ENVIRONMENTAL IMPACT REPORT

THE CITY OF SAN DIEGO

PRJ-0674401
SCH No. 2022040125

SUBJECT: **Renzulli Estates**: A COMMUNITY PLAN AMENDMENT to the Scripps Miramar Ranch Community Plan to redesignate the site from Residential and Open Space to Low Density Residential and to downgrade the segment of Cypress Canyon Road along the project site frontage from a two-lane collector to a two-lane sub-collector; a REZONE from Agricultural-Residential (AR)-1-1 to Residential–Small Lot (RX)-1-2, Residential-Multiple Unit (RM)-2-4, and Open Space Residential (OR)-1-2; VESTING TENTATIVE MAP to create new legal lots; a SITE DEVELOPMENT PERMIT to develop within Environmentally Sensitive Lands; NEIGHBORHOOD DEVELOPMENT PERMIT for deviations related to building height, retaining wall height, and driveway widths; Multi-Habitat Planning Area (MHPA) BOUNDARY LINE ADJUSTMENT to remove the proposed development footprint from the MHPA and add in an equivalent area; RIGHT-OF-WAY VACATION of the existing paper right-of-way for Lakehurst Avenue within the off-site MHPA addition area. The project proposes the demolition of the existing residential unit and supporting structures, grading, and development of 100 single-family homes and 12 multi-family affordable units. In addition, the proposed project would preserve 24.47 acres on site within the MHPA, as well as 18.7 acres off site located east of Regents Road and west of Pocahontas Avenue. The project also includes landscaping, brush management, parking, access, and utility improvements. Allowable deviations from development standards are proposed related to building height, retaining wall, and driveway width. The approximately 40.56-acre project site is located at 11495 Cypress Canyon Road. The General Plan designates the site as Residential and Park, Open Space and Recreation. Per the Scripps Miramar Ranch Community Plan, the site's land use designation is Residential and Open Space and the zone is AR-1-1. (ASSESSOR'S PARCEL NUMBER: 319-020-04-00.) The project site, under the name Cyprus Canyon, is on the hazardous site list compiled pursuant to Section 65962.5 of the Government Code. Applicant: Green Phair Scripps Partners LLC.

ENVIRONMENTAL DETERMINATION:

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

Based on the analysis conducted for the project described above, the City of San Diego, as the Lead Agency, has prepared the following Environmental Impact Report. The analysis addressed the following issue area(s) in detail: **Land Use, Transportation, Air Quality and Odor, Biological Resources, Energy, Geologic Conditions, Greenhouse Gas Emissions, Health and Safety, Historical Resources, Hydrology, Noise, Paleontological Resources, Population and Housing, Public Services and Facilities, Public Utilities, Tribal Cultural Resources, Visual Effects/ Neighborhood Character, Water Quality, Wildfire** and **Cumulative.** The EIR concluded that project impacts to **Air Quality, Biological Resources,** and **Noise** would be mitigated to below a level of significance. However, **Land Use, Transportation, Greenhouse Gas Emissions, and Visual Effects and Neighborhood Character** impacts were concluded to be significant and unmitigated. All other impacts analyzed in the Draft EIR were either determined to have no impact or be less than significant.

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

PUBLIC REVIEW DISTRIBUTION:

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

Federal Government
U.S. Environmental Protection Agency (19)
U.S. Fish and Wildlife Service (23)
U.S. Army Corps of Engineers (16&26)

State of California
California Department of Transportation (31)
California Department of Fish and Wildlife (32)
California Environmental Protection Agency (37)
Dept of Toxic Substance Control, Region 1 (39)
California Regional Water Quality Control Board, Region 9 (44)
State Clearinghouse (46A)
California Department of Transportation (51)
California Transportation Commission (51A)
California Transportation Commission (51B)
Native American Heritage Commission (56)
Office of Planning and Research (50)
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California Department of Fish and Wildlife, Alison Kalinowski
California Department of Fish and Wildlife, Jennifer Ludovissy
Native American Heritage Commission, Andrew Green

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County of San Diego Department of Environmental Health (76)

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    MSCP Planning
Parks and Recreation Department
    Open Space
Economic Development
    Real Estate Assets
San Diego Police Department (MS776)
San Diego Fire-Rescue (MS603)
Transportation Development - DSD (78)
Development Coordination (78A)
Fire and Life Safety Services (79)
San Diego Fire - Rescue Dept Logistics (80)
Central Library (81A)
Scripps Miramar Ranch Branch Library (81FF)
Historical Resources Board (87)
Environmental Services (93A)
City Attorney (93C)

Other Interested Groups, Organizations, and Individuals
SANDAG (108)
San Diego Metropolitan Transit System (112)
San Diego Unified School District (132)
University of California San Diego Library (134)
Daily Transcript (135)
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National History Museum (213)
Save Our Heritage Organisation (214)
Ron Christman (215)
Clint Linton (215B)
Frank Brown – Inter-Tribal Cultural Resources Council (216)
Campo Band of Mission Indians (217)
San Diego County Archaeological Society, Inc. (218)
Native American Heritage Commission (222)
Kumeyaay Cultural Heritage Preservation (223)
Kumeyaay Cultural Repatriation Committee (225)
Native American Distribution (225 A-S)
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San Pasqual Tribe, John Flores
Ray Teran, Viejas Band of Kumeyaay Indians
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Scripps Ranch Planning Group (437)
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Miramar Ranch North Planning Committee (439)
Scripps Ranch Civic Association (440)
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Tony Gogoi
Tracy
Vicki Sanders
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Jeff Phair, Applicant
Austin Dias, Applicant
Erin Lucett, Environmental Consultant

RESULTS OF PUBLIC REVIEW:

☐ No comments were received during the public input period.

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

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

Copies of the environmental document and associated project-specific technical appendices, if any, may be accessed on the City of San Diego's California Environmental Quality Act (CEQA) webpage at https://www.sandiego.gov/ceqa.



Elizabeth Shearer-Nguyen
Program Manager
Development Services Department

August 21, 2025
Date of Draft Report

Date of Final Report

Analyst: D. Marshall

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L1 Fire Service Letter
L2 Police Service Letter
L3 Fire Fuel Load Modeling Report
M1 Public Water System Analysis
M2 Public Sewer System Analysis
M3 Waste Management Plan
N Conceptual Wildfire Evacuation Plan

INTENTIONALLY LEFT BLANK

Acronym/Abbreviation	Definition
AB	Assembly Bill
ACM	asbestos-containing material
ADA	Americans with Disabilities Act
AERMOD	American Meteorological Society/EPA Regulatory Model
AFY	acre-feet per year
ALUCP	airport land use compatibility plan
amsl	above mean sea level
AR	Agricultural–Residential
ATCM	Airborne Toxic Control Measure
BLA	boundary line adjustment
BMP	best management practice
BMZ	brush management zone
C&D	Construction and Demolition
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Occupational Safety and Health Administration
CalARP	California Accidental Release Prevention
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFC	California Fire Code
CFR	Code of Federal Regulations
CH_4	methane
CHSP	community health safety plan
City	City of San Diego
CNEL	community noise equivalent level
CNMP	Construction Noise Management Plan
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
COC	contaminant of concern
Community Plan	Scripps Miramar Ranch Community Plan
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CWA	Clean Water Act
cy	cubic yards

Acronym/Abbreviation	Definition
dB	decibels
dBA	A-weighted decibels
DEHQ	Department of Environmental Health and Quality
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
du/ac	dwelling units per acre
EIR	environmental impact report
EISA	Energy Independence and Security Act
EO	Executive Order
EOC	Emergency Operations Center
EOP	Emergency Operations Plan
EPA	U.S. Environmental Protection Agency
ESA	federal Endangered Species Act
ESD	Environmental Services Department
ESL	Environmentally Sensitive Lands
EV	electric vehicle
FFLMR	fire fuel load modeling report
FHSZ	Fire Hazard Severity Zone
GHG	greenhouse gas
gpd	gallons per day
gpm	gallons per minute
GWP	global warming potential
HA	hydrologic area
HERO	Human and Ecological Risk Office
HFC	hydrofluorocarbon
HRA	health risk assessment
I	Interstate
IFC	International Fire Code
ips	inches per second
kWh	kilowatt-hour
LBP	lead-based paint
L_{eq}	equivalent sound level
LUAG	Land Use Adjacency Guidelines
MCAS	Marine Corps Air Station
mgd	million gallons per day
MHMP	Multi-Jurisdictional Hazard Mitigation Plan
MHPA	Multi-Habitat Planning Area
MLD	most likely descendant
MM	Mitigation Measure
mph	miles per hour
MRZ	mineral resource zone
MS4	municipal separate storm sewer system
MSCP	Multiple Species Conservation Program
MT	metric ton
MWD	Metropolitan Water District of Southern California

