrast, construction workers would travel to and from the project site in gasoline-powered passenger vehicles. There would be no unusual project characteristics or construction processes that would require the use of equipment that would be more energy

intensive than is used for comparable activities or use of equipment that would not conform to current emissions standards (and related fuel efficiencies).

Both types of energy used during construction of the project would be limited to the 18-month construction period and would not involve long-term electrical or petroleum use. As such, energy consumption during construction activities would not be considered excessive, inefficient, or unnecessary.

Operations. The expected energy consumption during operation of the project would be consistent with typical usage rates for residential uses. While the project would result in the removal of an existing residence and replacement with a new residence, the proposed residence is larger in size than the existing structure. Thus, it may result in a slight increase in energy usage based on the increase in size; however, the project would comply with the latest Title 24 and CALGreen Code standards which would improve energy efficiency over the energy demand of the existing structure which was built before such standards were in place. Additionally, a larger residence that is replacing an existing, less-efficient residence would not result in a substantial increase in energy. The project would also feature a solar energy system sized to provide alternative energy on site that meets 50 percent of the new residence's demand for electricity. Therefore, the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during project operation. The project would not result in the need for new energy delivery systems, or require substantial alterations to existing utilities. In addition, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Operation of the project would not result in the use of excessive amounts of electricity, natural gas or petroleum and would not result in the need to develop additional sources of energy.

7.1.4.2 Energy Efficiency Policy Compliance

The federal, state, and local regulatory plans and policies aim to reduce energy demand, impose emission caps on energy providers, establish minimum building energy and green building standards, transition to renewable non-fossil fuels, incentivize homeowners and builders, fully recover landfill gas for energy, and expand research and development. In accordance with California Air Resources Board's (CARB's) Scoping Plan, the project includes sustainable building practices, such as cool/green roofs and the use of low-flow fixtures/appliances and low-flow irrigation.

The project would be required to include all mandatory green building measures under the California Green Building Standards (CALGreen) Code, and as specified in the CAP Consistency Checklist prepared for the project (refer to **Appendix E**, *Climate Action Plan Consistency Checklist*, to this EIR). Therefore, the project would be consistent with the CARB Scoping Plan measures through incorporation of stricter building and appliance standards. The project is consistent with the CAP as demonstrated in the project's CAP Consistently Checklist (JMAN Investments, Inc. 2023). Each of the applicable CAP strategies would be implemented by the project, including sustainable development features and green building practices. Thus, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No significant adverse environmental effects would result from the adoption of the project in terms of plan consistency or policy conflicts.

7.1.5 Greenhouse Gas Emissions

According to the California Natural Resources Agency, "due to the global nature of greenhouse gas (GHG) emissions and their potential effects, GHG emissions will typically be addressed in a cumulative impacts analysis." According to CEQA Guidelines Appendix G, the following criteria may be considered to establish the significance of global climate change if the project would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Conflict with the City's Climate Action Plan or an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

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

(1) Use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use. The lead agency has discretion to select the model or methodology it considers most appropriate, provided it supports its decision with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use; and/or

(2) Rely on a qualitative analysis or performance-based standards.

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

(1) The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;

(2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

(3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

In December 2015, the City adopted a CAP that outlines the actions that the City will undertake to achieve its proportional share of state GHG emission reductions. The CAP is a qualified plan for the reduction of GHG emissions, in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP. In July 2016, the City adopted the CAP Consistency Checklist to provide a streamlined review process for the analysis of potential GHG impacts from proposed new development; checklist revisions were then implemented in July 2017.

In 2022, the City adopted a CAP Update that set a goal of achieving net zero GHG emissions by 2035 with updated strategies, measures, and actions. This update centers on climate equity through robust community engagement and pushes for bold action to mitigate the effects of climate change beyond the previously adopted 2015 CAP. The 2022 CAP Update amended Sections 126.0402 and 126.0404 of the Land Development Code (LDC) of the SDMC to add draft Climate Action Plan Consistency Regulations (CAP Consistency Regulations) as part of the implementation measures for the CAP Update. The CAP Consistency Regulations have replaced the CAP Consistency Checklist adopted in 2016 as the list of measures that can be implemented on a project-by-project basis to ensure that new development is consistent with the CAP Update. The CAP Consistency regulations were approved and became effective in the Coastal zone on June 8, 2023. However, the City included provisions in the 2022 CAP that exempted certain in-process projects from the 2022 CAP Consistency Regulations, allowing such projects to rely on the CAP Consistency Checklist. This project qualified under the provisions of the 2022 CAP as an in-process project that is exempt from the 2022 CAP Consistency Regulations. Therefore, a CAP Consistency Checklist was completed for the project to demonstrate consistency with the City's GHG CEQA thresholds that the project would not generate GHG emissions, either directly or indirectly that may have a significant impact on the environment, and that the project would be consistent with the City's CAP. However, it should be noted that the project would also be consistent with the new CAP Regulations. As a single-family residence, the project would not be required to implement any of the improvements included in Section §143.14 of the City's Municipal Code.

The CAP Consistency Checklist is used to demonstrate compliance with the CAP for the project and requires a three-step review of the project to determine consistency with the GHG projections and programs outlined in the City's CAP Update. For the applicable steps, the project has been found to be consistent with the CAP (JMAN Investments, Inc. 2023). The following summarizes that determination based on the various items included in the project's CAP Consistency Checklist (Appendix E to this EIR).

With regard to Step 1 of the CAP Consistency Checklist, the project would be considered consistent with existing General Plan and community plan land use and zoning designations, as discussed in Section 5.1, *Land Use*. The project site is located within the RS-1-5 Zone and conforms to all the requirements of the RS-1-5 zone, the La Jolla Community Plan, and the Local Coastal Program Land Use Plan. With regard to Step 2 of the CAP Consistency Checklist, the project design would comply with the GHG reduction strategies in the CAP by featuring the use of low-flow fixtures and appliances and the use of solar power for electricity. A Step 3 conformance evaluation is not required because the project does not require a land use amendment within a transit priority area and Step 1 demonstrates the project would be consistent with the General Plan and the La Jolla Community Plan and Local Coastal Program Land Use Plan.

Therefore, the project would not conflict with the City's CAP or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of GHGs. The project would not result in a significant impact relative to plans, policies, or regulations aimed at reducing GHG emissions. Impacts would, therefore, be less than significant.

7.1.6 Health and Safety

The City Significance Determination Thresholds (2022) require that the environmental review process include steps to disclose and address the safe removal, disposal, and/or remediation of hazardous materials in conformance with applicable federal, state, and local government standards. The City Significance Determination Thresholds also identify potential public safety/public health issues associated with projects that are: (1) located within and/or in close proximity to airports, flood-prone areas, or areas susceptible to brush fires; (2) susceptible to disease-carrying vector exposure, sewage spills, or electromagnetic field effects associated with electric transmission lines and communications facilities; and (3) in proximity to former or active underground storage tank sites, fuel-storage tank farms, sewage treatment plants, or areas where toxic chemicals may be stored.

7.1.6.1 Hazardous Materials Usage and Transport

Construction. A variety of hazardous substances and wastes would be stored, used, and generated on the site during construction. These would include fuels for machinery and vehicles, new and used motor oils, cleaning solvents, paints, and storage containers and applicators containing such materials. Accidental spills, leaks, fires, explosions, or pressure releases involving hazardous materials represent a potential threat to human health and the environment if not properly treated. Accident prevention and containment are the responsibility of the construction contractors, and provisions to properly manage hazardous substances and wastes are typically included in construction specifications. The contractor would be required to comply with applicable local, state, and federal regulations, regarding the use, storage, and disposal of hazardous materials and hazardous wastes. In addition, because of the age of the on-site structures, asbestos-containing material (ACM) and lead-based paint (LBP) should be evaluated prior to razing of the existing residence. Prior to construction, surveys for ACM and LBP would be conducted by California Department of Public Health–certified lead inspector/assessors, California Division of Occupational Safety and Health Certified Asbestos Consultants, and/or professionals appropriately qualified in their field in accordance with applicable local, state, and federal guidelines and regulations. If present, removal and disposal of such materials would be conducted in accordance with applicable regulations. Therefore, adherence to the construction specifications and applicable regulations regarding hazardous materials and hazardous waste, including disposal, would ensure that construction of the project would not create a significant hazard to the public or the environment.

Hazardous materials would not be disposed of or released onto the ground, the underlying groundwater, or any surface water. Totally enclosed containment would be provided for all refuse. With implementation of these construction BMPs, potential impacts from the accidental release of hazardous materials during construction activities would not occur.

Operation. Operation of the project may include the use of small amounts of various hazardous materials (e.g., chemical reagents, solvents, fuels, paints, and cleansers) typical of residential uses. These materials would be considered household hazardous wastes, common wastes, and/or universal wastes by the U.S. Environmental Protection Agency, which regards these types of wastes to be common to businesses and households and to pose a lower risk to people and the environment than other hazardous wastes when they are properly stored, transported, used, and disposed of. All hazardous materials generated, used, and stored on the project property would be managed in accordance with all relevant federal, state, and local laws, including the California

Hazardous Waste Control Law (California Health and Safety Code Division 20, Chapter 6.5), Hazardous Waste Control Regulations (22 CCR 4.5), and the Medical Waste Management Act (California Health and Safety Code, Division 104, Part 14).

7.1.6.2 Hazardous Emissions

Given the residential character of the project, operations would not create any sources of hazardous emissions that could affect the public. The closest schools to the project site are La Jolla United Methodist Church Nursery School, located approximately 0.25 mile to the east, and Bird Rock Elementary School, located approximately 1 mile to the southeast. While the project site is located within 0.25 mile of an existing or proposed school, the project would not emit any hazardous substances. Therefore, no hazardous emissions impact related to the project's proximity to schools would occur.

7.1.6.3 Listed Hazardous Materials Sites

Based on review of the online GeoTracker (California State Water Resources Control Board 2023) and EnviroStor (California Department of Toxic Substances Control 2023) databases, there are no existing hazardous materials sites on the project site or within 1,000 feet of the project site. As such, the project would not result in impacts associated with the disturbance of listed hazardous materials sites.

7.1.6.4 Emergency Evacuation Plans

The City of San Diego participates in the San Diego County Multi-Jurisdictional Hazard Mitigation Plan (County of San Diego 2023). The County of San Diego Operational Area Emergency Operations Plan (OAEOP; Unified San Diego County Emergency Services and County of San Diego 2022) is written in coordination with the Multi-Jurisdictional Hazard Mitigation Plan and describes how emergency personnel will cooperate, decide, and implement responses to a disaster that requires an evacuation of people and their pets. As identified in the OAEOP, ground transportation routes are the primary means of evacuation, and the public roadway network will be used as primary, alternative, contingency, and emergency evacuation routes during an evacuation effort. Primary evacuation routes within the County include major freeways (I-5, I-15, I-8, I-805) and major State Routes (County of San Diego 2011a). The nearest identified route to the project site is I-5, located approximately 2.6 miles to the east. No changes to local roads are proposed as part of the project and the project would not result in changes that would affect any primary evacuation routes. Therefore, the project would not interfere with or impair the implementation of an adopted emergency response or evacuation plan.

7.1.6.5 Wildfire Hazard

The project site is located in an urbanized area that does not interface with any wildlands (refer to Figure 2-2-, *Project Location and Vicinity*). According to the City of San Diego Very High Fire Hazard Severity Zone (VHFHSZ) Map, the project site is not located within a VHFHSZ (City of San Diego 2023b). As part of standard development procedures, the proposed development plans would be submitted to the City for review and approval to ensure that adequate emergency access is provided to and from the project site; however, a brush management plan would not be required because of

the distance to wildlands. Therefore, the project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

7.1.6.6 Airport Safety Hazards

The San Diego International Airport is located approximately 7.5 miles southeast of the project site, Montgomery Field Airport is located approximately 8 miles east of the site, and Marine Corps Air Station Miramar is located approximately 7 miles northeast of the project site. The project site is outside of the Airport Influence Areas for San Diego International and Montgomery Field airports and for Marine Corps Air Station Miramar (County of San Diego 2014, County of San Diego 2010, and County of San Diego 2011b). Lastly, the project site is not located within the vicinity of a private airstrip, public air strip, or heliport facility. Therefore, the project would not result in safety hazards for people residing or working in the project area.

7.1.7 Mineral Resources

The City Significance Determination Thresholds (2022) indicate that a project could cause a potentially significant impact to mineral resources if it results in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. An impact could also result from the loss of availability of a locally important mineral resource recovery site as identified in a general plan, specific plan, or other land use plan. According to the Generalized Mineral Land Classification figure (Figure CE-6) in the Conservation Element of the City General Plan, the project site and adjacent areas are designated as Mineral Resource Zone (MRZ-) 3 (City of San Diego 2008b). MRZ-3 areas contain mineral deposits, the significance of which cannot be evaluated from available data.

The project site has not been delineated on a local general, specific, or other land use plan as a locally important mineral resource recovery site, and no such resources would be affected with project implementation. Therefore, no impacts are identified. In addition, the project site is developed with a residential structure in an urbanized area, designated for low-density residential uses in the La Jolla Community Plan, and is zoned to accommodate single unit residential uses. As such, no impacts to mineral resources would occur.

7.1.8 Noise

According to the City's Significance Determination Thresholds (2022), a project would result in a significant noise impact:

- If it would result in temporary construction noise that exceeds 75 dBA Leq (12-hour) at the property line of a residentially zoned property from 7 a.m. to 7 p.m. (as identified in SDMC Section 59.0404) or if non-emergency construction occurs during the 12-hour period from 7 a.m. to 7 p.m., Monday through Saturday. Additionally, where temporary construction noise would substantially interfere with normal business communication, or affect sensitive receptors such as daycare facilities, a significant noise impact may be identified;
- If it would result in or create a significant permanent increase in the existing noise levels. If the ambient noise level already exceeds the noted threshold, then a project contribution of 3 dBA CNEL or greater would constitute a direct significant impact; and/or

- If it would result in the generation of noise levels at a common property line that exceeds the limits established in SDMC Section 59.5.0401. If a non-residential use, such as a commercial, industrial, or school use, is proposed to abut an existing residential use, the decibel level at the property line should be the arithmetic mean of the decibel levels allowed for each use as set forth in SDMC Section 59.5.0401(b).