Acronym/Abbreviation	Definition
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NHTSA	National Highway Traffic Safety Administration
NO_2	nitrogen dioxide
NOP	notice of preparation
NO_x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O_3	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OPLA-PRP	Omnibus Public Lands Act–Paleontological Resources Preservation
PFFP	Public Facilities Financing Plan
PM_{10}	particulate matter less than or equal to 10 microns in diameter
$PM_{2.5}$	particulate matter less than or equal to 2.5 microns in diameter
PPV	peak particle velocity
PRC	California Public Resources Code
project	Renzulli Estates Project
psi	pounds per square inch
PUD	Public Utilities Department
PV	photovoltaic
RAQS	Regional Air Quality Strategy
RAQS	Regional Air Quality Strategy
RCRA	Resource Conservation and Recovery Act
Regional Plan	San Diego Forward: The Regional Plan
RFS	Renewable Fuel Standard
RHNA	regional housing needs assessment
ROW	right-of-way
RPS	Renewables Portfolio Standard
RSL	regional screening level
RTP	regional transportation plan
RWQCB	Regional Water Quality Control Board
RX	Residential–Small Lot
SANDAG	San Diego Association of Governments
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCS	sustainable communities strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDCWA	San Diego County Water Authority
SDFD	San Diego Fire–Rescue Department
SDG&E	San Diego Gas & Electric Company
SDMC	San Diego Municipal Code
SDNHM	San Diego Natural History Museum
SDPD	San Diego Police Department

Acronym/Abbreviation	Definition
SDUSD	San Diego Unified School District
SIP	state implementation plan
SLCP	short-lived climate pollutant
SLM	sound level meter
SMP	soil management plan
SO_2	sulfur dioxide
SoCalGas	Southern California Gas
ST	short-term
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCR	tribal cultural resource
TPH	total petroleum hydrocarbons
TSM	Transportation Study Manual
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
VOC	volatile organic compound
WDR	waste discharge requirement
WMA	Watershed Management Area
WMP	waste management plan
WTP	Wastewater Treatment Plant
WUI	wildland–urban interface
ZEV	zero emission vehicle

EXECUTIVE SUMMARY

This environmental impact report (EIR) has been prepared for the Renzulli Estates Project (project). This document analyzes the potential environmental effects associated with the implementation of the project. The EIR was prepared under the direction of the City of San Diego's (City's) Environmental Analysis Section and reflects the independent judgment of the City as lead agency pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC], Section 21000 et seq.), the CEQA Guidelines (14 CCR 15000 et seq.), City of San Diego CEQA Significance Determination Thresholds (City of San Diego 2022), and the City of San Diego Environmental Impact Report Guidelines (City of San Diego 2005). This EIR was prepared to evaluate the environmental effects of the project.

ES.1 PURPOSE AND SCOPE OF THE EIR

This EIR has been prepared in accordance with, and complies with the criteria, standards, and procedures of CEQA (PRC Section 21000 et seq.), the CEQA Guidelines (14 CCR 15000 et seq.), City of San Diego CEQA Significance Determination Thresholds (City of San Diego 2022), and the City's EIR Guidelines (City of San Diego 2005). Per Section 21067 of CEQA and Sections 15367 and 15050 through 15053 of the CEQA Guidelines, the City is the lead agency under whose authority this document has been prepared. As an informational document, this EIR is intended for use by City decision-makers and members of the general public in evaluating the potential environmental effects of the project.

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

ES.2 PROJECT LOCATION AND SETTING

The project would be located on an approximately 40.56-acre site, at 11495 Cypress Canyon Road (Assessor's Parcel Number 319-020-04-00; project site) in San Diego, within the Scripps Miramar Ranch Community Plan (Community Plan) Area. The project site is surrounded by existing residential development that is mostly single-family to the north, west, and northeast; multi-family residential development to the southeast; undeveloped open space (including a canyon and intermittent creek)

to the south; and Cypress Canyon Park to the east. The northwestern and southeastern corners of the project site border Cypress Canyon Road. Additionally, the project is approximately 2.5 miles east of Interstate 15, 0.5 miles south of Scripps Poway Parkway, 0.1 miles west of Cypress Canyon Park Drive, and 0.1 miles north of Spring Canyon Road in the northeast portion of the City (Figure 2-1, Project Location).

The majority of the project site is undeveloped, with some development present in the center of the site. More specifically, the project site supports a large existing residence, one associated shed located in the center of the project site, as well as a second shed, located north of the residence. The structures are accessible via the segment of Cypress Canyon Road which connects to Cypress Canyon Park Drive to the southeast. In addition, two three-car garages and various abandoned vehicles, RVs, and trailers are located within the center of the project site, near the existing residence. There is an additional large metal building (approximately 5,000 square feet) located approximately 400 feet north of the main house. The metal building is in a canyon, approximately 90 feet lower in elevation than the main house. Additionally, there is a cleared area in the center of the site. Various unpaved roads are also scattered throughout the project site. The Multi-Habitat Planning Area (MHPA), the hardline preserve developed by the City and established by the San Diego Multiple Species Conservation Program, covers most of the project site.

A total of 13 vegetation communities are located on the project site, 6 of which are native vegetation communities. Additionally, the project site contains human-made wetland habitat including emergent wetland, herbaceous wetland (artificial), and natural flood channels. None of the wetlands are considered City wetlands, as they are human-made.

ES.3 PROJECT OBJECTIVES

The underlying purpose of the project is to provide a housing development on an underutilized infill site within the community of Scripps Miramar Ranch, in San Diego, California. Project implementation would be guided by the following project objectives:

1. Redevelop an underutilized site to contribute housing to the City in response to regional housing needs.
2. Construct a variety of housing types at a density range that maximizes development potential consistent with the surrounding residential communities.
3. Provide additional affordable housing units to assist in meeting state and local needs.
4. Provide street improvements to connect the current termini of Cypress Canyon Road through the project site.

5. Implement a housing project that integrates with the Scripps Miramar Ranch community and has a cohesive design that is compatible in use, scale, and character with the surroundings.
6. Integrate the project into the existing topography of the site and cluster development in a manner that reduces the grading footprint as well as impacts to environmental resources, and maximizes the preservation of the most biologically valuable resources on the project site.

ES.4 PROJECT DESCRIPTION

The project would consist of the demolition of an existing residential unit and supporting structures, grading, and the construction of 100 single-family homes and 12 multi-family affordable income rental units (multi-family units).

The single-family homes would be two stories and a maximum of 35 feet. Additionally, the multi-family building would be three stories and with a maximum height of 40 feet. The project is requesting a deviation from the San Diego Municipal Code (SDMC) to increase the height limit for development within the Residential–Small Lot (RX)-1-2 zone from 30 feet to 35 feet for the proposed buildings and from 30 feet to 36 feet for the proposed retaining wall Additionally, the project proposes a deviation from SDMC Section 142.0560(j)(1), Tables 142-05N and 142-05M, which identifies the minimum required and maximum allowed driveway widths (outside a Parking Impact Overlay Zone) for a detached single dwelling unit (lot widths 50 feet or less) as 12 feet and 20 feet, respectively, and for a detached single dwelling unit (lot widths greater than 50 feet) as 12 feet and 25 feet, respectively. Additionally, per standard drawing SDG-164, which is referred to in SDMC Section 142.0560(j)(3), curb openings shall not exceed 40% of the property frontage. Although the proposed 16-foot-wide driveway falls within the driveway width allowed, a deviation is requested due to the proposed 22-foot-wide (16-foot driveway plus 3-foot flare on each side) curb opening exceeding the 40% max frontage for a curb opening of any lot less than 55 feet wide, which would be 91 of the 100 total single-family residential lots in this subdivision. The project would also require a Community Plan Amendment to downgrade the segment of Cypress Canyon Road along the project site frontage from a two-lane collector to a two-lane sub-collector. The project would include two chokers on Cypress Canyon Road at the northwest and southeast entrances to the project as traffic calming measures to slow down vehicular traffic.

The project includes 20.42 acres of open space within the MHPA and 0.14 acres outside of the MHPA within the project site. The on-site open space area would remain within the MHPA following construction and be dedicated in fee title to the City upon successful completion of restoration activities. Within the open space area, undeveloped manufactured slopes would be restored on the project site and would remain or be added into the MHPA. On-site restoration of upland habitat would total 11.38 acres (10.25 acres is included as part of **Mitigation Measure [MM] BIO-1**), consisting of 0.54 acres of scrub oak chaparral, 5.46 acres of Diegan coastal sage scrub (0.89 acres of

which is not given compensatory mitigation credit), 4.75 acres of coastal sage-chaparral (0.24 acres of which is not given compensatory mitigation credit), and 0.63 acres of southern mixed chaparral; the restoration would also include translocation of 520 Nuttall's scrub oak (*Quercus dumosa*), 26 Del Mar manzanita (*Arctostaphylos glandulosa* ssp. *crassifolia*), and 92 barrel cacti (*Echinocactus*).

The City's MHPA currently overlaps with a substantial portion of the project site. An MHPA boundary line adjustment (BLA) is proposed to remove the proposed development footprint (and associated stormwater infrastructure) from the MHPA. A portion of the proposed grading and fill activities would occur within the remaining MHPA in order to construct manufactured slope areas that would be revegetated with native species and managed in a manner consistent with MHPA standards. With approval of the BLA, the proposed development footprint would not overlap with the MHPA boundary and would only occur adjacent to the MHPA. As part of the BLA, the project proposes the addition of areas located on site and off site, which would be incorporated into the City's MHPA preserve boundary to account for loss of MHPA areas. The proposed off-site MHPA BLA addition site is located within the City east of Regents Road and west of Pocahontas Avenue. In addition, a right-of-way vacation would be processed for the off-site MHPA addition area as part of the project for the section of the planned Lakehurst Avenue right-of-way (not yet built).

The project would include a landscape plan with drought-tolerant native vegetation and low water use plants. The landscape plan would not include invasive plant species, as identified by the California Invasive Plant Council. Brush management zones would be provided around all new single-family and multi-family development lots within the project development that are adjacent to open space areas.

The project's circulation system is designed to interconnect with the existing adjacent public street system to be consistent with the Community Plan. Upon completion, access to the project site would be provided via Cypress Canyon Road from the southeast and northwest.

Utility improvements would include new water and wastewater connections from the project to the existing systems. The project would include storm drains, curb inlets, and cleanouts along all proposed roads and parking spaces on site to collect and convey storm runoff. The majority of runoff generated by the project would be conveyed and treated into two proposed biofiltration basins, then conveyed to the existing system. Electrical power and natural gas would be provided by San Diego Gas & Electric.

ES.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES THAT REDUCE OR AVOID SIGNIFICANT IMPACTS

Tables ES-1, located at the end of this section, summarizes the results of the environmental analysis completed for the project pursuant to the CEQA Guidelines Section 15123(b)(1). Table ES-1 identifies

the significant impacts and mitigation measures to reduce and/or avoid significant environmental effects, and concludes whether the impact would be mitigated to below a level of significance with implementation of mitigation measures. The mitigation measures listed in Table ES-1 are also discussed within each relevant topic area and fully contained in Mitigation Monitoring and Reporting Program.

As shown in Table ES-1, impacts related to land use (Climate Action Plan), transportation (vehicles miles traveled), greenhouse gas emissions (Climate Action Plan), and visual effects and neighborhood character (Landform Alteration) would be significant even with mitigation. Following the implementation of mitigation measures, impacts related to air quality, biological resources, and noise would be reduced to a level below significance.

Additionally, cumulative impacts associated with land use, transportation and greenhouse gas emissions would be significant and unavoidable.

ES.6 AREAS OF CONTROVERSY

Pursuant to CEQA Section 15123(b)(2), an EIR shall identify areas of controversy known to the lead agency, including issues raised by the agencies, and the public, and issues to be resolved. The Notice of Preparation for the EIR was distributed on April 06, 2022, for a 30-day public review and comment period, and a pre-recorded presentation was made accessible to the public and available for viewing from April 06, 2022, to May 06, 2022. Public comments were received on the Notice of Preparation that reflect controversy on several environmental issues.

Issues of controversy raised include concerns related to cultural and historical resources, transportation and traffic, biological resources, evacuation, air quality, and noise impacts. The Notice of Preparation, comment letter, and public scoping meeting transcript are included in this EIR as Appendix A.

ES.7 ISSUES TO BE RESOLVED BY THE DECISION-MAKING BODY

The City Council must review the project and this EIR and determine if the project or one of the alternatives presented in Chapter 9 should be adopted and implemented. If the project is selected for adoption, the City Council will be required to certify the EIR, determine whether and how to mitigate significant impacts, and adopt associated Findings of Fact pursuant to CEQA Guidelines Section 15091 for the following significant impacts identified in the EIR:

- Air Quality and Odor
- Biological Resources
- Noise

Furthermore, a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093 would be required for those impacts found to be to be significant and unmitigable identified in the EIR:

- Land Use
- Transportation
- Greenhouse Gas Emissions
- Visual Effects and Neighborhood Character

ES.8 PROJECT ALTERNATIVES

CEQA requires that EIRs contain an analysis of alternatives to the project that would avoid or substantially lessen environmental impacts. Section 15126.6(a) of the CEQA Guidelines states that an EIR should "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (14 CCR 15000 et seq.). The EIR is not required to address every possible alternative. The selection of alternatives is governed by a "rule of reason" that requires an EIR to evaluate only those alternatives necessary to permit a reasoned choice (Section 15126.6[f]). The EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons for that determination (Section 15126.6[c]). Additionally, CEQA requires discussion of a No Project Alternative to give decision makers the ability to compare the impacts of approving the project with those of not approving the project (Section 15126.6[e]). Per CEQA Guidelines, Sections 15126.6 (b) and (c), the focus of this analysis is to determine (1) whether alternatives are capable of avoiding or substantially lessening the significant environmental effects of the project, (2) the feasibility of alternatives, and (3) whether an alternative meets all or most of the basic project objectives. This chapter focuses on those alternatives that are capable of reducing or eliminating significant environmental impacts, even if they would impede the attainment of some project objectives or would be more costly. In accordance with Section 15126(f)(1) of the CEQA Guidelines, the factors that may be taken into account when addressing the feasibility of alternatives are site suitability; economic viability; availability of infrastructure; general plan consistency; other plans or regulatory limitations; jurisdictional boundaries; and whether the project proponent can reasonably acquire, control, or otherwise have access to an alternative site.

Pursuant to the CEQA Guidelines, a range of alternatives for the Renzulli Estates Project (project) is considered in this EIR. The discussion in this section provides a description of the alternatives considered, feasibility of the alternatives, and an analysis of whether the alternatives meet most of

the objectives of the project. The alternatives analysis culminates to identify the environmentally superior project consistent with CEQA Guidelines Section 15126.6(e)(2). The environmentally superior alternative is chosen based on the consideration of several factors, including the project's objectives and the ability to fulfill the goals while reducing potential impacts to the environment.

ES.8.1 NO PROJECT/NO DEVELOPMENT ALTERNATIVE

Under the No Project/No Development Alternative, the project would not be implemented and the site would remain in its current condition. The existing site is primarily undeveloped with the exception of a single-family residential unit, several outbuildings, and a road to the residential unit that connects to Cypress Canyon Road. The site would remain zoned as Agricultural–Residential (AR) 1-1 zone, and the City's MHPA boundary would remain as is, covering 33.4 acres of the project site. Under this alternative, none of the direct or indirect environmental impacts associated with the construction and operation would occur.