7.1.8.1 Ambient Noise Levels

Short-term noise increases would be associated with on-site demolition, grading, excavation, and construction activities of the project. Construction-related short-term noise levels would be higher than existing ambient noise levels in the project area but would cease once construction is completed. Sensitive receptors (e.g., residential uses) occur in the immediate area of the project site, including directly adjacent on both sides of the property, and may be temporarily affected by construction noise. However, all construction activities would be required to comply with the construction hours and noise limits specified in the City's Municipal Code (Section 59.5.0404, Construction Noise) which are intended to reduce potential adverse effects resulting from construction noise on nearby sensitive land uses. Impacts would be less than significant.

For the long-term, typical noise levels associated with a single-family residence are anticipated, and the project would not result in an increase in the existing ambient noise levels from levels that already occur in association with the existing residence. The project would not result in noise levels in excess of standards established in the City of San Diego General Plan or Noise Ordinance. Impacts would be less than significant.

7.1.8.2 Vibration

Construction on the project would have the potential to result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. Groundborne vibration generated by heavy-duty equipment would be temporary in nature and would not generate an excessive amount of ground borne vibration or noise because no pile driving would be required to construct the residence. Once construction is complete, occupancy of the new residence would also not include the operation of any stationary equipment that would result in excessive groundborne vibration levels. A less-than-significant impact would occur.

7.1.8.3 Airport Noise

The project site is not located within an airport land use plan. The project site is also not located within two miles of a public airport or public use airport. No impact associated with airport noise would result.

7.1.9 Paleontological Resources

Based on the described City Significance Determination Thresholds (2022), impacts related to paleontological resources would be significant if a project would require excavation exceeding:

- Over 1,000 cubic yards (CY) of excavation extending to a depth of 10 feet or greater in a high-resource-potential geologic deposit/formation/rock unit; or
- Over 2,000 CY of excavation extending to a depth of 10 feet or greater in a moderate-resource-potential geologic deposit/formation/rock unit.

According to the geotechnical investigation prepared by Christian Wheeler Engineering (2022), the project site is underlain by artificial fill soils, Quaternary-age old paralic deposits, and Cretaceous-age sedimentary deposits of the Point Loma Formation.

There is no potential for paleontological impacts when grading in fill material (City of San Diego 2007). Quaternary-age old paralic deposits are broadly correlative with Bay Point Formation. The Bay Point Formation is a near shore marine sedimentary deposit that is about 220,000 years old. This formation has produced a large and diverse amount of well-preserved marine invertebrate and vertebrate fossils (City of San Diego 2007). The Bay Point Formation is considered to have "high" paleontological resource sensitivity in all communities where this unit occurs.

The Point Loma Formation was deposited on an ancient sea floor. Well-preserved remains of many types of fossil marine invertebrates are known from this formation. The formation has also produced sparse remains of terrestrial plants and dinosaurs. The Point Loma Formation has produced diverse and well-preserved assemblages of marine invertebrate fossils, as well as rare dinosaur remains (City of San Diego 2007). The Point Loma Formation is considered to have "high" paleontological resource sensitivity in all communities where this unit occurs.

As described in Section 3.3.2, *Earthwork*, site grading would require 150 CY of native soil excavation, 1,005 CY of artificial fill removal, and 20 CY of fill placement. The maximum depth of cut would be 12 feet, and the maximum fill depth would be 3 feet. While the project site is underlain by formational materials with a high paleontological sensitivity rating, grading excavation would extend beyond a depth of 10 feet but would be limited in quantity in native soils (150 CY) (Christian Wheeler Engineering 2022). Therefore, proposed excavation would not exceed the 1,000 CY threshold established in the City's Significance Determination Thresholds for high-resource potential geologic formations and project grading activities would not have the potential to result in significant impacts to paleontological resources. Potential impacts to paleontological resources would be less than significant, and construction monitoring would not be required.

7.1.10 Population and Housing

The City has not adopted specific significance thresholds for addressing a project's population and housing impacts. However, CEQA Guidelines Appendix G indicates a project could have a significant impact on population and housing if it would:

- Induce substantial unplanned population growth in an area either directly or indirectly; or

- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

The project is consistent with the underlying zone and is consistent with the La Jolla Community Plan Residential land use designation. The project site is located in an established residential neighborhood and is surrounded by similar development. The project site currently receives water and sewer service from the City, and no extension of infrastructure to new areas is required for the project to be implemented. No roadway improvements are proposed as part of the project. As such, the project would not directly or indirectly induce substantial population growth in the area. Additionally, the project would remove the existing single-family residence on site and replace it with a new single-family residence. It would not displace substantial numbers of existing people or housing. Therefore, population and housing–related impacts associated with the project would be less than significant.

7.1.11 Public Services and Facilities

The City Significance Determination Thresholds (2022) state that public services and facilities impacts may be significant if the project would: (1) conflict with the community plan in terms of the number, size, and location of public service facilities; and/or (2) result in direct impacts from construction of proposed new public service facilities needed to serve the project. The significance of a project's impacts should be evaluated relative to construction of public service facilities, particularly whether the project would conflict with the community plan in terms of number, size, and location of public service facilities, as well as if direct impacts from construction of new facilities needed to serve the project would occur.

As noted in Section 5.1, *Land Use*, the project is consistent with the La Jolla Community Plan and the number, size, and location of public service facilities required to serve the site would not change, as noted below:

7.1.11.1 Fire-Rescue

The project site is located within the City of San Diego Fire-Rescue Department (SDFD) service area for fire protection and medical services. The City has 52 fire stations protecting more than 343 square miles and over 1.4 million residents (City of San Diego 2023c). According to the Public Facilities, Services, and Safety Element of the City's General Plan, the first-due unit to treat medical patients and control small fires should arrive within 7.5 minutes, 90% of the time from the receipt of the 911 call in fire dispatch, and a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911-call receipt in fire dispatch, 90% of the time (City of San Diego 2022c). Fire Station 13 serves the La Jolla community and is the nearest fire station to the project site, located approximately 0.9 miles northeast. The station was moved to its current location at 809 Nautilus Street in 1976 and was remodeled and reopened in 2007 (City of San Diego 2023d). Fire Station 13 houses one engine company had a 90 percent response time of 7 minutes and 22 seconds for calendar year 2022 (City of San Diego 2023e).

The project replaces an existing residence with a new residence which is consistent with the residential land use designation pursuant to the La Jolla Community Plan. The project would be constructed in accordance with applicable fire codes and City regulations. The project would also be

required to pay development impact fees (DIFs) prior to issuance of building permits, a portion of which could support maintenance of fire protection and emergency response services provided by the City. The project would not adversely affect existing levels of fire protection services in the area and would not require the construction of new or expanded facilities.

7.1.11.2 Police Services

The project site is located within the San Diego Police Department's Northern Division. The Northern Division Substation is located approximately 4.5 miles from the project site at 4275 Eastgate Mall. Additionally, the project site is located within Beat 125 of the department's Northern Division, which serves the neighborhoods of Bay Ho/Bay Park, Clairemont Mesa East, Clairemont Mesa West, North Clairemont, University City, La Jolla, Mission Bay, Mission Beach, Pacific Beach, and Torrey Pines. The San Diego Police Department (SDPD) does not staff individual stations based on the number of sworn officers per 1,000 population ratio, but it does have a goal of maintaining 1.48 officers per 1,000 population ratio citywide. Providing police protection to the project would not require new facilities or the expansion of existing facilities within the Northern Division because the project replaces an existing residence and does not increase demand on police services. No impact would occur.

7.1.11.3 Parks and Recreation Facilities

The City of San Diego General Plan guides development of park and recreation facilities in the project area. The General Plan provides goals and policies for population-based parks and facilities, resource-based parks, and open space lands. The City's park and recreation goals include achieving a sustainable park and recreation system that meets the needs of residents and visitors and an equitable citywide distribution of parks and recreation facilities (City of San Diego 2021). The project replaces an existing residence with a new residence, is consistent with the land use designation pursuant to the La Jolla Community Plan, and would not increase demand for parks or recreation facilities. No impact would occur.

7.1.11.4 Schools

The project site is located within the San Diego Unified School District (SDUSD), which serves over 121,000 students ranging from preschool through grade 12 in 226 educational facilities (SDUSD 2023). Specifically, the project site is located within the attendance boundaries of Bird Rock Elementary School, Muirlands Middle School, and La Jolla High School. The project replaces an existing residence with a new residence, is consistent with the land use designation pursuant to the La Jolla Community Plan and would not increase demand for school facilities. The project would not result in the need for new or expanded school facilities. No impact would occur.

7.1.11.5 Libraries

Library services are provided by the San Diego Public Library. La Jolla is served by the La Jolla/Riford Library, located at 7555 Draper Avenue, approximately 1.4 miles north of the project site. The project replaces an existing residence with a new residence, is consistent with the land use designation pursuant to the La Jolla Community Plan and would not increase demand for library

services. The project would not result in the need for new or expanded library facilities. No impact would occur.

7.1.12 Transportation and Circulation

The City has adopted the following significance determination thresholds for addressing a project's transportation impacts. According to City Significance Determination Thresholds (2022), a project could have a significant impact on transportation if it would:

- Conflict with an adopted program, plan, ordinance, or policy addressing the transportation system;
- Result in vehicle miles traveled (VMT) exceeding thresholds identified in the City of San Diego Transportation Study Manual;
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and/or
- Result in inadequate emergency access.

7.1.12.1 Adopted Program, Plan, Ordinance, or Policy

The project proposes to demolish an existing residence and construct a new single-family residence in a neighborhood with similar development. The site would be accessible via the replaced sidewalk and relocated driveway off of Camino De La Costa. The project would connect to existing utilities within Camino De La Costa.

The Mobility Element of the General Plan promotes a balanced, multimodal transportation network to make walking, bicycling, and transit use more safe, attractive, and efficient forms of transportation, while addressing the needs of drivers. The Mobility Element contains policies that address multimodal transportation, parking, the movement of goods and services, and other components of a transportation system while balancing the goals of protecting neighborhood characters and environmental resources. Together, these policies advance a strategy for relieving congestion and increasing transportation choices.

As noted in Table 5.1-1, the Project would comply with all relevant policies in the Mobility Element of the General Plan related to pedestrian circulation. Policy ME-A.5 within the Safety and Accessibility Section provides guidelines for sidewalk design. Consistent with the goal of "Minimize obstructions and barriers that inhibit pedestrian circulation," although the project would include driveway relocation and visibility triangle modifications, the project is conditioned to install convex mirror(s) adjacent to the garage door openings and/or pedestrian-alerting devices. The mirrors and/or devices would be placed to facilitate the detection of pedestrians, vehicles, or other obstructions when exiting the garage. As such, the project would not result in an obstruction or barrier to pedestrian circulation. Additionally, the existing sidewalk would be replaced to comply with current City Standards. As such, the project would not alter or adversely affect public transit, bicycle, or pedestrian facilities. The project would not conflict with adopted policies regarding the provision of these services. No impact would occur.

7.1.12.2 Vehicle Miles Traveled

On September 27, 2013, Governor Edmund G. Brown, Jr. signed SB-743 into law, starting a process that fundamentally changes the way transportation impact analysis is conducted under CEQA. Related revisions to the State's CEQA Guidelines include elimination of auto delay, level of service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts.

In December 2018, the California Resources Agency certified and adopted revised CEQA Guidelines, including new section 15064.3. Under the new section, vehicle miles traveled (VMT), which includes the amount and distance of automobile traffic attributable to a project, is identified as the "most appropriate measure of transportation impacts." As of July 1, 2020, all CEQA lead agencies must analyze a project's transportation impacts using VMT.

The City of San Diego Transportation Study Manual (TSM; City of San Diego 2022d) dated September 19, 2022, is consistent with the CEQA guidelines and utilizes VMT as a metric for evaluating transportation-related impacts. Based on these guidelines, all projects shall go through a screening process to determine the level of transportation analysis that is required.

The project involves the construction of a new single-family residence in the place of one single-family residence in a neighborhood which serves similar residential development. A "Small Project" is defined as a project generating less than 300 daily unadjusted driveway trips using the City of San Diego trip generation rates/procedures. A single family residence typically produces 10 daily unadjusted driveway trips. Therefore, based upon the screening criteria identified above, the project qualifies as a "Small Project" and is screened out from further VMT analysis. The project would have a less-than-significant VMT impact.

7.1.12.3 Hazards Due to Design Feature

The project involves the demolition of an existing single-family residence and the construction of a new single-family residence. The project includes construction of a relocated driveway access from Camino De La Costa, which would require modifications from City standards for driveway width and visibility triangles (refer to Table 3-1 of this EIR). The driveway and visibility triangle modifications are proposed to accommodate the existing historically designated detached garage and stucco privacy wall at the site and would be subject to review and approval from the City to ensure appropriate safety standards are met. As required by City Engineering Staff, the project is conditioned to install convex mirror(s) adjacent As such, the proposed driveway would not propose a design feature or incompatible use that could substantially increase road hazards. Impacts would be less than significant.

7.1.12.4 Emergency Access

Adequate emergency access would be provided during both short-term construction (with construction operating protocols) and long-term operations of the project. Emergency access to the site would be provided from the Camino De La Costa and the project’s driveway entrance. As such, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. No impact would occur.