ES.8.2 NO PROJECT/ DEVELOPMENT UNDER EXISTING ZONING ALTERNATIVE

The Development Under the Existing Zoning Alternative would be consistent with the existing zoning of the project site, Agricultural–Residential (AR)-1-1. This alternative assumes the maximum buildout of the project site given the existing AR-1-1 zoning designation density of 1 dwelling unit per 10 acres. Given the approximately 40.56-acre size of the project site, this alternative would allow for the construction of up to four single-family residential units. It is assumed that the residential units would be centered within the interior portion of the property, and the portions of the project site that are currently designated as open space are assumed to be undeveloped. Grading and development of this alternative would occur only in the area designated for residential use and, therefore, would be reduced compared to the proposed project. Compared to the proposed project, this would reduce the number of single-family homes from 100 to 4 units and would not allow any multifamily residential units. The Development Under the Existing Zoning Alternative would not include any affordable housing units and would not be subject to the Inclusionary Affordable Housing Ordinance because it would develop fewer than 10 units.

This Development Under the Existing Zoning Alternative would require a Vesting Tentative Map, Site Development Permit, and MHPA BLA, similar to the proposed project, but it would not require a Community Plan Amendment, Neighborhood Development Permit, or rezone.

This alternative would reduce significant impacts to land use, transportation, air quality, greenhouse gas emissions, noise, and visual effect and neighborhood character to less than significant and would not require implementation of the associated mitigation measures. Impacts associated with biological resources would remain less than significant with mitigation but would be reduced compared to the proposed project. Impacts related to energy, geologic conditions, historical

resources, hydrology, paleontological resources, population and housing, public services and facilities, and public utilities would be reduced as compared to the project. Impacts to health and safety, tribal cultural resources, water quality, and wildfire would be similar to the proposed project.

This alternative would meet Objectives 1 and 5 by redeveloping the same site as the proposed project with housing, although with fewer units. By reducing the number of units, this alternative would not provide affordable multifamily units with a range of housing types and would not meet Objectives 2 or 3. This alternative would meet Objective 4 by implementing street improvements. Objective 6 would also be met by maximizing the preservation of biological resources by maintaining the existing open space. The Development Under the Existing Zoning Alternative would meet four out of six project objectives.

ES.8.3 DEVELOPMENT UNDER EXISTING COMMUNITY PLAN ALTERNATIVE

The Development under the Existing Community Plan Alternative would be consistent with the existing Community Plan. This alternative assumes the maximum buildout of the project site given the existing Community Plan designations for the site. The Community Plan designates the project site as open space and single-family residential. Specifically, 25.57 acres of the site are designated as open space, and 15.03 acres are designated for residential use. The residential designation has a density of 3 to 5 dwelling units per acre and a maximum of 45 units, resulting in a density of 1.1 dwelling units per acre (Scripps Miramar Ranch Planning Committee et al. 2018). This alternative assumes a maximum of 45 units. The areas designated as open space are assumed to be undeveloped. Therefore, grading and development would only occur in the area designated as residential use and would be less than the proposed project. Compared to the proposed project, this would reduce the number of single-family homes from 100 to 45 units and would not allow any multi-family residential units. In accordance with the Inclusionary Affordable Housing Ordinance, 10% of units would be affordable housing units. Similar to the project, Cypress Canyon Road would also be extended through the project site under this alternative, and the off-site BLA addition area would be a part of the alternative project.

This Development Under the Existing Community Plan alternative would require a Rezone, Vesting Tentative Map, Site Development Permit, and MHPA BLA, similar to the proposed project, but it would not require a Rezone, Community Plan Amendment, or Neighborhood Development Permit.

This alternative would reduce impacts to land use, air quality, biological resources, and greenhouse gas emissions to less than significant but does not reduce the need for mitigation measures. Impacts associated with noise would be reduced and not require mitigation. Impacts associated with energy, paleontological resources, population and housing, public services and facilities, public utilities, and visual effect and neighborhood character would be reduced when compared to the

project. Although reduced under this alternative, impacts to transportation would still be significant and unavoidable. Impacts to geologic conditions, health and safety, historical resources, hydrology, tribal cultural resources, water quality, and wildfire would be similar to the proposed project.

The Development Under Existing Community Plan Alternative would not meet all of the project objectives to the same extent as the proposed project. By reducing the number of units, the alternative would not provide multifamily units with a range of housing types or provide affordable housing (Objectives 2). The Development Under the Existing Community Plan Alternative would meet five out of six project objectives.

ES.8.4 REDUCED FOOTPRINT ALTERNATIVE

The Reduced Footprint Alternative would result in the development of 7.76 acres on site focused on the portion of the site that has been previously disturbed and developed. The purpose of this alternative is to reduce biological resource impacts to Tier I-III vegetation communities. In addition, in order to accommodate 112 units within the reduced footprint, the Reduced Footprint Alternative would result in an increase in density at the project site from 2.7 dwelling units per acre, under the proposed project, to 14.4 dwelling units per acre. Therefore, the proposed residential uses would be developed as multi-family.

The same discretionary actions as required for the project would also be required for this alternative, and a Right-of-Way vacation of the existing unpaved Right-of-Way at the off-site MHPA BLA addition area. Discretionary approvals for this alternative would include a Rezone, Community Plan Amendment, MHPA BLA, Site Development Permit, and Neighborhood Development Permit. In addition, a height deviation request would need to be increased in comparison to the proposed project to account for the smaller footprint.

Under this alternative, impacts associated with land use, transportation, and greenhouse gas emissions would require mitigation and would remain significant and avoidable. However, impacts related to transportation and greenhouse gas emissions would be reduced when compared to the project. Impacts associated with air quality, biological resources, and noise would be reduced under this alternative but would still require mitigation. Impacts associated with energy, historical resources, hydrology, paleontological resources, public utilities, tribal cultural resources, and visual effect and neighborhood character (landform alteration) would be reduced when compared to the project. Impacts to visual effect and neighborhood character (landform alteration) would be reduced to less than significant under this alternative. Impacts to geologic conditions, greenhouse gas emissions, health and safety, population and housing, public services and facilities, water quality, and wildfire would be similar to the proposed project.

The Reduced Footprint Alternative would not meet all of the project objectives to the same extent as the proposed project. By limiting the housing types to only multifamily residential, the alternative would not construct a variety of housing types at a density range that maximizes development potential consistent with the surrounding residential communities and would not meet Objective 2. The Reduced Footprint Alternative would meet five out of six project objectives.

ES.8.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The No Project/No Development Alternative would have the fewest impacts. Under this alternative, however, none of the project objectives would be met. Section 15126.6(e)(2) of the CEQA Guidelines states that if the No Project Alternative is the environmentally superior alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives. Thus, the environmentally superior alternative would be the Development Under Existing Zoning Alternative. The Development Under Existing Zoning Alternative would avoid the project's significant and unavoidable impact related to transportation, land use, GHG, and visual effects, and would meet four out of six project objectives.