7.1.13 Tribal Cultural Resources

The City has not yet prepared Significance Determination Thresholds for potential impacts to tribal cultural resources. Therefore, for purposes of this analysis, guidance provided by issue questions listed in CEQA Guidelines Appendix G are used to evaluate the potential for significant impacts to tribal cultural resources. Specifically, a significant impact is identified if a project would cause:

- A substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code (PRC) 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:
  - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k); or
  - A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe

The City of San Diego, as Lead Agency, determined that Tribal Cultural Resources pursuant to subdivision PRC Section 5024.1(c) would not be potentially impacted through project implementation. In accordance with the requirements of PRC Section 21080.3.1, the City of San Diego provided formal notification to the Iipay Nation of Santa Isabel, the Jamul Indian Village, and San Pasqual Band of Mission Indians, each of which is traditionally and culturally affiliated with the project area, requesting consultation on May 30, 2023. No responses for consultation were received from the tribes within 30 days of the initial notification. The project is on a developed lot. There are no sites, features, places, cultural landscapes, sacred place, or object with cultural value to a California Native American tribe present at the project site that is listed or eligible for listing in the California Register of Historical Resources (CRHR) or in a local register of historical resources as defined by the PRC. Therefore, the project would not cause a substantial adverse effect to tribal cultural resources, or impact a listed or eligible for listing resource or a significant resource to a California Native American tribe and no impact would occur.

7.1.14 Utilities and Service Systems

According to the City's Significance Determination Thresholds (2022), public utility impacts may be significant if the project would:

- Use excessive amounts of potable water;
- Use predominantly non-drought-resistant landscaping and excessive water usage for irrigation and other purposes;
- Cause a significant increase in demand for public utilities;
- Result in direct impacts from the construction of new or expanded public utilities needed to serve the project; and/or
- Construct or demolish a commercial structure(s) of 40,000 SF or more.

With regard to the specific utility services affected by the project, the following discussion of water supply/conservation, water infrastructure, wastewater infrastructure, and solid waste management is provided.

7.1.14.1 Water Supply/Conservation

The project would replace one single-family residence with a new single-family residence. The replacement construction of a single-family residence with a larger home would increase demand for potable water supply but would not generate excessive water usage for irrigation or other purposes. The project would minimize its demand for potable water by complying with the City's LDC and CALGreen Code with regard to the installation of water conservation devices, such as low-flow toilets, showers, and faucets and low-flow irrigation, as noted in the project's CAP Consistency Checklist (Appendix E). In addition, the landscape plan contains drought-tolerant, native plants in its palette, which would further reduce the project's demand for potable water. Therefore, the project's impacts associated with water supply would be less than significant.

7.1.14.2 Water Facilities

The proposed project would replace one single-family residence with a new single-family residence. Existing water facilities are currently available to the project site. The proposed project would include a private connection to existing water lines in Camino De La Costa that currently connect to the project site to serve the existing residence. The project would abandon the existing water service connection and construct a new connection (of the same size as the existing connection) to the water service main in Camino De La Costa, west of the existing connection. On-site water infrastructure would be designed and sized to meet the project's water needs in conformance with City standards. All water utility infrastructure would be designed and constructed in accordance with the criteria established by the City's current water facility guidelines, regulations, standards, and practices. Therefore, the project would utilize a new connection for water services, but would be served by existing water infrastructure. The project would not require off-site pipeline upsizing. The project would not require substantial alterations to existing utilities such that the construction would create physical impacts. Impacts would be less than significant.

7.1.14.3 Wastewater Facilities and Treatment

The project site is connected to the City's Metropolitan Wastewater System. The project would maintain the existing 4-inch sewer lateral that connects to an existing 8-inch sewer main in Camino De La Costa. On-site wastewater infrastructure would be designed and sized to meet the project's needs in conformance with City standards. Given that the site contains an existing single-family residence, is planned and zoned for residential use, and is located in an urban area, no significant increase in demand for wastewater disposal or treatment would be created by the project, as compared to current conditions. Therefore, the project would be served by existing wastewater infrastructure and would not result in the need for new systems or require substantial alterations to existing wastewater infrastructure, the construction of which would create physical impacts. No impacts would occur.

7.1.14.4 Solid Waste Management

As a single-family residence, the project would not include construction, demolition and/or renovation of 1,000,000 SF or more of building spaces and would not exceed the City's threshold for direct solid waste impacts or include construction, demolition and/or renovation of 40,000 SF or more of building space and would not exceed the City's threshold for cumulative solid waste impacts. Construction activities would generate waste in the form of asphalt and concrete, brick/masonry/tile, cardboard, carpet/padding/foam, drywall, landscape debris, mixed construction and demolition (C&D) debris, roofing materials, scrap metal, unpainted wood and pallets, and garbage/trash. Construction debris would be separated on site into material-specific containers to facilitate reuse and recycling and to increase the efficiency of waste diversion. Source separation at the construction site would be diverted in accordance with the C&D Debris Deposit Ordinance. All construction waste from the project site would be transported to an appropriate facility for diversion and disposal.

Long-term operation of the residential use is anticipated to generate typical amounts of solid waste associated with residential uses similar to what is already produced from the existing residence. Furthermore, the project would be required to comply with the City's Municipal Code requirement for storage and diversion of solid waste during the long-term, operational phase. Impacts are considered to be less than significant.

Compliance with the City's solid waste ordinances would minimize project impacts from solid waste generation. Therefore, the project would not result in the need for new solid waste disposal systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts. Therefore, no impact would occur.

7.1.14.5 Electricity and Natural Gas

An existing San Diego Gas & Electric (SDG&E) power pole is located near the northeast corner of the property. The electrical connection to the proposed residence would be provided via this existing power pole. As discussed in Section 7.1.4, *Energy*, the project would not result in the need for new energy delivery systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts. No impact would occur.

7.1.15 Visual Effects/Neighborhood Character

Based on the City's CEQA Significance Determination Thresholds that are applicable to the project, visual effects/neighborhood character impacts may be significant if the project meets the following criteria.

7.1.15.1 Scenic Views

Projects that would block public views from designated open space areas, roads, or parks or to significant visual landmarks or scenic vista (Pacific Ocean, downtown skyline, mountains, canyons, or waterways. To meet this significance threshold, one or more of the following conditions must apply:

- The project would substantially block a view through a designated public view corridor as shown in an adopted community plan, the General Plan, or the Local Coastal Program. Minor view blockages would not be considered to meet this condition. In order to determine whether this condition has been met, consider the level of effort required by the viewer to retain the view;
- The project would cause substantial view blockage from a public viewing area of a public resource (such as the ocean) that is considered significant by the applicable community plan. Unless the project is moderate to large in scale, the condition identified in the following bullet point would typically have to be met for view blockage to be considered substantial;
- The project exceeds the allowed height or bulk regulations, and this excess results in a substantial view blockage from a public viewing area; and/or
- The project would have a cumulative effect by opening up a new area for development, which will ultimately cause “extensive” view blockage. (Cumulative effects are usually considered significant for a community plan analysis, but not necessarily for individual projects. Project level mitigation should be identified at the community plan level). View blockage would be considered “extensive” when the overall scenic quality of a visual resource is changed; for example, from an essentially natural view to a largely manufactured appearance.

7.1.15.2 Neighborhood Character/Architecture

Projects that severely contrast with the surrounding neighborhood character. To meet this significance threshold, one or more of the following conditions must apply:

- The project exceeds the allowable height or bulk regulations and the height and bulk of the existing patterns of development in the vicinity of the project by a substantial margin.
- The project would have an architectural style or use building materials in stark contrast to adjacent development where the adjacent development follows a single or common architectural theme (e.g., Gaslamp Quarter, Old Town).
- The project would result in the physical loss, isolation or degradation of a community identification symbol or landmark (e.g., a stand of trees, coastal bluff, historic landmark) which is identified in the General Plan, applicable community plan or local coastal program.
- Be located in a highly visible area (e.g., on a canyon edge, hilltop or adjacent to an interstate highway) and would strongly contrast with the surrounding development or natural topography through excessive height, bulk, signage, or architectural projections; and/or

7.1.15.3 Development Features

Projects that have a negative visual appearance. To meet this significance threshold, one or more of the following conditions must apply:

- The project would create a disorganized appearance and would substantially conflict with City codes (e.g., a sign plan which proposes extensive signage beyond the City's sign ordinance allowance).
- The project significantly conflicts with the height, bulk, or coverage regulations of the zone and does not provide architectural interest (e.g., a tilt-up concrete building with no offsets or varying window treatment).

7.1.15.4 Light/Glare

Projects that would emit or reflect a significant amount of light and glare. To meet this significance threshold, one or more of the following must apply:

- The project would be moderate to large in scale, more than 50% of any single elevation of a building 's exterior is built with a material with a light reflectivity greater than 30% (see LDC Section 142.07330(a)), and the project is adjacent to a major public roadway or public area.
- The project would shed substantial light onto adjacent, light-sensitive property or land use, or would emit a substantial amount of ambient light into the nighttime sky. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and industrial uses, and natural areas.

The La Jolla Community Plan and Local Coastal Program Land Use Plan (City of San Diego 2014) identifies public vantage points within the community plan area. The project site is located on a coastal bluff on Camino De La Costa. Camino De La Costa is designated as an Intermittent or Partial Vista; however, the Pacific Ocean is largely obstructed from view along the portion of Camino De La Costa adjacent to the site in the existing condition by the existing garage and stucco privacy walls, and tree canopies associated with landscaping. Views of the ocean are not available from the public roadway directly adjacent to the project site. The project site is located approximately 0.15 mile northwest of a designated public vantage point (identified as public vantage viewpoint 78, *Camino De La Costas includes Cortez Place, Costa Place*, in the Community Plan); however, the viewshed identified in the Community Plan faces south and southwest and does not face in the direction of the project site. The proposed structure and site plan would comply with the RS-1-5 residential zone development regulations related to side yard setbacks, building height, lot coverage, and floor area ratio. Except for necessary modifications for the driveway, the project would comply with all development regulations and observe the height requirements for the zone. The project would include the removal of portions of the privacy stucco wall along the street frontage and the establishment of a 7-foot, 1-inch wide and a 1-foot, 3-inch wide deed-restricted view corridor along the northern and southern property lines, respectively, to increase visibility through the property to the coastline. A visually permeable fence would replace small sections of the existing stucco privacy wall to facilitate views through the corridor. The project is not located on a street or other public area that offers framed public views of panoramic aesthetic features. As discussed above, there are no existing views from public areas (i.e., the adjacent roadway) in the existing condition due to the detached garage, stucco privacy wall, and landscaping; however, the project would improve views

from the adjacent roadway by establishing deed-restricted view corridors at the northern and southern property lines. The project would not degrade the visual character of the project site or its surroundings (as demonstrated in the following paragraphs) and would not create a negative aesthetic site or property. The project occurs within a developed area, on an already developed site, and would not open up a new area for development or cause an extensive view blockage. The new view corridors that are incorporated into the project would improve the existing condition and provide new views of coastal areas. Additionally, the proposed structure would not block any identified public visual corridor and would not block any intermittent or partial vista views.

With regard to neighborhood character and development features, as shown in Figure 3-2, *Exterior Elevations (West and East)*, and Figure 3-3, *Exterior Elevations (North and South)*, the new residential building is designed in a contemporary style of architecture featuring cast-in-place natural grey walls, clear glass lined by black metal framing, wood panels, decorative metal screening, a metal gated entry and sliding gates. The building would be two stories of residential living area, over a ground floor basement level, resulting in a residential structure that would be approximately 30 feet in height above finished grade but would comply with all applicable height requirements. The new structure would be placed behind and west of the historic garage and stucco privacy walls along the Camino De La Costa. The existing garage and the majority of the stucco walls would remain in place and be rehabilitated as part of the project, in accordance with the proposed Treatment Plan (Appendix C) and as described in Chapter 3, *Project Description*. Minor modifications are proposed to accommodate vehicle access to the garage structure and to facilitate visual access through the proposed view corridors. The retention of the historic garage and the majority of the stucco wall would largely maintain the visual appearance of the site directly abutting Camino De La Costa, with the provision of the new view corridors along the northern and southern property lines improving views. New garage doors and a driveway would be installed to access the garage directly from Camino De La Costa, which would slightly modify the overall look of the structure from Camino De La Costa; however, the proposed changes would be designed to maintain the visual appearance of the historic garage structure. The new garage doors would be designed to eliminate the existing blank wall while maintaining the visual appearance of the historic garage structure.

While the proposed residential structure, which would be visible beyond the retained garage, stucco wall, and proposed landscaping, would be larger in scale than the existing residence, the proposed structure and site plan would comply with the RS-1-5 residential zone development regulations related to side yard setbacks, building height, lot coverage, and floor area ratio. The project proposes modifications related to driveway width and visibility triangles to accommodate the existing historically designated detached garage. Additionally, the proposed residential structure would contain large expanses of glass, providing a more transparent structure, and would no longer have a large blank wall along the second story.

In regard to neighborhood character, the project site is located in a single-family residential neighborhood that contains varying architectural styles. Because the neighborhood and surrounding area do not follow a single or common architectural theme, the project would not result in significant impacts associated with the use of architectural styles or building materials in stark contrast with surrounding development. While the project would result in the physical loss of a historic structure, the structure is not a community identification symbol or landmark identified in the General Plan or the La Jolla Community Plan and Local Coastal Program Land Use Plan. The project would result in a continuation of single-family residential uses at the project site. The project

is not located within a highly visible area and would not strongly contrast with the surrounding single-family residential uses. Additionally, as previously discussed, the project would comply with the RS-1-5 residential zone development regulations related to setbacks, height, lot coverage, and floor area ratio except for modifications related to driveway width and visibility triangles to accommodate the existing historically designated detached garage. Updated landscaping would be installed throughout the property. The project would not substantially conflict with City codes; and would not significantly conflict with the height, bulk, or coverage regulations of the RS-1-5 zone. Impacts associated with neighborhood character and development features would be less than significant.

With regard to light and glare, the project site is currently developed and features existing lighting sources consistent with single-family residential uses. In addition, the project area contains several lighting sources, such as streetlights and lighting from surrounding residential uses. The new residential structure would include outdoor lighting typical of residential uses. All lighting would be regulated through compliance with City LDC Section 142.0740. The building façade for the proposed residential dwelling would include cast in place natural grey walls, clear glass lined by black metal, wood panels, decorative metal screening, metal entry and sliding gates. The exterior window system would feature low-e clear glass to minimize its reflectivity. All exterior building materials would avoid excess glare, in accordance with LDC Section 142.0730. The project would not create a substantial source of new light or glare that would adversely affect daytime or nighttime views in the area.

7.1.16 Wildfire

The City has not yet prepared Significance Determination Thresholds for potential impacts associated with wildfire. Therefore, for purposes of this analysis, guidance provided by issue questions listed in CEQA Guidelines Appendix G are used to evaluate the potential for significant wildfire impacts. Specifically, a significant impact is identified if a project would:

- Substantially impair an adopted emergency response plan or emergency evacuation plan;
- Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire;
- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; and/or
- 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.

As discussed in Section 7.1.11, *Public Services and Facilities*, the project site is located within the SDFD service area for fire protection services. Fire Station 13 serves the La Jolla community and is the nearest fire station to the project site, located approximately 0.9 miles northeast.

7.1.16.1 Emergency Response or Evacuation Plan

The City of San Diego participates in the San Diego County Multi-jurisdictional Hazard Mitigation Plan. The project complies with the General Plan and is consistent with the La Jolla Community Plan

land use and the LDC zoning designation. The project is located in an urbanized area of San Diego and construction of a new single-family residence in the place of an existing single-family residence would not disrupt any emergency evacuation routes as identified in the Hazard Mitigation Plan. Therefore, the project would have a less-than-significant impact on an emergency response and evacuation plan during construction and operation.

7.1.16.2 Exacerbate Wildfire Risks

The project site is not located in a VHFHSZ. The project is located in an urbanized neighborhood of similar residential development. The project site is located in a developed, urbanized area, adjacent to the Pacific Ocean. The anticipated residential use would be constructed consistent with applicable standards, including the California Building Code and City Fire Code standards. Compliance with existing building and fire codes would ensure that the project would not result in significant impacts associated with exacerbated wildfire risk. Therefore, impacts would be less than significant.

7.1.16.3 Installation or Maintenance of Infrastructure

The project is located in a fully developed, urbanized area and would replace an existing single-family residence with a new single-family residence. No changes to roadways or installation of utilities are proposed as part of the project (beyond new project connections to some utilities existing within Camino De La Costa). No infrastructure, such as roads, fuel breaks or power lines, are proposed which could result in temporary or ongoing impacts. No impact would occur.

7.1.16.4 Downstream Flooding or Landslides

The central and northeastern portions of the site are characterized by a relatively level pad that supports the existing structures and associated improvements at the project site and descends gently to the southwest. The southwest portion of the project site contains a coastal bluff. The project site would be graded with all drainage from the proposed improvements directed away from the coastal bluff and directed into the existing drainage system as discussed in Section 5.4, *Hydrology*. The project would comply with the City's appropriate Best Management Practices (BMPs) for drainage and would not expose people or structures to significant risks as a result of run-off, post-fire slope instability, or drainage changes. Therefore, a less-than-significant impact would result.

7.2 Growth Inducement

This analysis presents responses to each Initial Study checklist question and demonstrates why the project's effects on growth inducement are not found to be significant. Based on the City's Initial Study Checklist, a proposal could result in significant growth inducement impacts if it would:

- Induce substantial population growth in an area, (for example, by proposing new homes and commercial or industrial businesses beyond the land use density/intensity envisioned in the community plan);
- Substantially alter the planned location, distribution, density, or growth rate of the population of an area; or

- Include extensions of roads or other infrastructure not assumed in the community plan or adopted Capital Improvements Project list, when such infrastructure exceeds the needs of the project and could accommodate future developments.

A project is regarded as growth-inducing if it can foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (CEQA Guidelines Section 15126.2(d)). Included in this definition are projects that would remove obstacles to population growth, such as extending public services into areas not previously served. Growth inducement can also be defined as an action that would encourage an increase in density of development in surrounding areas or encourage adjacent development. Growth should not be assumed to be beneficial, detrimental, or of little significance to the environment (CEQA Guidelines Section 15126.2(d)).

The project includes the demolition of an existing single-family residence, excavation of the site to remove the existing basement and create the building pad, and construction of a new single-family residence in its place. The project site and surrounding area are fully developed with residential uses. Existing infrastructure, including utility services and roadways, are already in place on the project site and surrounding areas. The project would not result in substantial growth inducement because the site is currently developed with a single-family residence and the project would replace the residence with a new single-family residence. Additionally, the project site is located in a developed community in the City of San Diego. The construction of a replacement single-family home would not foster population growth, either directly or indirectly, as it would accommodate the population currently existing rather than opening up a new area of land for population growth. The project would not alter the planned location, distribution, density, or growth rate of La Jolla, adjacent communities, or the City as a whole.

Although the project includes improvements to existing on-site utilities such as water, sewer, and electricity, these improvements would be sized to only serve the needs of the project and would not extend into previously unserved areas. No new infrastructure would be provided that would exceed the needs of the project and/or that could accommodate future growth not already planned for the project area. Development of a single-family residence in place of an existing single-family residence would not foster economic or population growth, either directly or indirectly, such that construction of additional housing in the surrounding area would be required. For these reasons, the project would not encourage or facilitate growth-inducing activities that could significantly affect the surrounding environment, individually or cumulatively.

7.3 Significant Environmental Effects That Cannot Be Avoided if the Project Is Implemented

CEQA Guidelines Section 15126.2(b) requires an EIR to identify significant environmental effects that cannot be avoided if the project is implemented (14 CCR 15000 et seq.). As discussed in Chapter 5, *Environmental Analysis*, implementation of the project would result in significant and unmitigated impacts to Land Use (policy inconsistency) and Historic Resources (built environment).

The project would demolish the residence associated with Casa De Los Amigos, which is a designated City of San Diego Historic Site and has been evaluated as eligible for listing on the CRHR. Demolition would not be consistent with the *Secretary of Interior's Standards for the Treatment of*

Historic Properties (36 Code of Federal Regulations part 68) and their applicable guidelines, because the historical character of the resource would not be retained or preserved. The project proposes demolition of the residence and rehabilitation of the detached garage and stucco privacy wall. The demolition of the residence portion of the historically designated property would be considered a significant and unmitigable impact. The applicant would be required to implement Mitigation Measures HR-1, HR-2, HR-3, and HR-4 outlined in Section 5.3, *Historical Resources*, of this EIR. Implementation of those mitigating measures would reduce the project's impacts to historical resources, but not to below a level of significance. Because the historical resources impacts would not be fully mitigated, the project would also conflict with applicable policies in the General Plan and La Jolla Community Plan related to historic preservation. The land use policy inconsistency would be a significant and unmitigated impact of the project. Furthermore, the project would have a considerable contribution to cumulatively significant and unmitigated impacts to historical resources and land use policy within the City. As such, the project's impact would be considered significant and unavoidable, and a statement of overriding considerations would be required as part of the approval process, in accordance with CEQA Guidelines Section 15093.

7.4 Significant Irreversible Environmental Changes Caused by the Project

CEQA Guidelines Section 15126.2(d) mandates that applicants evaluate significant irreversible environmental changes that can occur as a result of a project. This evaluation should cover both primary and secondary impacts as well as potential environmental accidents associated with the project. Primary impacts can include those associated with the use of nonrenewable resources such as biological habitats, agricultural land, mineral deposits, water bodies, energy resources, and cultural resources.

Furthermore, Section 15126.2(d) also states that irretrievable commitments of resources should be evaluated to ensure that current consumption of such resources is justified. Implementation of the project would not result in significant irreversible impacts to agricultural land, mineral resources, water bodies, paleontological resources, or tribal cultural resources.

The project will require energy and non-renewable resources such as electricity, fossil fuels, natural gas, and construction materials like concrete, asphalt, sand and gravel, steel, petrochemicals, and lumber, as well as potable water and labor during construction. It is mandatory for the project to comply with Title 24 Building Standards and the CALGreen Code, as discussed earlier. Furthermore, the project will incorporate several sustainable building practices into the project to reduce energy and non-renewable resource consumption. These sustainable measures, including the use of low-flow fixtures/appliances and low-flow irrigation, solar energy, and other related sustainable practices that are consistent with the California Green Building Code, will be part of the project's conditions of approval.

During the implementation of the proposed plan, the project will use energy resources during construction projects and will consume energy to provide lighting, heating, and cooling for future development. The construction of the project will also require resources such as lumber and other related forest products, sand, gravel, concrete, asphalt, petrochemical construction materials, steel, copper, lead, and other metals, and water for construction projects resulting from the

implementation of the proposed Plan. The use of these resources will have an impact on the regional consumption of these commodities.

Moreover, in addition to the traditional nonrenewable resources discussed above, the project proposes the demolition of the existing historically designated residence (while retaining and rehabilitating the detached garage and stucco privacy wall). Although mitigation measures HR-1 through HR-4, require Historic American Building Survey (HABS) documentation, architectural salvage, rehabilitation work and monitoring plan for the garage and side wall, and an interpretation plaque, the demolition of the historic residence would still represent an irreversible impact.

8. PROJECT ALTERNATIVES

8.1 Introduction

In accordance with CEQA Guidelines Section 15126.6(a), an EIR must contain a discussion of "a range of reasonable alternatives to the project, or to the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Section 15126.6(f) further states that "the range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice."

The following discussion focuses on project alternatives that are capable of eliminating significant environmental impacts or substantially reducing them as compared to the project, even if the alternative would impede the attainment of some project objectives, or would be more costly. In accordance with CEQA Guidelines Section 15126.6(f)(1), among the factors that may be taken into account when addressing the feasibility of alternatives are (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site. Not one of these factors establishes a fixed limit on the scope of reasonable alternatives. An alternative does not need to be considered if its environmental effects cannot be reasonably ascertained and if implementation of such an alternative is remote or speculative.

The evaluation of individual alternatives considered in detail is provided in Sections 8.4.1 through 8.4.3, with summary of the project alternatives and identification of the environmentally superior alternative outlined in Section 8.5. A matrix comparing the alternatives analyzed in detail is provided thereafter.

8.2 Summary of Project Objectives and Significant Effects

As required in CEQA Guidelines Section 15126.6(a), in developing the alternatives to be addressed in this section, consideration was given regarding an alternative's ability to meet most of the basic objectives of the project. These objectives are presented in Chapter 3, *Project Description*, of this EIR and are provided below for ease of reference:

8.2.1 Project Objectives

The project objectives of the 6110 Camino De La Costa Project are as follows:

- Provide a structurally secure single-family residence, which preserves, to the extend feasible, the designated historical resource or portions thereof.
- Develop a project that is consistent with the goals and policies of the *La Jolla Community Plan and Local Coastal Program Land Use Plan to the maximum extent feasible*.

- Propose a design that achieves a harmonious visual relationship between the bulk and scale of the existing and adjacent residences.

8.2.2 Significant Impacts of the Proposed Project

Based on the analysis contained in Chapter 5, *Environmental Analysis*, the project would result in significant impacts to land use (i.e., General Plan and Community Plan policy inconsistency related to preservation of a historical resource) and historical resources (i.e., direct impact to a historically significant structure resulting in an inconsistency with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*). Mitigation measures have been identified that would reduce impacts to the historic structure, to the extent feasible; however, because the project would result in the demolition of the existing residence, and the demolition of a historic structure cannot be mitigated to a less than significant level, impacts to land use and historical resources would remain significant and unavoidable.

In accordance with CEQA Guidelines Section 15126.6(c), the following analysis of project alternatives is preceded by a brief description of the rationale for selecting the alternatives to be discussed. In addition, alternatives that were considered but rejected are also identified.

It should be noted that CEQA does not compel a lead agency to adopt an alternative that is less environmentally damaging than the project, but only to identify feasible alternatives that could avoid or substantially lessen the project's significant environmental effects. The California Legislature declared in CEQA that "in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof" (Public Resources Code Section 21002).

8.3 Alternatives Considered but Rejected

In accordance with CEQA Guidelines Section 15126.6(f)(2)(A), alternative locations for the project would be considered if "any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR." If the project were developed on an alternative site in the community or other areas of the city or county, significant environmental impacts could result that would not occur with the proposed development of the project site.

8.3.1 Alternate Project Location Alternative

Off-site alternatives should be considered if development of another site is feasible and if development of another site would substantially lessen or avoid the significant impacts of the project. Factors that need to be considered when identifying an off-site alternative include the size of the site, its location, the General Plan (or other applicable planning document) land use designation, availability of infrastructure, and whether or not the applicant can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). More specifically, this project is a single-family residence that is owned and will be

occupied by the project applicant. The applicant ownership limits the implementation of the project on other parcels.

A proposed project site in the Lower Hermosa neighborhood of La Jolla requires the demolition of existing structures due to substantial structural and foundation issues. An alternate project location was considered to preserve the coastal bluff setback in open space via a covenant of easement (COE). However, after reviewing the surrounding neighborhoods, it was found that there are no other reasonable alternative locations for the project that would meet its objectives and avoid or reduce unavoidable impacts.

An alternate project location would construct a new single-family residence elsewhere within the Lower Hermosa neighborhood of La Jolla while keeping the existing structures intact at the project site. However, there are no available properties within the Lower Hermosa neighborhood that would provide an alternate location for the project. The subject area was expanded to include the Windansea Beach neighborhood to the north, the Beach Barber Tract neighborhood to the east, and the Bird Rock neighborhood to the south. A review of the surrounding neighborhoods did not reveal any bluff-top properties. However, a few remaining properties were inland from the bluff but west of La Jolla Boulevard. The majority of the remaining properties are located on flat topography. Therefore, the proposed house would need to be substantially redesigned in order to have a different foundation.

The Alternate Project Location Alternative would meet the project objectives. Specifically, it would provide a structurally secure single-family residence and would preserve the designated historical resource. This alternative would also be consistent with the goals and policies of the La Jolla Community Plan and Local Coastal Program Land Use Plan, and would create a harmonious visual relationship between the bulk and scale of the existing and adjacent residences. However, there are no available properties within the neighborhood or surrounding neighborhoods that would allow for the implementation of the Alternative Project Location Alternative. Because there are no other reasonable alternative locations for the Project, an alternate project location was not studied further.