ES.9 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Table ES-1
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measures	Level of Significance After Mitigation
	Land Use	
Due to inconsistencies with the City's Climate Action Plan (CAP), the project would result in a significant impact (Impact LND-1).	The project would not be consistent with the CAP because the project is inconsistent with the land use assumptions and greenhouse gas emissions assumed in the CAP for the project site. The project would implement MM-GHG-1 through MM-GHG-3 to reduce potential GHG emissions associated with the project to the extent feasible. While the proposed mitigation measures would reduce GHG emissions, the associated reduction has not been shown to achieve emission levels below existing uses for the site. Details on MM-GHG-1 through MM-GHG-3 are in the greenhouse gas emissions section below.	With the incorporation of MM-GHG-1 through MM-GHG-3, impacts to land use would remain significant and unavoidable.
	Transportation	
As the project is located in Census Tract 170.44 with a vehicle miles traveled (VMT) per resident of 23.4 (SANDAG Series 14 ABM 2+ Base Year 2016), which is 123.4% of the regional mean, and would be above the 85% resident regional VMT per resident significance threshold, impacts associated with VMT would be significant (Impact TRA-1).	The project would mitigate its significant VMT transportation impact through compliance with the Mobility Choices Regulations and rely upon the Findings and Statement of Overriding Considerations of the Complete Communities: Mobility Choices Final Program Environmental Impact Report (PEIR) as mitigation to the extent feasible. Considering the project is located within Mobility Zone 4, the project would be required to provide payment of the Active Transportation In-Lieu Fee towards mobility improvements. **MM-TRA-1:** Prior to final inspection of any buildings, Owner/Permittee shall pay the required Active Transportation In-Lieu Fee in accordance with the Mobility Choices Regulations (San Diego Municipal Code Chapter 14, Article 3, Division 11), Appendix T Mobility Choices Regulations: Implementation Guidelines, which is required of projects located within Mobility Zone 4 under the Complete Communities: Mobility Zone 4 under Complete Communities: Mobility Choices program and ordinance. The project would rely upon the Findings and SOCs from the Complete Communities: Housing Solutions and Mobility Choices Final PEIR for its significant unmitigated VMT impact and would comply with the CAP consistency regulations measures as project design features. Compliance with the Mobility Choices Program would be considered mitigation to the extent feasible for the project's significant VMT transportation impact.	With the incorporation of MM-TRA-1 impacts would remain significant and unavoidable.
	Air Quality	
The project's potential to expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates would be potentially significant (Impact AQ-1) because the unmitigated cancer risk of 45.20 in a million exceeds the CEQA threshold of 10 in a million.	To reduce the potentially significant cancer risk impact from construction emissions, the project shall implement MM-AQ-1. **MM-AQ-1**: Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Permits, and Building Permits, or a Notice to Proceed for Subdivisions by the City of San Diego (City), the Owner/Permittee shall ensure via a written letter provided to the City Mitigation Monitoring Coordinator that all 75-horsepower or greater diesel-powered equipment is powered with California Air Resources Board–certified Tier 4 Interim engines or better. Should Tier IV equipment not be available or possible, the applicant may submit a request to the Development Services Department Environmental Analysis Section to apply an equivalent method of achieving project-generated construction emissions that fall below the numeric California Environmental Quality Act (CEQA) cancer risk standard. Documentation using industry-standard emission estimation methodologies shall be furnished to the City demonstrating that estimated project-generated construction emissions would not exceed the applicable CEQA cancer risk threshold with the alternate construction method(s). If the documentation demonstrates that project-generated construction emissions will remain below the applicable cancer risk threshold, then the City Development Services Department Environmental Analysis Section may approve the alternate construction method(s) at their discretion. Required construction equipment fleet and methodologies approved by the City shall be included in the contract specifications for the applicant's construction contractor.	With implementation of MM-AQ-1 impacts would be reduced to less than significant.

Table ES-1
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measures	Level of Significance After Mitigation
	Biological Resources	
Vegetation Communities and Land Covers The project would impact more than 0.1 acres of land within upland habitats (Tier I through Tier IIIb), and therefore impacts would be potentially significant (Impact BIO-1).	All impacts to vegetation communities and land covers from implementation of the on-site mitigation areas, as part of MM-BIO-1 would be to Tier IV habitats. **MM-BIO-1: Upland Mitigation.** Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Permits, and Building Permits by the City of San Diego (City), the Owner/Permittee shall mitigate for the loss of 1.35 acres of Tier I habitat, 9.90 acres of Tier II habitat, and 6.35 acres of Tier IIIA habitat by providing a minimum of 1.65 acres of Tier I habitat, 9.90 acres of Tier II habitat, and 4.88 acres of Tier IIIA habitat mitigation, through a combination of on-site preservation and on-site revegetation (i.e., creation, restoration, and enhancement). **On-Site Preservation.** The Owner/Permittee shall preserve 7.97 acres within the Multi-Habitat Planning Area (MHPA) that support 1.11 acres of Tier I habitat, 1.23 acres of Tier II habitat, and 5.63 acres of Tier IIIA habitat. The on-site preserved habitat provided to satisfy upland mitigation requirements shall be dedicated to the City with a maintenance endowment and managed in perpetuity by the City as part of the MHPA preserve system. **On-Site Creation, Restoration, and Enhancement.** Prior to the issuance of any construction permits, including but not limited to the first Grading Permit, Demolition Permit, and Building Permit, the Assistant Deputy Director (ADD) environmental designee of the City's Land Development Review Division (LDR) shall verify that the following statement is shown on the grading and/or construction plans as a note under the heading Environmental Requirements: "Renzulli Estates Project is subject to the Mitigation Monitoring and Reporting Program (MMRP) and shall conform to the mitigation conditions as contained in the Environmental Impact Report PRJ-0674401 / State Clearinghouse No. 2022040125." **Prior to Permit Issuance** A. Land Development Review (LDR) Plan Check 1. Prior to the issuance of any construction permits, including but not limited to the first Grading Permit, Demolition Permit, and Building Permit, whichever is applicable, the ADD environmental designee shall verify that the requirements for the revegetation/restoration plans and specifications, including 4.57 acres of creation and restoration of coastal sage scrub (Tier II), 0.54 acres of scrub oak chaparral (Tier I) restoration, 4.51 acres of coastal sage scrub/chaparral (Tier II) restoration, 0.52 acres of southern mixed chaparral (Tier IIIA) restoration, and 0.11 acres of southern mixed chaparral (Tier IIIA) enhancement. The restoration, creation, and enhancement shall be shown and noted on the appropriate landscape construction documents. The landscape construction documents and specifications must be found to be in conformance with the On-site Upland Restoration Plan prepared by Dudek May 2025, the requirements of which are summarized below: B. Restoration Plan(s) and Specifications 1. Landscape Construction Documents (LCDs) shall be prepared on D-sheets and submitted to the City of San Diego Development Services Department, Landscape Architecture Section (LAS) for review and approval. LAS shall consult with Mitigation Monitoring Coordination (MMC) and obtain concurrence prior to approval of LCD. The LCD shall consist of revegetation/restoration, planting, irrigation, and erosion control plans; including all required graphics, notes, details, specifications, letters, and reports as outlined below. 2. Landscape Revegetation/Restoration Planting and Irrigation Plans shall be prepared in accordance with the City's Land Development Code (LDC) Chapter 14, Article 2, Division 4, the LDC Landscape Standards submittal requirements, and Attachment B (General Outline for Revegetation/Restoration Plans) of the City Biology	With the incorporation of MM-BIO-1 impacts would be reduced to less than significant.

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Impact	Mitigation Measures	Level of Significance After Mitigation
	Guidelines. The Principal Qualified Biologist (PQB) shall identify and adequately document all pertinent information concerning the revegetation/restoration goals, such as but not limited to, plant/seed palettes, the timing of installation, plant installation specifications, method of watering, protection of adjacent habitat, erosion and sediment control, performance/success criteria, inspection schedule by City staff, document submittals, reporting schedule, etc. The LCD shall also include comprehensive graphics and notes addressing the ongoing maintenance requirements (after final acceptance by the City). 3. The Revegetation Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Construction Manager (CM), and Grading Contractor (GC), where applicable, shall be responsible for ensuring that all grading and contouring, clearing and grubbing, installation of plant materials, and any necessary maintenance activities or remedial actions required during installation and the 120-day plant establishment period are completed per approved LCD. The following procedures, at a minimum, but not limited to, shall be performed: a. The RMC shall be responsible for the maintenance of the upland mitigation area for a minimum period of 120 days. Maintenance visits shall be conducted on a minimum monthly basis throughout the plant establishment period. b. At the end of the 120-day period, the PQB shall review the mitigation area to assess the completion of the short-term plant establishment period and shall submit a report for approval by MMC. c. MMC will provide approval in writing to begin the 5-year long-term establishment/maintenance and monitoring program. d. Existing indigenous/native species shall not be pruned, thinned, or cleared in the revegetation/mitigation area. e. The revegetation site shall not be fertilized. f. The RIC is responsible for reseeding (if applicable) if weeds are not removed, within 1 week of written recommendation by the PQB. g. Weed control measures shall include the following: (1) hand removal, (2) cutting with power equipment, and (3) chemical control. Hand removal of weeds is the most desirable method of control and shall be used wherever possible. h. Damaged areas shall be repaired immediately by the RIC/RMC. Insect infestations, plant diseases, herbivory, and other pest problems shall be closely monitored throughout the 5-year maintenance period. Protective mechanisms such as metal wire netting shall be used as necessary. Diseased and infected plants shall be immediately disposed of off site in a legally acceptable manner at the discretion of the PQB or Qualified Biological Monitor (QBM) (City approved). Where possible, biological controls shall be used instead of pesticides and herbicides. 4. If a brush management program is required, the revegetation/restoration plan shall show the dimensions of each brush management zone. Notes shall be provided describing the restrictions on planting and maintenance and identifying that the area is impact neutral and shall not be used for habitat mitigation/credit purposes. C. Letters of Qualification Have Been Submitted to ADD 1. The applicant shall submit, for approval, a letter verifying the qualifications of the biological professional to MMC. This letter shall identify the PQB, Principal Restoration Specialist (PRS), and QBM, where applicable, and the names of all other persons involved in the implementation of the revegetation/restoration plan and	