8.3.2 Relocation Alternative

The Relocation Alternative would relocate the Casa De Los Amigos to a new location prior to initiating construction on the project site. Once relocated, rehabilitation consistent with the Secretary of Interior Standards would be implemented to enable its sale to a third party for reuse. This alternative would transfer the structure's historical designation status to the new site, thus freeing up the project site for the implementation of the project as proposed.

For this alternative, an investigation was undertaken by the applicant to explore the option of relocating the designated historical resource to an appropriate site within La Jolla's Lower Hermosa neighborhood for rehabilitation and reuse. A search of the Lower Hermosa neighborhood has determined that there are noavailable, oceanfront properties within the Lower Hermosa neighborhood to move the structures. Therefore, this alternative would require acquisition of a property with existing development, and demolition of the existing home on that site to accommodate relocation of Casa De Los Amigos. Relocation of Casa De Los Amigos resource would require the residence to be segmented for transport. Four occupied properties in the Lower

Hermosa neighborhood that were for sale as of November 2023 and were reviewed by the applicant for adequacy as a relocation site for Casa De Los Amigos. Due to the footprint and multi-level stepped configuration of the existing historic residence, a relocation lot would require a sloped lot to accommodate the layout and footprint of the Casa De Los Amigos residence. The applicant determined that it is very unlikely that the available sites would feature sloping terrain that could accommodate the existing residence without substantial reconfiguration of the structure. In addition, oceanfront homes in the Lower Hermosa neighborhood would likely share a similar constraint as the project site, with reduced bluff edge setbacks and the existing homes proximity to the bluff edge. In consideration of these factors, the Relocation Alternative was not considered for further analysis.

8.3.3 Structural Repair Alternative

The Structural Repair Alternative would entail retaining the existing historic structure at its current location along the coastal bluff edge and implementing repairs to address the existing structural and foundation conditions documented by the structural engineer (DCI Engineers 2023). Under this alternative, the structure would be rehabilitated to habitable standards such that the historic improvements could be retained.

As documented in the structural engineering study referenced in Section 5.2, *Geologic Conditions*, the structural integrity of the existing residence shows significant deterioration, including evidence of cracking of concrete walls which appears to indicate some settlement/building movement and grade beams and columns show significant damage. The grade beam and column foundation structure is showing signs of substantial corrosion and deterioration in a large percentage of structural elements. Some beams are in advanced stages of flexural failure and appear to be deflecting to and resting upon soil. Other beams are exhibiting shear cracks and are in various stages of failure. Multiple columns have substantial spalling (i.e., breaking off in fragments or into smaller pieces) and corrosion in reinforcing and could begin to fail in compression as spalling continues or in shear in a seismic event. While a complete failure of any element may not be imminent, the substructure is in a stage of significant distress which would eventually result in structural failure. According to the structural engineering study, approximately 60 to 70 percent of the lateral or vertical load systems necessitate complete removal and replacement due to the current condition of the structure and the need to embed all new structural systems securely into the native soil per the recommendations of the Geotechnical Investigation performed by DCI Engineers, 2023). Although previously conforming and not required to comply with the current coastal bluff setback requirements codified in the San Diego Municipal Code (SDMC), the extent of site work necessary to repair and rehabilitate the building to address the unsafe structural conditions would terminate the previously conforming status (pursuant to SDMC Section 127.0104(e)(1) and (2)), thereby making the structure non-conforming by reason of its proximity to the coastal bluff. Therefore, the Structural Repair Alternative was not considered for further study.

8.3.4 Partial Removal Alternative

The Partial Removal Alternative would involve the partial removal of the portions of the existing single-family residence within the standard 40-foot coastal bluff setback. . The remaining portions of the existing single-family residence would be rehabilitated to habitable standards. This alternative would require removal of approximately 73 percent of the residence's habitable square footage, and

would include removal of two existing bedrooms, living room, family room, dining room, and kitchen. Due to the "U" shape of the residence, the removal of the portion of the structure within the 40-foot coastal bluff setback would result in the remaining portions of the residence consisting of two separate structures, the north and south wings of the residence. The removal of the portion of the structure within the 40-foot coastal bluff setback would result in a large reduction in habitable space for the residence, with a total remaining occupiable space of 1,453 square feet (SF). The large reduction of occupiable space, in combination with the remaining structure being divided into two parts would hamper the functionality of the residence to a large degree. Additionally, this alternative would not eliminate the significant impacts to historical resources and the associated significant land use impact associated with policy inconsistency because of demolition of a large portion of the existing residence. Therefore, the Partial Removal Alternative was not carried forward for further analysis.

8.4 Alternatives Considered

Table 8-1, *Key Features Comparison – Project and Alternatives*, contains a summary of the key project design features of the 6110 Camino De La Costa Project and the design alternatives presented in this subsection.

Table 8-1
KEY FEATURES COMPARISON – PROJECT AND ALTERNATIVES

Project or Alternative Component	Project	No Project/ No Development Alternative	On-Site Relocation and Partial Removal Alternative	On-Site Relocation and New Structure Alternative	25-foot Setback Alternative
Demolition (SF)	5,086	N/A	1,048	1,268	3,107
Relocation (SF)	N/A	N/A	3,589	1,374	0
New Construction (SF)	8,649	N/A	0	6,725	2,072
Total Residence (SF)	8,649	N/A	3,994	8,099	4,051
Coastal Bluff Setback	25 to 40 feet	N/A	40	40	25

Source: JMAN Investments, Inc. 2023b
Notes: SF = square feet; N/A = not applicable

8.4.1 No Project/No Development Alternative

Consideration of a no project alternative is required by CEQA Guidelines Section 15126.6(e). The analysis of a no project alternative must discuss the existing conditions at the time the Notice of Preparation was published (i.e., July 17, 2023), as well as "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services" [CEQA Guidelines Section 15126.6(e)(2)]. The requirements also specify that, "If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other

project, this 'no project' consequence should be discussed" [CEQA Guidelines Section 15126.6(e)(3)(B)]. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving a project with the impacts of not approving the project.

Under the No Project/No Development Alternative for this EIR, construction of the Project would not occur. The site would remain as it is today as described in Chapter 2, *Environmental Setting*. Specifically, the existing two-story residence with a single subterranean (basement) level, detached garage, and stucco privacy wall would remain intact. The existing hardscape, landscape, driveway entry, underground utilities, and the stone walls, walkway and staircase located along the existing coastal bluffs would remain on site. No changes to the existing site would occur under the No Project/No Development Alternative.

Because this alternative would not result in a new residence or improvements on the existing project site, this alternative would not achieve the project's objectives related to providing a structurally secure single-family residence, which preserves, to the extent feasible, the designated historical resource or portions thereof, developing a project consistent with the goals and policies of the La Jolla Community Plan and Local Coastal Program Land Use Plan, and proposing a design that would create a harmonious visual relationship between the bulk and scale of the existing and adjacent residences.

8.4.1.1 Environmental Analysis

Land Use

Under the No Project/No Development Alternative, the existing structures and uses would continue to exist on the project site consistent with the General Plan, La Jolla Community Plan, and zoning for the project site. Without the demolition of the residence portion of Casa De Los Amigos and the rehabilitation of the detached garage and stucco privacy wall, there would not be a physical impact to historical resources and no associated land use policy impacts would occur. Therefore, significant impacts to land use would be avoided by this alternative. Similar to the proposed project, the No Project/No Development Alternative would not conflict with the City's MSCP Subarea Plan, physically divide an established community, or be incompatible with an adopted ALUCP.

Geologic Conditions

The No Project/No Development Alternative would not result in development or ground disturbance on the project site, and no impacts related to geologic conditions would occur. No change in the existing geologic conditions at the project site would occur. This alternative would avoid the less-than-significant geologic impacts of the project.

Historical Resources

Under the No Project/No Development Alternative, the existing historic residential structure at 6110 Camino De La Costa would not be demolished and the new single-family residence would not be constructed. This alternative would avoid the demolition of the single-family residence portion of Casa De Los Amigos, thereby avoiding the project's significant impact to historical resources.

Hydrology

The No Project/No Development Alternative would not alter the hydrology of the site. There would be no changes to drainage systems on site; stormwater would continue its uncontrolled flow across the project site to the Pacific Ocean. There would be no changes to impervious surfaces, no associated increase in runoff, and no changes in on- or off-site drainage patterns. No impact would occur, and the project's less-than-significant hydrology impacts would be avoided under this alternative.

Water Quality

As the No Project/No Development Alternative would not result in redevelopment of the project site, it would not result in water quality impacts. Water quality conditions at the project site would remain as they currently are. The less-than-significant water quality impacts identified for the project would be avoided under the No Project/No Development Alternative.

8.4.2 On-Site Relocation and Partial Removal Alternative

In an effort to avoid or reduce significant historical resources and land use impacts associated with demolishing the Casa De Los Amigos residence, the On-Site Relocation and Partial Removal Alternative would relocate the portion of the single-family residence that is within the 40-foot coastal bluff setback to the portion of the site outside of the 40-foot setback (**Figure 8-1**, *On-Site Relocation and Partial Removal Alternative*). This setback distinction was set to show consistency with a bluff setback without the permitted reduction for the 25-foot setback.

Relocating the portion of the building that is within the 40-foot coastal bluff setback would require partial demolition of the structure, consisting of all portions of the structure that are outside of the 40-foot coastal bluff setback (consisting of sections of the north and south wings of the residence). These wings currently house the living room, family room, dining room and kitchen. The removal of this portion of the structure would allow for relocation of the portion of the structure that is currently within the 40-foot coastal bluff setback, to outside of the 40-foot coastal bluff setback. This alternative would also rehabilitate the relocated historic building section to habitable standards. This alternative would remove the front door, courtyard with fountain, lower one-story portions of the residence flanking each side of the entry way, the archways along the northern and southern sides of the entryway, and forecourt. The dormer portion of the structure would be moved closer to the garage. New foundations, excavation, retaining walls and sitework would be required.

This alternative would relocate 1,482 SF (and the balcony) of the first level of the residence, 457 SF of the second level of the residence, and the 1,650 SF basement. The removed portion of the residence totals 1,048 SF, and the resulting relocated residence would have a total area of 3,994 SF, including the basement, resulting in a residential space that is approximately half the size of the Casa De Los Amigos project. Similar to the proposed project, this alternative would remove the existing stone walls, walkway and staircase located along the existing bluff, and would record a COE on the coastal bluff to mean high tide. The On-Site Relocation and Partial Removal Alternative would also retain and rehabilitate the 499 SF historic wood stucco garage structure and stucco front yard privacy wall and entries along the street frontage and modify the structure to accommodate the required on-site parking.

The On-Site Relocation and Partial Removal Alternative would meet all of the project objectives. Specifically, it would provide a structurally secure single-family residence, which preserves, to the extent feasible, the designated historical resource or portions thereof. This alternative would also be consistent with the goals and policies of the La Jolla Community Plan and Local Coastal Program Land Use Plan with the exception of the policies related to historic preservation, and would create a harmonious visual relationship between the bulk and scale of the existing and adjacent residences.

8.4.2.1 Environmental Analysis

Land Use

The On-Site Relocation and Partial Removal Alternative would not require a reduction from the 40-foot setback requirement in the SDMC, as the 40-foot setback would be maintained under this alternative. Implementation of the On-Site Relocation and Partial Removal Alternative would result in a partial demolition of the historically designated residence. Similar to the project, this alternative would require mitigation measures such as Historic American Building Survey (HABS) documentation, salvage, a rehabilitation work and monitoring plan, and interpretive signage; however, since part of the structure would be demolished, the impact, while reduced compared to the project, would remain significant and unavoidable. Because this alternative would partially demolish a designated historical resource, this alternative would be inconsistent with the goals of the Historic Preservation Element. This alternative's inconsistency with the historical resources goals in the Historic Preservation Element results in a secondary impact to the existing Casa De Los Amigos residence (namely its partial demolition), resulting in a significant land use policy impact. Thus, the On-Site Relocation and Partial Removal Alternative would result in a significant and unavoidable land use policy impact, similar to the project. Because this alternative results in a partial removal of the residence, the impact would be reduced as compared to the project; however, it would still be significant.

Similar to the proposed project, the On-Site Relocation and Partial Removal Alternative would not conflict with the City's MSCP Subarea Plan, physically divide an established community, or be incompatible with an adopted ALUCP.

Geologic Conditions

Under this alternative, the portions of the structure that are retained and relocated would be structurally repaired and rehabilitated to habitable standards, including rehabilitation to meet current California Building Code (CBC), seismic design parameters of the Structural Engineers Association of California, City standards, and site- specific geotechnical recommendations. Compliance with these standards would ensure that impacts associated with geologic hazards would be less than significant and would be similar to those identified for the project. Further, as discussed in Section 5.2, there is no potential for impacts from landslides at the project site, based on the characteristics of the underlying formation materials. The on-site bluff conditions are stable and would not be susceptible to erosion and instability due to tsunamis; the 40-foot setback incorporated into this alternative would not increase the structure's protection from coastal bluff hazards as the geotechnical engineer determined that a 25-foot setback was sufficient over the engineering lifespan of the project. Similar to the project, less than significant geologic hazards impacts would occur under this alternative.

Regarding soil erosion, potential erosion and sedimentation impacts could occur for the On-Site Relocation and Partial Removal Alternative in association with grading, excavation, and vegetation disturbance. Potential soil erosion impacts would be avoided or reduced to below a level of significance by required adherence to erosion control standards pursuant to applicable National Pollutant Discharge Elimination System (NPDES) and related City regulations, which would require the use of appropriate Best Management Practices (BMPs) to be implemented as part of City/NPDES storm water standards.

As discussed in Section 5.2, *Geologic Hazards*, soil materials at the project site are relatively competent and are not anticipated to be subject to liquefaction, have low to moderate expansive potential and unsuitable fill materials and upper old paralic deposits for the support of settlement sensitive improvements. The incorporation of soil-specific recommendations from the site-specific geologic investigation would be required for development of the On-Site Relocation and Partial Demolition Alternative. Approval of a final geotechnical investigation and incorporation of recommendations for a stable development would be required by and verified by the City prior to site development under this alternative, which would ensure potential impacts related to bluff stability and erosion remain less than significant. Impacts would be similar to those identified for the project.

Historical Resources

This alternative would result in partial demolition of the residence, which is part of City of San Diego Historic Site #1481. While this alternative would result in only a partial removal of the existing residence associated with Casa De Los Amigos, the partial demolition of the residence would result in a significant impact to the locally designated and CRHR-eligible historic resource. Similar to the project, this alternative would require mitigation measures, to the extent feasible, such as HABS documentation, salvage, a rehabilitation work and monitoring plan, and interpretive signage; however, since part of the structure would be demolished, the impact, while substantially reduced compared to the project, would remain significant. In regard to archaeological resources, this alternative is not expected to result in direct impacts to subsurface archaeological resources, including religious or sacred uses, or human remains. Impacts to subsurface archaeological resources would be the same under this alternative as those identified for the project.

Hydrology

The On-Site Relocation and Partial Removal Alternative would result in less impervious surfaces at the site as compared to the project, due to the increased coastal bluff setback and reduced structure size. Site improvements under the On-Site Relocation and Partial Removal Alternative would include drainage improvements to alter the existing drainage pattern at the site and would be sized to accommodate expected flows, as required by the City stormwater regulations. Similar to the project, this alternative would be designed to drain into a sump basin and stormwater would be pumped via an under-sidewalk drain to the existing storm drain system in the Camino De La Costa right-of-way. Implementation of the project would require conformance with federal, State, and local regulations related to hydrology and drainage. Similar to the project, this alternative would result in less-than-significant hydrology and drainage impacts.

Water Quality

Demolition and relocation activities associated with the On-Site Relocation and Partial Removal Alternative would result in the potential to affect water quality, similar to the project. As discussed in Section 5.5, *Water Quality*, erosion/sedimentation, the use and storage of construction-related hazardous materials (e.g., fuels, etc.), and generation of debris from demolition activities have the potential to affect water quality. Activities occurring under the On-Site Relocation and Partial Removal Alternative would be required to submit a Water Pollution Control Plan (WPCP), implement BMPs, and would be conditioned to comply with the City's Storm Water Standards Manual and Grading Regulations. Similar to the project, this alternative would be required to comply with applicable water quality requirements, including those of the City and Regional Water Quality Control Board (RWQCB), and other applicable federal, State, and local regulations. Compliance with the water quality standards is ensured through permit conditions provided by the City's Land Development Review (LDR) Engineering. Impacts associated with pollutant discharge and local and regional water quality would be less than significant under the On-Site Relocation and Partial Removal Alternative, the same as identified for the project.

8.4.3 On-Site Relocation and New Structure Alternative

In an effort to avoid or reduce significant and unavoidable historic resources and land use impacts associated with demolishing the Casa De Los Amigos residence, the On-Site Relocation and New Structure Alternative would involve the partial demolition and relocation of a portion of the existing residence (from within the 40-foot coastal bluff setback to outside of the setback), preserving the northern wing and dormer, and construction of a new structure, which would be adapted to connect with the relocated portion of the residence (**Figure 8-2**, *On-Site Relocation and New Structure Alternative*).

This alternative would relocate the existing north wing to the northeast, so that the entire north wing is outside of the 40-foot coastal bluff setback. This alternative would result in the removal of approximately 50 percent of the original home's habitable square footage, and would include removal of the living room, family room, dining room, and kitchen. This alternative would demolish 1,268 SF of the existing residence outside of the 40-foot coastal bluff setback to accommodate the relocated northern wing and dormer and would remove the remaining portion of the residence within the 40-foot coastal bluff setback following relocation of the existing north wing. This setback distinction was set to show consistency with a bluff setback without the permitted waiver for the 25-foot setback. The relocated north wing would include 419 SF of basement, 917 SF on the first level, and 457 SF on the second level. The new structure, which would connect to the relocated north wing, would consist of 2,102 SF each for the basement, first, and second levels, resulting in a total of 6,306 SF of new structure. Including the new construction and the 1,793 SF of relocated north wing and dormer, this alternative would result in a total residence size of 8,099 SF. This alternative would require new foundations, substantial excavation, retaining walls, and sitework to implement the relocation, removal, and construction of structures. This alternative would remove the existing stone walls, walkway and staircase located along the existing bluff, and would record a COE on the coastal bluff to mean high tide. This alternative would also retain and rehabilitate a 499 SF historic wood stucco garage structure and stucco front yard privacy wall and entries along the street frontage and modify the structure to accommodate the required on-site parking.

The On-Site Relocation and New Structure Alternative would meet all of the project objectives. Specifically, it would provide a structurally secure single-family residence, which preserves, to the extent feasible, the designated historical resource or portions thereof. This alternative would also be consistent with the goals and policies of the La Jolla Community Plan and Local Coastal Program Land Use Plan with the exception of the policies related to historic preservation, and would create a harmonious visual relationship between the bulk and scale of the existing and adjacent residences.

Land Use

The On-Site Relocation and New Structure Alternative would not require a reduction from the 40-foot setback requirement in the SDMC, as the 40-foot setback would be maintained under this alternative. The On-Site Relocation and New Structure Alternative would result in the partial demolition of the historically designated residence. Similar to the project, this alternative would require mitigation measures such as HABS documentation, salvage, a rehabilitation work and monitoring plan, and interpretive signage; however, since part of the structure would be demolished and the portion that is retained would be relocated on site, the impact, while reduced compared to the project, would remain significant. Because the project would partially demolish a designated historical resource, altering the integrity of the resource, the On-Site Relocation and New Structure Alternative would be inconsistent with the goals of the Historic Preservation Element, resulting in a secondary impact to the existing Casa De Los Amigos residence (namely its partial demolition). This would result in a significant land use policy impact. Thus, the On-Site Relocation and New Structure Alternative would result in a significant land use policy impact, similar to the project. Because this alternative results in a partial removal of the residence and relocation within the project site of the remaining portion, the impact would be reduced as compared to the project; however, it would still be significant.

Similar to the proposed project, the On-Site Relocation and New Structure Alternative would not conflict with the City's MSCP Subarea Plan, physically divide an established community, or be incompatible with an adopted ALUCP.

Geologic Conditions

This alternative would retain and relocate a portion of the existing structure. The portions of the structure that are retained and relocated would be structurally repaired and rehabilitated to habitable standards, including compliance with current CBC standards, seismic design parameters of the Structural Engineers Association of California, City standards, and site- specific geotechnical recommendations. Compliance with these standards under the On-Site Relocation and New Structure Alternative would ensure that impacts associated with geologic hazards would be less than significant and would be similar to those identified for the project. Further, as discussed in Section 5.2, *Geologic Conditions*, there is no potential for landslide impacts and the on-site bluff conditions are stable and would not be susceptible to erosion and instability due to tsunamis. The 40-foot setback incorporated into this alternative would not increase the structure's protection from coastal bluff hazards as the geotechnical engineer determined that a 25-foot setback was sufficient over the engineering lifespan of the project. Similar to the project, less-than-significant geologic hazards impacts would occur under the On-Site Relocation and New Structure Alternative.

Regarding soil erosion, potential erosion and sedimentation impacts could occur under this alternative during grading, excavation, and vegetation disturbance. Potential soil erosion impacts

would be avoided or reduced to below a level of significance by required adherence to erosion control standards pursuant to applicable NPDES and related City regulations, which would require the use of appropriate BMPs to be implemented as part of City/NPDES storm water standards.

As discussed in Section 5.2, *Geologic Hazards*, soil materials at the project site are relatively competent and are not anticipated to be subject to liquefaction due to such factors as soil density, grain-size distribution, and absence of shallow ground water. The majority of the surficial soils at the site possess a low to moderate expansive potential. The existing potentially compressible fill materials and uppermost portions of the old paralic deposits are considered unsuitable for the support of settlement sensitive improvements. These unsuitable materials extend to a maximum estimated combined depth of about 9 feet below existing grade. The incorporation of soil-specific recommendations from the site-specific geologic investigation would be required for development of the On-Site Relocation and New Structure Alternative. Approval of a final geotechnical investigation and incorporation of recommendations for a stable development would be required by and verified by the City prior to site development under this alternative, which would ensure potential impacts related to bluff stability and erosion remain less than significant. Impacts would be similar to those identified for the project.

Historical Resources

This alternative would result in partial demolition of the residence, which is part of City of San Diego Historic Site #1481, and relocation of the remaining portion of the residence. Similar to the project, this alternative would retain the existing 499 SF historic garage and associated privacy stucco wall. This alternative would result in a partial removal of the existing residence associated with Casa De Los Amigos, which would remove a reduced portion of the residence as compared to the project; however, the partial demolition and relocation of the remaining portion of the residence would result in a significant impact to the locally designated and CRHR-eligible historic resource. Similar to the project, this alternative would require mitigation measures, to the extent feasible, such as HABS documentation, salvage, a rehabilitation work and monitoring plan, and interpretive signage; however, since part of the structure would be demolished, the impact, while substantially reduced compared to the project, would remain significant and unavoidable. In regard to archaeological resources, this alterative is not expected to result in direct impacts to subsurface archaeological resources, including religious or sacred uses, or human remains. Impacts to subsurface archaeological resources would be the same under this alternative as those identified for the project.

Hydrology

The On-Site Relocation and New Structure Alternative would result in a slight reduction in impervious surfaces at the site as compared to the project, due to the increased coastal bluff setback and slightly reduced structure size. Site improvements under the On-Site Relocation and New Structure Alternative would include drainage improvements to alter the existing drainage pattern at the site and would be sized to accommodate expected flows. Similar to the proposed project, this alternative would be designed to drain into a sump basin and would be pumped via an under-sidewalk drain to the Camino De La Costa public street right-of-way. Implementation of the project would require conformance with federal, State, and local regulations related to hydrology

and drainage. Similar to the project, this alternative would result in less-than-significant hydrology and drainage impacts.

Water Quality

Demolition and relocation activities associated with the On-Site Relocation and New Structure Alternative would result in the potential to affect water quality, similar to the project. As discussed in Section 5.5, *Water Quality*, erosion/sedimentation, the use and storage of construction-related hazardous materials (e.g., fuels, etc.), and generation of debris from demolition activities have the potential to affect water quality. As discussed for the project, activities occurring under the On-Site Relocation and New Structure Alternative would be required to submit a WPCP, implement BMPs, and would be conditioned to comply with the City's Storm Water Standards Manual and Grading Regulations. Similar to the project, this alternative would be required to comply with applicable water quality requirements, including those of the City and RWQCB, and other applicable federal, State, and local regulations. Compliance with the water quality standards is ensured through permit conditions provided by the City's LDR Engineering. Impacts associated with pollutant discharge and local and regional water quality would be less than significant under the On-Site Relocation and New Structure Alternative, the same as identified for the project.

8.4.4 25-Foot Setback Alternative

In an effort to avoid or reduce significant historical resources and land use impacts associated with demolishing the Casa De Los Amigos residence, the 25-foot Setback Alternative would involve the partial demolition of the existing residence (outside of the 25-foot bluff setback) and the construction of a new second-story structure, which would be designed to incorporate the retained portion of the existing structure (**Figure 8-3**, *25-foot Setback Alternative*).

This alternative maintains a 25-foot bluff setback while removing an approximate 3,107-square-foot (SF) portion of the existing 5,086 SF single-family residence. The removal would include approximately 1,000 SF of the basement, 1,650 SF on the first floor, and 457 SF on the second story, retaining approximately 1,979 SF of the existing residence. The 25-foot Setback Alternative would add a 2,072 SF addition to the second story, resulting in a structure of approximately 4,051 SF.

This alternative would require a new foundation, excavation, retaining walls, and sitework to implement the removal of a portion of existing structures and the construction of a new addition. The removal of the portion of the home west of the 25-foot setback would leave a new structural edge of the existing structure to be modified for structural stability and conformance with current standards. While part of the original structure would be maintained, the existing footings and grade beams would be required to be repaired to accommodate the second-story addition. The existing stone walls, walkway, and staircase located along the existing bluff would be removed. Consistent with the project, a Covenant of Easement would be recorded to preserve all Environmentally Sensitive Lands west of the 25-foot bluff setback. The historic wood framed garage structure with stucco finish and front yard privacy wall with stucco finish, along with the entries along the street frontage, would be retained and rehabilitated with modifications. The proposed modifications to the garage would accommodate the required on-site parking for the project.

The 25-foot Setback Alternative would meet all project objectives. Specifically, it would provide a structurally secure single-family residence, which preserves, to the extent feasible, the designated historical resource or portions thereof. This alternative would also be consistent with the goals and policies of the La Jolla Community Plan and Local Coastal Program Land Use Plan, with the exception of the policies related to historic preservation, and would create a harmonious visual relationship between the bulk and scale of the existing and adjacent residences.

8.4.4.1 Environmental Analysis

Land Use

Similar to the project, the 25-foot Setback Alternative would require a reduction from the 40-foot setback, as permitted by the SDMC. The 25-foot Setback Alternative would result in the partial demolition of the historically designated residence. Similar to the project, this alternative would require mitigation measures such as HABS documentation, salvage, treatment plan, monitoring plan, and interpretive signage; however, since part of the structure would be demolished, the impact, while reduced compared to the project, would remain significant. Also, the addition of a second-story would impact the historic integrity of the remaining structure. Because the project would partially demolish a designated historical resource, altering the integrity of the resource, the 25-foot Setback Alternative would be inconsistent with the goals of the Historic Preservation Element, resulting in a secondary impact on the Casa De Los Amigos residence (namely, its partial demolition and modification). Similar to the project, this would result in a significant impact on land use policy. Because this alternative results in partial removal of the residence, the impact would be reduced compared to the project; however, it would still be significant. Also, the addition of a second story would impact the historic integrity of the remaining structure.

Similar to the project, the 25-foot Setback Alternative would not conflict with the City's MSCP Subarea Plan, physically divide an established community, or be incompatible with an adopted ALUCP. The impact would be similar to those identified for the project and would be less than significant.