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Impact	Mitigation Measures	Level of Significance After Mitigation
	biological monitoring program, as they are defined in the City Biological Review References. Resumes and the biology worksheet should be updated annually. 2. MMC will provide the applicant with documentation confirming the qualifications of the PQB/PRS/QBM and all City-approved persons involved in the revegetation/restoration plan and biological monitoring of the project. 3. Prior to the start of work, the applicant must obtain approval from MMC for any personnel changes associated with the revegetation/restoration plan and biological monitoring of the project. 4 PQB must also submit evidence to MMC that the PQB/QBM has completed Storm Water Pollution Prevention Program (SWPPP) training. **Prior to Start of Construction** A. PQB/PRS Shall Attend Pre-Construction (Precon) Meetings 1. Prior to beginning any work that requires monitoring: a. The Owner/Permittee or their authorized representative shall arrange a Precon Meeting that shall include the PQB or PRS, Construction Manager (CM) and/or Grading Contractor (GC), Landscape Architect (LA), Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. b. The PQB shall also attend any other grading/excavation-related Precon Meetings to make comments and/or suggestions concerning the revegetation/restoration plan(s) and specifications with the RIC, CM, and/or GC. c. If the PQB is unable to attend the Precon Meeting, the Owner shall schedule a focused Precon Meeting with MMC, PQB/PRS, CM, BI, LA, RIC, RMC, RE and/or BI, if appropriate, prior to the start of any work associated with the revegetation/ restoration phase of the project, including site grading preparation. 2. Where Revegetation/Restoration Work Will Occur a. Prior to the start of any work, the PQB/PRS shall also submit a revegetation/restoration monitoring exhibit (RRME) based on the appropriate reduced LCD (reduced to 11" × 17" format) to MMC and the RE, identifying the areas to be revegetated/restored, including the delineation of the limits of any disturbance/grading and any excavation. b. PQB shall coordinate with the construction superintendent to identify appropriate best management practices (BMPs) on the RRME. 3. When Biological Monitoring Will Occur a. Prior to the start of any work, the PQB/PRS shall also submit a monitoring procedures schedule to MMC and the RE indicating when and where biological monitoring and related activities will occur. 4. PQB Shall Contact MMC to Request Modification a. The PQB may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the revegetation/restoration plans and specifications. This request shall be based on relevant information (such as other sensitive species not listed by federal and/or state agencies and/or not covered by the MSCP and to which any impacts may be considered significant under CEQA) which may reduce or increase the potential for biological resources to be present. **During Construction** A. PQB or QBM Present During Construction/Grading/Planting 1. The PQB or QBM shall be present full-time during construction activities including but not limited to, site preparation, clearing, grading, excavation, landscape establishment in association with on-site native habitat	

Table ES-1
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Impact	Mitigation Measures	Level of Significance After Mitigation
	revegetation activity which could result in impacts to sensitive biological resources as identified in the LCD and on the RRME. The RIC and/or QBM are responsible for notifying the PQB/PRS of changes to any approved construction plans, procedures, and/or activities. The PQB/PRS is responsible for notifying the CM, LA, RE, BI, and MMC of the changes. 2. The PQB or QBM shall document field activity via the Consultant Site Visit Record Forms (CSVR). The CM shall provide the CSVRs on the first day of monitoring, the last day of monitoring, monthly, and in the event of a deviation from conditions identified within the LCD and/or biological monitoring program. The RE shall forward copies to MMC. 3. The PQB or QBM shall be responsible for maintaining and submitting the CSVR at the time that CM responsibilities end (i.e., upon the completion of construction activity other than that associated with biology). 4. All construction activities (including staging areas) shall be restricted to the development areas as shown on the LCD. The PQB/PRS or QBM staff shall monitor construction activities as needed, with MMC concurrence on method and schedule. This is to ensure that construction activities do not encroach into biologically sensitive areas beyond the limits of disturbance as shown on the approved LCD. 5. The PQB or QBM shall supervise the placement of orange construction fencing or City approved equivalent, along the limits of potential disturbance adjacent to (or at the edge of) all sensitive habitats (coastal sage scrub [Tier II], scrub oak chaparral [Tier I], and southern mixed chaparral [Tier IIIA]), as shown on the approved LCD. 6. The PQB shall provide a letter to MMC that limits of potential disturbance have been surveyed and staked, and that the construction fencing is installed properly. 7. The PQB or QBM shall oversee the implementation of BMPs, such as gravel bags, straw logs, silt fences, or equivalent erosion control measures, as needed to ensure the prevention of any significant sediment transport. In addition, the PQB/QBM shall be responsible for verifying the removal of all temporary construction BMPs upon completion of construction activities. Removal of temporary construction BMPs shall be verified in writing on the final construction phase CSVR. 8. PQB shall verify in writing on the CSVR's that no trash stockpiling or oil dumping, fueling of equipment, storage of hazardous wastes or construction equipment/material, parking, or other construction-related activities shall occur adjacent to sensitive habitat. These activities shall occur only within the designated staging area located outside the area defined as a biologically sensitive area. 9. The long-term establishment inspection and reporting schedule per LCD must all be approved by MMC prior to the issuance of the Notice of Completion (NOC) or any bond release. B. Disturbance/Discovery Notification Process 1. If unauthorized disturbances occur or sensitive biological resources are discovered that were not previously identified on the LCD and/or RRME, the PQB or QBM shall direct the contractor to divert construction in the area of disturbance or discovery temporarily and immediately notify the RE or BI, as appropriate. 2. The PQB shall also immediately notify MMC by telephone of the disturbance, report the nature and extent of the disturbance, and recommend the method of additional protection, such as fencing and appropriate Best Management Practices (BMPs). After obtaining concurrence with MMC and the RE, PQB and CM shall install the approved protection and agreement on BMP's. 3. The PQB shall also submit written documentation of the disturbance to MMC within 24 hours by email with photos of the resource in context (e.g., showing adjacent vegetation).	

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Impact	Mitigation Measures	Level of Significance After Mitigation
	C. Determination of Significance 1. The PQB shall evaluate the significance of disturbance and/or discovered biological resource and provide a detailed analysis and recommendation in a letter report with the appropriate photo documentation to MMC to obtain concurrence and formulate a plan of action which can include fines, fees, and supplemental mitigation costs. 2. MMC shall review this letter report and provide the RE with MMC's recommendations and procedures. **Post-Construction** A. Mitigation Monitoring and Reporting Period 1. Five-Year Mitigation Establishment/Maintenance Period a. The RMC shall be retained to complete maintenance monitoring activities throughout the five-year mitigation monitoring period. b. Maintenance visits will be conducted monthly for the first 3 years, quarterly from July to December in the second and third years, and quarterly thereafter. c Maintenance activities will include all items described in the LCD. d. Plant replacement will be conducted as recommended by the PQB (note: plants shall be increased in container size relative to the time of initial installation or establishment or maintenance period may be extended to the satisfaction of MMC). 2. Five-Year Biological Monitoring a. All biological monitoring and reporting shall be conducted by a PQB or QBM, as appropriate, consistent with the LCD. b. Monitoring shall involve both qualitative horticultural monitoring and quantitative monitoring (i.e., performance/success criteria). Horticultural monitoring shall focus on soil conditions (e.g., moisture) and fertility, container plant health, seed germination rates, presence of native and non-native (e.g., invasive exotic) species, any significant disease or pest problems, irrigation repair and scheduling, trash removal, illegal trespass, and any erosion problems. c. After plant installation is complete, qualitative monitoring surveys will occur monthly for the first year, monthly from January to June of the second and third years, quarterly from July to December in the second and third years, and quarterly thereafter. d. Upon the completion of the 120-day short-term plant establishment period, quantitative monitoring surveys shall be conducted at 12, 24, 36, 48, and 60 months by the PQB or QBM. The revegetation/restoration effort shall be quantitatively evaluated once per year (in spring) during years one through five, to determine compliance with the performance standards identified on the LCD. All plant material must have survived without supplemental irrigation for the last two years. e. Quantitative monitoring shall include the use of fixed transects and photo points to determine the vegetative cover within the revegetated habitat. Collection of fixed transect data within the revegetation/restoration site shall result in the calculation of native species richness, percent cover, relative to the reference site, of target vegetation, and percent total cover of non-native/noninvasive vegetation. Container plants will also be counted to determine percent survivorship. The data will be used to determine the attainment of performance/success criteria identified within the LCD. f. The biological monitoring requirements may be reduced if the revegetation meets the fifth-year criteria before the end of the fifth year and the irrigation has been terminated for the last two years.	