Geologic Conditions

This alternative would retain a portion of the existing structure. The portions of the structure that are retained would be structurally repaired and rehabilitated to existing standards, including compliance with current California Building Code (CBC) standards, seismic design parameters of the Structural Engineers Association of California, City standards, and site-specific geotechnical recommendations. Reinforcement or complete replacement of the foundation to ensure structural stability and safety would be necessary. Compliance with current CBC standards, seismic design parameters of the Structural Engineers Association of California, City standards, and site-specific geotechnical recommendations under the 25-foot Setback Alternative would ensure that impacts associated with geologic hazards would be less than significant and would be similar to those identified for the project. Further, as discussed in Section 5.2, *Geologic Conditions*, there is no potential for landslide impacts, and the on-site bluff conditions are stable and would not be susceptible to erosion and instability due to tsunamis. As analyzed in the Geology Report, the 25-foot setback was determined to be sufficient over the engineering lifespan of the project (CWE,

2022). Similar to the project, less-than-significant geologic hazard impacts would occur under the 25-foot Setback Alternative.

Soil erosion and sedimentation impacts could occur under this alternative during grading, excavation, and vegetation disturbance. Potential soil erosion impacts would be avoided or reduced to below a level of significance by required adherence to erosion control standards pursuant to applicable NPDES and related City regulations, which would require the use of appropriate BMPs to be implemented as part of City/NPDES stormwater standards.

As discussed in Section 5.2, *Geologic Hazards*, soil materials at the project site are relatively competent and are not anticipated to be subject to liquefaction due to such factors as soil density, grain-size distribution, and the absence of shallow groundwater. The majority of the surficial soils at the site possess a low to moderate expansive potential. The existing potentially compressible fill materials and uppermost portions of the old paralic deposits are considered unsuitable for the support of settlement-sensitive improvements. These unsuitable materials extend to a maximum estimated combined depth of about 9 feet below the existing grade. The incorporation of soil-specific recommendations from the site-specific geologic investigation would be required for the development of the 25-foot Setback Alternative. Approval of a final geotechnical investigation and incorporation of recommendations for a stable development would be required by and verified by the City prior to site development under this alternative, which would ensure potential impacts related to bluff stability and erosion remain less than significant. Impacts would be similar to those identified for the project and would be less than significant.

Historical Resources

This alternative would result in partial demolition of the residence, which is part of the City of San Diego Historic Site #1481, and construction of a second-story over remaining portion of the residence. Similar to the project, this alternative would retain the existing 499 SF historic garage and associated privacy stucco wall. Similar to the project, this alternative would require mitigation measures, such as HABS documentation, salvage, treatment plan, monitoring plan, and interpretive signage; however, since part of the structure would be demolished, the impact, while substantially reduced compared to the project, would remain significant.

In regard to archaeological resources, this alternative is not expected to result in direct impacts on subsurface archaeological resources, including religious or sacred uses or human remains. Impacts on subsurface archaeological resources would be the same under this alternative as those identified for the project and would be less than significant.

Hydrology

The 25-foot Setback Alternative would result in similar impervious surfaces at the site as compared to the project. Site improvements under the 25-foot Setback Alternative would include drainage improvements to alter the existing drainage pattern at the site and would be sized to accommodate expected flows. Similar to the project, this alternative would be designed to drain into a sump basin and would be pumped via an under-sidewalk drain to the Camino De La Costa public street right-of-way. Implementation of the project would require conformance with federal, State, and local regulations related to hydrology and drainage. Similar to the project, this alternative would result in less-than-significant hydrology and drainage impacts.

Water Quality

Demolition activities associated with the 25-foot Setback Alternative would result in the potential to affect water quality, similar to the project. As discussed in Section 5.5, *Water Quality*, erosion/sedimentation, the use and storage of construction-related hazardous materials (e.g., fuels, etc.), and generation of debris from demolition activities have the potential to affect water quality. As discussed for the project, activities occurring under the 25-foot Setback Alternative would require submitting a WPCP and implementing BMPs, and they would be conditioned to comply with the City's Storm Water Standards Manual and Grading Regulations. Similar to the project, this alternative would be required to comply with applicable water quality requirements, including those of the City and RWQCB, as well as other applicable federal, state, and local regulations. The City's LDR Engineering ensures compliance with the water quality standards through permit conditions. Impacts associated with pollutant discharge and local and regional water quality would be less than significant under the 25-foot Setback Alternative, the same as identified for the project.

8.5 Summary of Project Alternatives

The project alternatives discussed in this section are intended to avoid or substantially lessen one or more of the significant impacts identified for the project below a level of significance. A summary comparison of impact levels for the issues identified as significant under the project is provided in **Table 8-2**, *Project Alternatives Summary of Impacts*. Based on that information and the discussions in Sections 8.4.1 through 8.4.3, the No Project/No Development Alternative is the environmentally superior alternative, as it would eliminate all of the project impacts, including the significant and unavoidable land use and historical resources impacts. Pursuant to CEQA Guidelines Section 15126.6(e)(1), if the "no project" alternative is the environmentally superior alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. In this case, the On-Site Relocation and Partial Removal Alternative would be the environmentally superior alternative among the three remaining alternatives. Specifically, the On-Site Relocation and Partial Removal Alternative would retain the largest portion of the existing residence and would relocate the retained portion outside of the 40-foot coastal bluff setback. While this alternative would result in the partial retention of the existing historic structure, the partial removal and relocation would alter the integrity of the resource and would still result in a significant impacts to historical resources and the associated significant land use impact related to the conflict with historic preservation policy.

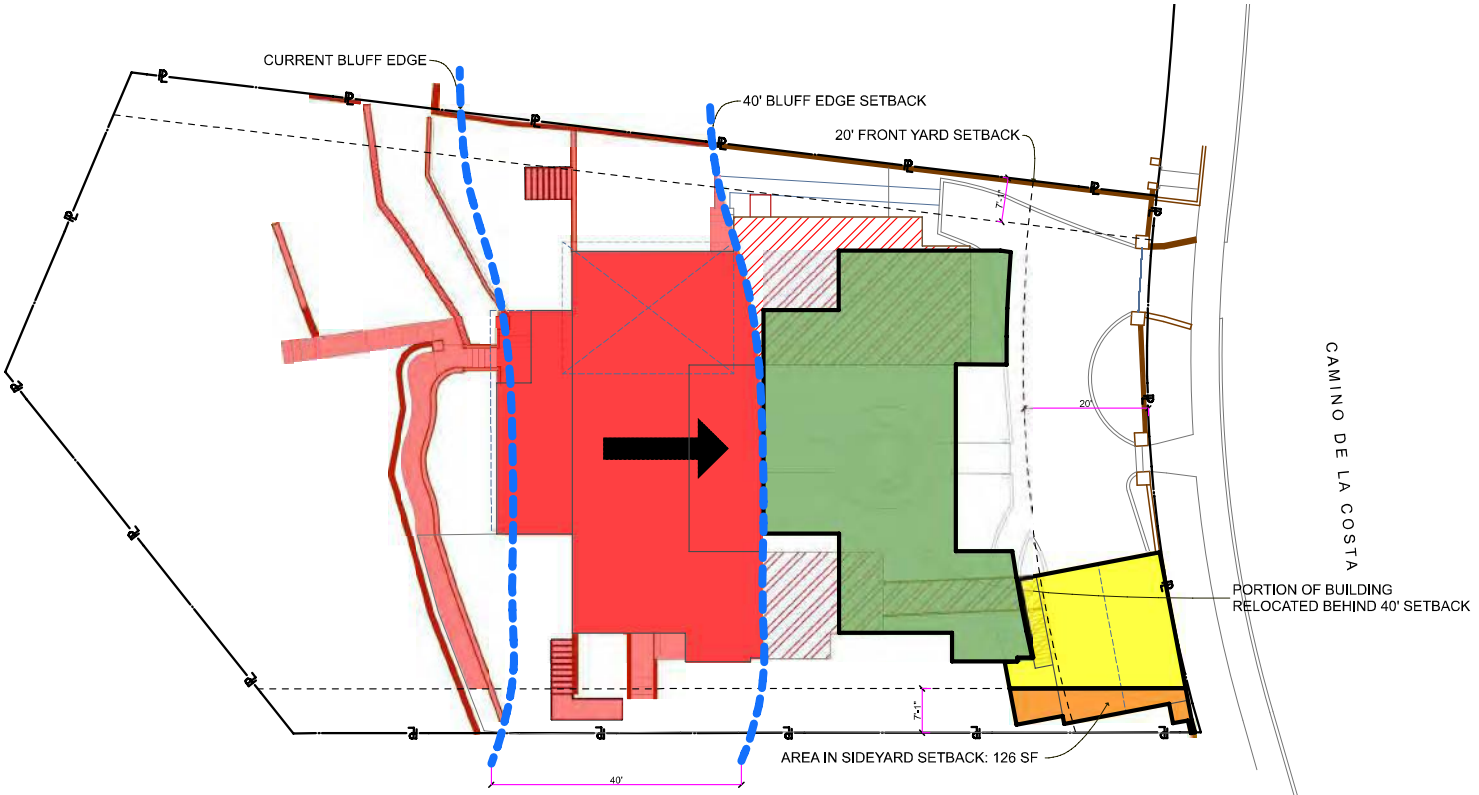
Table 8-2
PROJECT ALTERNATIVES SUMMARY OF IMPACTS

Environmental Issue[a]	Project	No Project/ No Development Alternative	On-Site Relocation and Partial Removal Alternative	On-Site Relocation and New Structure Alternative	25-foot Setback Alternative
Land Use	SU	N	SU-	SU-	SU
Geologic Conditions	LS	N	LS	LS	LS
Historical Resources	SU	N	SU-	SU-	SU
Hydrology	LS	N	LS	LS	LS
Water Quality	LS	N	LS	LS	LS

Notes:

[a] Only the environmental effects contained in Chapter 5 are included in this comparison matrix.

SU=significant and unavoidable; SM=significant but mitigable; LS=less than significant; N=no impact;
- = Less than the project; + = More than the project