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Impact	Mitigation Measures	Level of Significance After Mitigation
	g. The PQB or QBM shall oversee the implementation of post-construction BMPs, such as gravel bags, straw logs, silt fences, or equivalent erosion control measures, as needed to ensure the prevention of any significant sediment transport. In addition, the PQB/QBM shall be responsible for verifying the removal of all temporary post-construction BMPs upon completion of construction activities. Removal of temporary post-construction BMPs shall be verified in writing on the final post-construction phase CSVR. B. Submittal of Draft Monitoring Report 1. A draft monitoring letter report shall be prepared to document the completion of the 120-day plant establishment period. The report shall include a discussion of weed control, horticultural treatments (pruning, mulching, and disease control), erosion control, trash/debris removal, replacement planting/reseeding, site protection/signage, pest management, vandalism, and irrigation maintenance. The revegetation/restoration effort shall be visually assessed at the end of the 120-day period to determine individual mortality. 2. The PQB shall submit two copies of the Draft Monitoring Report which describes the results, analysis, and conclusions of all phases of the Biological Monitoring and Reporting Program (with appropriate graphics) to MMC for review and approval within 30 days following the completion of monitoring. Monitoring reports shall be prepared on an annual basis for a period of five years. Site progress reports shall be prepared by the PQB following each site visit and provided to the Owner, RMC, and RIC. Site progress reports shall review maintenance activities (qualitatively and quantitatively when appropriate), monitoring results including progress of the revegetation relative to the performance/success criteria, and the need for any remedial measures. 3. Draft annual reports (three copies) summarizing the results of each progress report, including quantitative monitoring results and photographs taken from permanent viewpoints, shall be submitted to MMC for review and approval within 30 days following the completion of monitoring. 4. MMC shall return the Draft Monitoring Report to the PQB for revision or, for preparation of each report. 5. The PQB shall submit a revised Monitoring Report to MMC (with a copy to RE) for approval within 30 days. 6. MMC will provide written acceptance of the PQB and RE of the approved report. C. Final Monitoring Reports(s) 1. PQB shall prepare a Final Monitoring upon achievement of the fifth-year performance/success criteria and completion of the five-year maintenance period. a. This report may be issued before the end of the fifth year if the revegetation meets the fifth-year performance /success criteria and the irrigation has been terminated for the last two years. b. The Final Monitoring report shall be submitted to MMC for evaluation of the success of the mitigation effort and final acceptance. At this time, a request for a pre-final inspection shall be submitted; MMC will schedule after reviewing the report. c. If at the end of the five years, any of the revegetated areas fails to meet the project's final success standards, the applicant must consult with MMC. This consultation shall take place to determine whether the revegetation effort is acceptable. The applicant understands that failure of any significant portion of the revegetation/restoration area may result in a requirement to replace or renegotiate that portion of the site and/or extend the monitoring and establishment/maintenance period until all success standards are met.	
Special-Status Plant Species	To reduce the potentially significant special-status plant impact, the project shall implement MM-BIO-2 to translocate individuals.	With implementation of MM-BIO-2, impacts would be less than significant.

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Impact	Mitigation Measures	Level of Significance After Mitigation
The project would impact 13 Del Mar manzanitas individuals and 92 San Diego barrel cactus individuals, and 520 Nuttall's scrub oak individuals. Impacts to Del Mar manzanita, San Diego barrel cactus, and Nuttall's scrub oak special-status plant species are potentially significant (Impact BIO-2).	**MM-BIO-2: On-Site Sensitive Plant Mitigation.** Prior to the issuance of any construction permits, including but not limited to the first Grading Permit, Demolition Permit, and Building Permit, the Assistant Deputy Director (ADD) environmental designee of the City's Land Development Review Division (LDR) shall verify that the following statement is shown on the grading and/or construction plans as a note under the heading Environmental Requirements: "Renzulli Estates Project is subject to the Mitigation Monitoring and Reporting Program (MMRP) and shall conform to the mitigation conditions as contained in the Environmental Impact Report PRJ-0674401/State Clearinghouse No. 2022040125." **Prior to Permit Issuance** A. Land Development Review (LDR) Plan Check 1. Prior to the issuance of any construction permits, including but not limited to the first Grading Permit, Demolition Permit, and Building Permit, whichever is applicable, the ADD environmental designee shall verify that the requirements for sensitive plant species restoration, specifically a minimum survivorship of a minimum of 26 Del Mar manzanita individuals (cuttings from impacted individuals to be propagated and used in on-site restoration), a minimum survivorship of 520 Nuttall's scrub oak (cuttings from impacted individuals to be propagated and used in on-site restoration), and a minimum survivorship of 92 barrel cactus (impacted individuals to be salvaged and translocated in on-site restoration), shall be shown and noted on the appropriate landscape construction documents. The landscape construction documents and specifications must be found to be in conformance with the On-site Upland Restoration Plan prepared by Dudek May 2025, the requirements of which are summarized below: B. Revegetation/Restoration Plan(s) and Specifications 1. Landscape Construction Documents (LCD) shall be prepared on D-sheets and submitted to the City of San Diego Development Services Department, Landscape Architecture Section (LAS) for review and approval. LAS shall consult with Mitigation Monitoring Coordination (MMC) and obtain concurrence prior to approval of LCD. The LCD shall consist of revegetation/restoration, planting, irrigation, and erosion control plans; including all required graphics, notes, details, specifications, letters, and reports as outlined below. 2. Landscape Revegetation/Restoration Planting and Irrigation Plans shall be prepared in accordance with the City's Land Development Code (LDC) Chapter 14, Article 2, Division 4, the LDC Landscape Standards submittal requirements, and Attachment "B" (General Outline for Revegetation/Restoration Plans) of the City Biology Guidelines. The Principal Qualified Biologist (PQB) shall identify and adequately document all pertinent information concerning the revegetation/restoration goals and, such as but not limited to, plant/seed palettes, the timing of installation, plant installation specifications, method of watering, protection of adjacent habitat, erosion, and sediment control, performance/success criteria, inspection schedule by City staff, document submittals, reporting schedule, etc. The LCD shall also include comprehensive graphics and notes addressing the ongoing maintenance requirements (after final acceptance by the City). 3. The Revegetation Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Construction Manager (CM) and Grading Contractor (GC), where applicable shall be responsible for ensuring that all grading and contouring, clearing, and grubbing, installation of plant materials, and any necessary maintenance activities or remedial actions required during installation and the 120-day plant establishment period are done per approved LCD. The following procedures at a minimum, but not limited to, shall be performed:	