REMOVED AREA TO COMPLY WITH COASTAL BLUFF EDGE SETBACK REQUIREMENTS

RELOCATED STRUCTURE FROM BLUFF EDGE SETBACK

AREA WITHIN COASTAL REQUIRED VIEW CORRIDOR

EXISTING STRUCTURE TO BE DEMOLISHED TO ALLOW FOR RELOCATED STRUCTURE TO BE ADAPTED INTO THE SITE

AREA OF HOUSE TO BE RETAINED WITHIN DEVELOPABLE AEA OUTSIDE BLUFF SETBACK

RELOCATED EXISTING PORTION OF STRUCTURE TO BEHIND 40' SETBACK

LOST SF OF HOME TO ADAPT RELOCATED STRUCTURE: 1,048 SF

RELOCATED PORTION LEVEL 1: 1482 SF+ BALCONY
RELOCATED BASEMENT: 1650 SF
RELOCATED LEVEL 2: 457 SQ FT

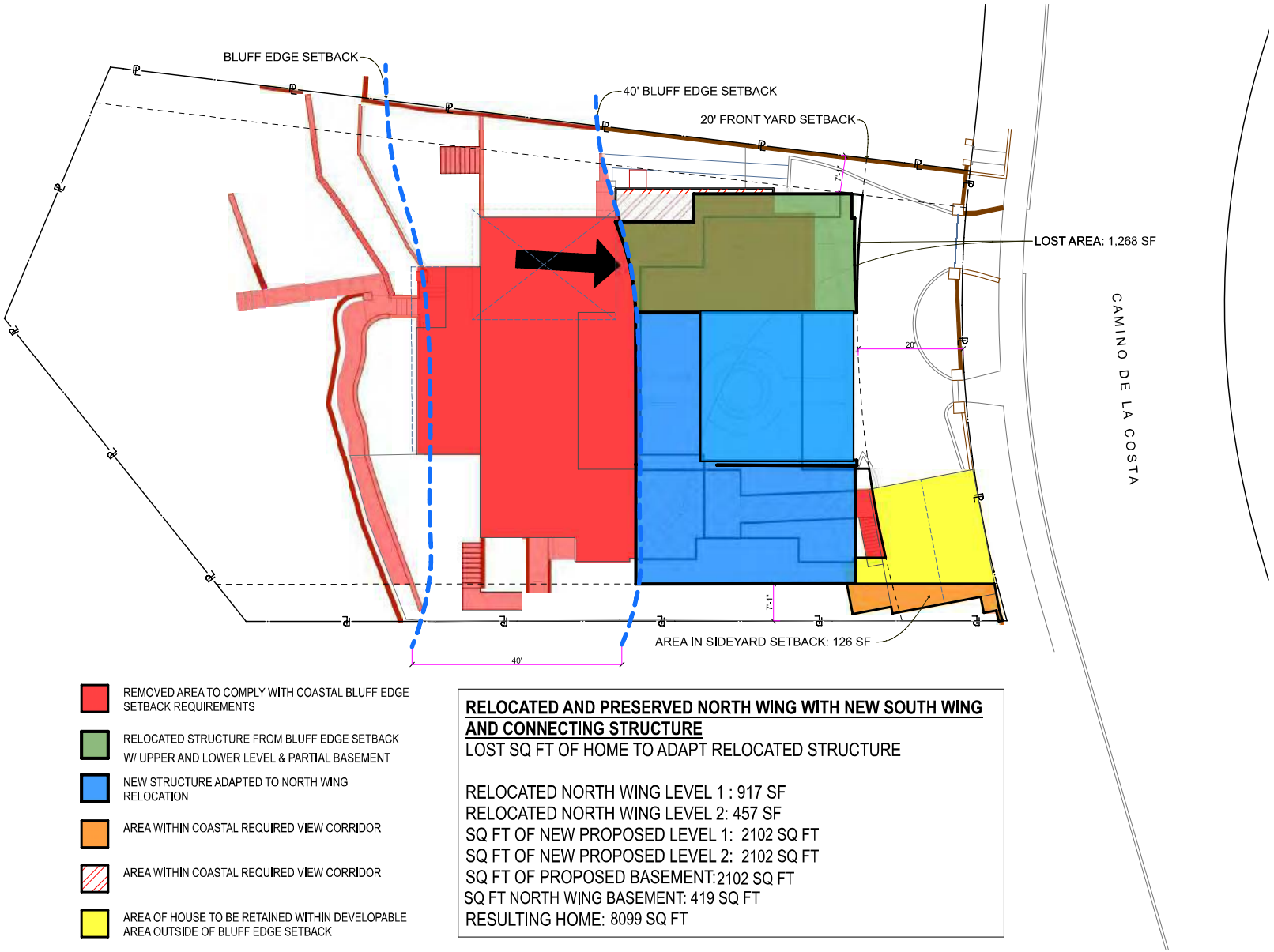
RESULTING HOME SF: 3994 SF

Source: Jonathan Segal, Architect 2023

Figure 8-1

On-Site Relocation and Partial Removal Alternative

CASA DE LOS AMIGOS

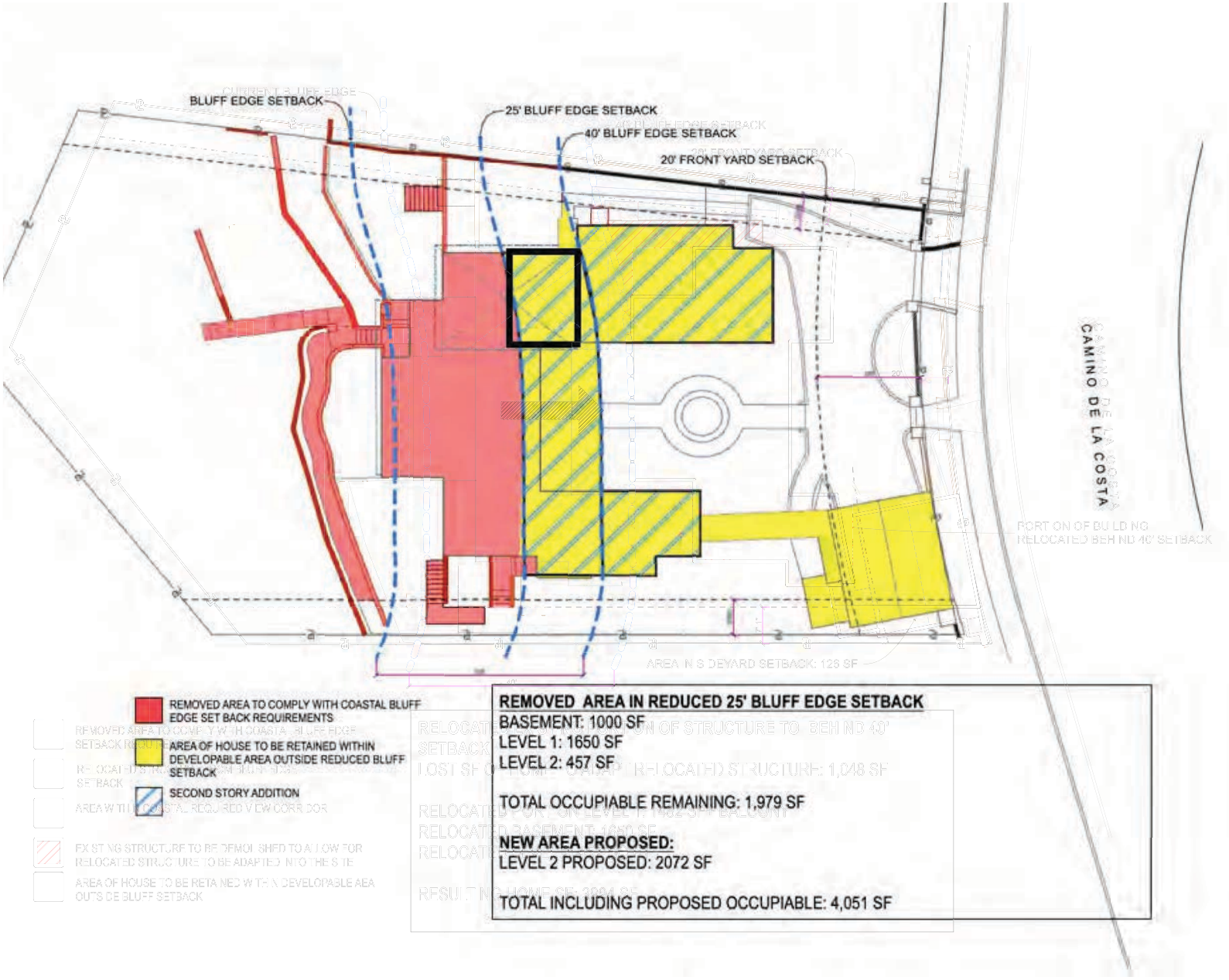


Source: Jonathan Segal, Architect 2023

Figure 8-2

On-Site Relocation and and New Structure Alternative

CASA DE LOS AMIGOS



Source: Jonathan Segal, Architect 2024

Figure 8-3

25-Foot Setback Alternative

CASA DE LOS AMIGOS

9. MITIGATION MONITORING AND REPORTING PROGRAM

9.1 General Requirements

As lead agency for the project under the California Environmental Quality Act, the City of San Diego will administer the Mitigation Monitoring and Reporting Program (MMRP) for the following environmental issue areas as identified in the 6110 Camino De La Costa Project EIR: Historical Resources. The mitigation measures identified below include all feasible measures from the 6110 Camino De La Costa Project EIR (SCH No. 2023070270 Project No. 1066101). This MMRP shall be made a requirement of project approval.

California Public Resources Code Section 21081.6 requires a lead or responsible agency that approves or carries out a project where an EIR has identified significant environmental effects to adopt a "reporting or monitoring program for adopted or required changes to mitigate or avoid significant environmental effects." The City of San Diego is the lead agency for the 6110 Camino De La Costa Project EIR and, therefore, must ensure the enforceability of the MMRP. An EIR has been prepared for this project that addresses potential environmental impacts and, where appropriate, recommends measures to mitigate these impacts. As such, an MMRP is required to ensure that adopted mitigation measures are implemented.

A. GENERAL REQUIREMENTS – PART I: Plan Check Phase (prior to permit issuance)

1. Prior to the issuance of a Notice to Proceed for a subdivision, or any construction permits, such as demolition, grading, or building, or beginning any construction-related activity on site, the Development Services Department (DSD) director's environmental designee (ED) shall review and approve all construction documents (CDs) (plans, specification, details, etc.) to ensure that MMRP requirements are incorporated into the design.
2. In addition, the ED shall verify that the MMRP conditions/notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading "**ENVIRONMENTAL/MITIGATION REQUIREMENTS**."
3. These notes must be shown within the first three sheets of the CDs in the format specified for engineering CD templates as shown on the City website:

   http://www.sandiego.gov/development-services/industry/standtemp.shtml

4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.
5. **SURETY AND COST RECOVERY:** The DSD director or city manager may require appropriate surety instruments or bonds from private permit holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

B. GENERAL REQUIREMENTS – PART II: Post Plan Check (after permit issuance/prior to start of construction)

1. **PRE CONSTRUCTION MEETING IS REQUIRED 10 WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the permit holder's representative(s), job site superintendent, and the following consultants:

   Qualified Historian

   Note: Failure of all responsible permit holder's representatives and consultants to attend shall require an additional meeting with all parties present.

   CONTACT INFORMATION:

   a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division – 858.627.3200**

   b) For Clarification of ENVIRONMENTAL REQUIREMENTS, applicant t is also required to call the **RE and MMC at 858.627.3360**

2. **MMRP COMPLIANCE:** This project, Project Tracking System No. 1066101 and/or Environmental Document No. 1066101, shall conform to the mitigation requirements contained in the associated environmental document and implemented to the satisfaction of the DSD's ED (MMC) and the city engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e., to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.).

   Note: Permit Holder's Representatives must alert the RE and MMC if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by the RE and MMC BEFORE the work is performed.

3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the permit holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution, or other documentation issued by the responsible agency:

   None Required

4. **MONITORING EXHIBITS:** All consultants are required to submit, to the RE and MMC, a monitoring exhibit on a 11x17-inch reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of that discipline's work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.

NOTE: Surety and Cost Recovery – When deemed necessary by the DSD director or city manager, additional surety instruments or bonds from the private permit holder may be required to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

5. **OTHER SUBMITTALS AND INSPECTIONS:** The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

Table 9-1
DOCUMENT SUBMITTAL/INSPECTION CHECKLIST

Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
Historical Resources	Historic American Building Survey Documentation	Prior to Demolition Permit
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

9.2 Specific MMRP Issue Area Conditions/Requirements

9.2.1 Historical Resources

HR-1: Historic American Building Survey (HABS) Documentation. Prior to issuance of a demolition permit for the residence, Casa De Los Amigos shall be documented to Historic American Building Survey (HABS) Level II standards according to the outline format described in the *Historic American Building Survey Guidelines for Preparing Written Historical Descriptive Data*. The documentation shall be undertaken by a qualified professional who meets the Secretary of the Interior's *Professional Qualification Standards* (36 CFR, part 61) for history or architectural history. The documentation shall contain the following:

1. *Measured Drawings:* Drawings produced according to HABS guidelines depicting existing conditions or other relevant features of historic buildings, sites, structures, objects, or landscapes.
2. *Photographic Documentation:* Documentation should follow the Photographic Specification–Historic American Building Survey, including 15 to 20 archival quality, large-format photographs of the exterior and interior of the building and its architectural elements. Construction techniques and architectural details should be documented, especially noting the measurements, hardware, and other features that tie architectural elements to a specific date.
3. *HABS Historical Report:* A written historical narrative and report completed according to the HABS Historical Report Guidelines.

Following completion of the HABS documentation and approval by the HRB, the documentation shall be placed on file with the City of San Diego, the San Diego History Center, and the San Diego Central Library.

HR-2: Salvage. Prior to the issuance of a demolition permit for the residence, architectural materials from the site shall be made available for donation to the public. Material to become architectural salvage shall include historic-period elements, including the original clay roof tiles and the decorative medallions at the roofline of the main structure. The key exterior and interior elements inventory shall be developed before the demolition or grading permit issuance. The materials shall be removed prior to or during demolition. Contaminated, unsound, or decayed materials shall not be included in the salvage program nor be available for future use. Once the items for salvage are identified, the project applicant's qualified historic preservation professional (QHPP) shall submit this information to the City's Historical Resource Section for approval. Salvaged material will be first used to replace any damaged pieces on the garage or site wall rehabilitation as required. Following approval of the salvage plan, the QHPP, in concert with the City's Historical Resources Section, shall notify the La Jolla Community Planning Group, the La Jolla Historic Society, the University of California, San Diego Historical Archives, and local preservation groups via email concerning the availability of the salvaged materials. Interested parties shall make arrangements to pick up the materials after they have been removed from the property. The project applicant shall be responsible for storing the salvaged materials in an appropriate climate-controlled storage space for no more than 90 days after proper notice is given to the above parties. Prior to any plans to no longer use the storage space, the applicant shall provide the City's Historical Resources Section with an inventory of any materials that were not donated to any interested parties and measures to be taken by the project applicant to dispose of these materials.

HR-3: Rehabilitation Work and Monitoring Plan. Rehabilitation of the garage and site wall shall be overseen by a construction monitor trained in the protection of historic structures. Rehabilitation work on the detached garage and stucco privacy wall shall adhere to *U.S. Secretary of the Interior Standards for Rehabilitation* and will be documented in a treatment plan. The treatment plan will consist of drawings detailing the rehabilitation work and an accompanying narrative approved by the HRB and City Heritage Preservation staff. Prior to the start of rehabilitation work, a monitoring plan shall be prepared by the project proponent and submitted to the City Development Services Department for review and approval. The monitoring plan shall designate a qualified historic monitor and set forth a plan for protecting the historic elements of the project that would be retained during construction and rehabilitation activities. The treatment plan and monitoring plan shall detail the proposed rehabilitation work for the project, with steps identified for each portion of the preparation, rehabilitation, and restoration of the detached garage and stucco privacy wall.

HR-4: Interpretation Plaque (or Display Panels or Story Board). Interpretive signage display panels or storyboards shall be installed in a publicly visible location, near the northern corner of the property, in the public sidewalk right-of-way. The installation shall describe the history and significance of Casa De Los Amigos under Criteria A, B, C, and D. The installation shall be reviewed and approved by the City's Historical Resources Board Staff.

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11. CERTIFICATION

This document has been completed by the City of San Diego's Environmental Analysis Section under the direction of the Development Services Department (DSD) Environmental Review Manager and is based on independent analysis and determinations made pursuant to the San Diego Municipal Code Section 128.0103. The following individuals contributed to the fieldwork and/or preparation of this report. Resumes of EIR and technical appendices preparers are on file and available for review at the City of San Diego, Development Services Department, 1222 First Avenue, Fifth Floor, San Diego, California 92101.

11.1 City of San Diego

Development Services Department

- Jeff Szymanski, Senior Planner
- Marlene Watanabe, Associated Planner
- Martin Mendez, Development Project Manager
- Jorge Casique, DSD-Planning
- Kreg Mills, DSD-Geology
- Anwer Ibriheem, DSD-Engineering
- Clare Gamelin, DSD-Landscape

Planning Department

- Suzanne Segur, Plan-Historic

11.2 EIR Preparer and Management

- Matthew Segal, AIA, Project Architect
- Chandra Slaven, AICP, Land Use Consultant

11.3 Technical Appendices Preparers

Preliminary Geotechnical Investigation – Christian Wheeler Engineering

- Daniel B. Adler, RCE #36037
- David R. Russell, CEG #2215

Wave-Run Study and Supplemental Geotechnical Review and Analysis – GeoSoils, Inc.

- John Franklin, CEG #1340

- Bryan Rodriguez, PG #9604

Treatment Plan – Jonathan Segal, FAIA

Historical Resources Technical Report – BFSA Environmental Services

- J.R.K. Stopes, M.S., RPA
- Brian F. Smith, M.A.

Climate Action Plan Consistency Checklist – JMAN Investments, Inc.

- Jonathan Segal, FAIA

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