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Impact	Mitigation Measures	Level of Significance After Mitigation
	The RMC shall be responsible for the maintenance of the sensitive plant restoration areas for a minimum period of 120 days. Maintenance visits shall be conducted on a minimum monthly basis throughout the plant establishment period. b. At the end of the 120-day period, the PQB shall review the mitigation area to assess the completion of the short-term plant establishment period and submit a report for approval by MMC. c. MMC will provide approval in writing to begin the five-year long-term establishment/maintenance and monitoring program. d. Existing indigenous/native species shall not be pruned, thinned, or cleared in the revegetation/mitigation area. e. The revegetation site shall not be fertilized. f. The RIC is responsible for reseeding (if applicable) if weeds are not removed, within one week of written recommendation by the PQB. g. Weed control measures shall include the following: (1) hand removal, (2) cutting, with power equipment, and (3) chemical control. Hand removal of weeds is the most desirable method of control and will be used wherever possible. h. Damaged areas shall be repaired immediately by the RIC/RMC. Insect infestations, plant diseases, herbivory, and other pest problems will be closely monitored throughout the five-year maintenance period. Protective mechanisms such as metal wire netting shall be used as necessary. Diseased and infected plants shall be immediately disposed of off-site in a legally acceptable manner at the discretion of the PQB or Qualified Biological Monitor (QBM) (City approved). Where possible, biological controls will be used instead of pesticides and herbicides. 4. If a Brush Management Program is required the revegetation/restoration plan shall show the dimensions of each brush management zone. Notes shall be provided describing the restrictions on planting and maintenance and identify that the area is impact neutral and shall not be used for habitat mitigation/credit purposes. C. Letters of Qualification Have Been Submitted to ADD 1. The applicant shall submit, for approval, a letter verifying the qualifications of the biological professional to MMC. This letter shall identify the PQB, Principal Restoration Specialist (PRS), and QBM, where applicable, and the names of all other persons involved in the implementation of the revegetation/restoration plan and biological monitoring program, as they are defined in the City Biological Review References. Resumes and the biology worksheet should be updated annually. 2. MMC will provide the applicant with documentation confirming the qualifications of the PQB/PRS/QBM and all city-approved persons involved in the revegetation/restoration plan and biological monitoring of the project. 3. Prior to the start of work, the applicant must obtain approval from MMC for any personnel changes associated with the revegetation/restoration plan and biological monitoring of the project. 4. PQB must also submit evidence to MMC that the PQB/QBM has completed Storm Water Pollution Prevention Program (SWPPP) training. **Prior to Start of Construction** A. PQB/PRS Shall Attend Pre-Construction (Precon) Meetings 1. Prior to beginning any work that requires monitoring:	

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Impact	Mitigation Measures	Level of Significance After Mitigation
	a. The Owner/Permittee or their authorized representative shall arrange a Precon Meeting that shall include the PQB or PRS, Construction Manager (CM) and/or Grading Contractor (GC), Landscape Architect (LA), Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. b. The PQB shall also attend any other grading/excavation-related Precon Meetings to make comments and/or suggestions concerning the revegetation/restoration plan(s) and specifications with the RIC, CM, and/or GC. c. If the PQB is unable to attend the Precon Meeting, the Owner shall schedule a focused Precon Meeting with MMC, PQB/PRS, CM, BI, LA, RIC, RMC, RE and/or BI, if appropriate, prior to the start of any work associated with the revegetation/ restoration phase of the project, including site grading preparation. 2. Where Revegetation/Restoration Work Will Occur a. Prior to the start of any work, the PQB/PRS shall also submit a revegetation/restoration monitoring exhibit (RRME) based on the appropriate reduced LCD (reduced to 11"x 17" format) to MMC, and the RE, identifying the areas to be revegetated/restored including the delineation of the limits of any disturbance/grading and any excavation. b. PQB shall coordinate with the construction superintendent to identify appropriate Best Management Practices (BMP's) on the RRME. 3. When Biological Monitoring Will Occur a. Prior to the start of any work, the PQB/PRS shall also submit a monitoring procedures schedule to MMC and the RE indicating when and where biological monitoring and related activities will occur. 4. PQB Shall Contact MMC to Request Modification a. The PQB may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the revegetation/restoration plans and specifications. This request shall be based on relevant information (such as other sensitive species not listed by federal and/or state agencies and/or not covered by the MSCP and to which any impacts may be considered significant under CEQA) which may reduce or increase the potential for biological resources to be present. **During Construction** A. PQB or QBM Present During Construction/Grading/Planting 1. The PQB or QBM shall be present full-time during construction activities including but not limited to, site preparation, clearing, grading, excavation, landscape establishment in association with sensitive plant restoration activity which could result in impacts to sensitive biological resources as identified in the LCD and on the RRME. The RIC and/or QBM are responsible for notifying the PQB/PRS of changes to any approved construction plans, procedures, and/or activities. The PQB/PRS is responsible for notifying the CM, LA, RE, BI, and MMC of the changes. 2. The PQB or QBM shall document field activity via the Consultant Site Visit Record Forms (CSVR). The CM shall provide the CSVRs on the first day of monitoring, the last day of monitoring, monthly, and in the event of a deviation from conditions identified within the LCD and/or biological monitoring program. The RE shall forward copies to MMC. 3. The PQB or QBM shall be responsible for maintaining and submitting the CSVR at the time that CM responsibilities end (i.e., upon the completion of construction activity other than that associated with biology).	

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	4. All construction activities (including staging areas) shall be restricted to the development areas as shown on the LCD. The PQB/PRS or QBM staff shall monitor construction activities as needed, with MMC concurrence on method and schedule. This is to ensure that construction activities do not encroach into biologically sensitive areas beyond the limits of disturbance as shown on the approved LCD. 5. The PQB or QBM shall supervise the placement of orange construction fencing or City approved equivalent, along the limits of potential disturbance adjacent to (or at the edge of) all sensitive habitats (coastal sage scrub [Tier II], scrub oak chaparral [Tier I], and southern mixed chaparral [Tier IIIA]) as shown on the approved LCD. 6. The PQB shall provide a letter to MMC that limits of potential disturbance have been surveyed and staked, and that the construction fencing is installed properly. 7. The PQB or QBM shall oversee the implementation of BMPs, such as gravel bags, straw logs, silt fences, or equivalent erosion control measures, as needed to ensure the prevention of any significant sediment transport. In addition, the PQB/QBM shall be responsible for verifying the removal of all temporary construction BMPs upon completion of construction activities. Removal of temporary construction BMPs shall be verified in writing on the final construction phase CSVR. 8 PQB shall verify in writing on the CSVR's that no trash stockpiling or oil dumping, fueling of equipment, storage of hazardous wastes or construction equipment/material, parking, or other construction-related activities shall occur adjacent to sensitive habitat. These activities shall occur only within the designated staging area located outside the area defined as a biologically sensitive area. 9. The long-term establishment inspection and reporting schedule per LCD must all be approved by MMC prior to the issuance of the Notice of Completion (NOC) or any bond release. B. Disturbance/Discovery Notification Process 1. If unauthorized disturbances occur or sensitive biological resources are discovered that were not previously identified on the LCD and/or RRME, the PQB or QBM shall direct the contractor to divert construction in the area of disturbance or discovery temporarily and immediately notify the RE or BI, as appropriate. 2. The PQB shall also immediately notify MMC by telephone of the disturbance, report the nature and extent of the disturbance, and recommend the method of additional protection, such as fencing and appropriate Best Management Practices (BMPs). After obtaining concurrence with MMC and the RE, PQB and CM shall install the approved protection and agreement on BMP's. 3. The PQB shall also submit written documentation of the disturbance to MMC within 24 hours by email with photos of the resource in context (e.g., showing adjacent vegetation). C. Determination of Significance 1. The PQB shall evaluate the significance of disturbance and/or discovered biological resource and provide a detailed analysis and recommendation in a letter report with the appropriate photo documentation to MMC to obtain concurrence and formulate a plan of action which can include fines, fees, and supplemental mitigation costs. 2. MMC shall review this letter report and provide the RE with MMC's recommendations and procedures. **Post-Construction** A. Mitigation Monitoring and Reporting Period 1. Five-Year Mitigation Establishment/Maintenance Period	

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Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measures	Level of Significance After Mitigation
	a. The RMC shall be retained to complete maintenance monitoring activities throughout the five-year mitigation monitoring period. b. Maintenance visits will be conducted monthly for the first year, monthly from January to June of the second and third years, quarterly from July to December in the second and third years, and quarterly thereafter. c. Maintenance activities will include all items described in the LCD. d. Plant replacement will be conducted as recommended by the PQB (note: plants shall be increased in container size relative to the time of initial installation or establishment or maintenance period may be extended to the satisfaction of MMC. 2. Five-Year Biological Monitoring a. All biological monitoring and reporting shall be conducted by a PQB or QBM, as appropriate, consistent with the LCD. b. Monitoring shall involve both qualitative horticultural monitoring and quantitative monitoring (i.e., performance/success criteria). Horticultural monitoring shall focus on soil conditions (e.g., moisture and fertility), container plant health, seed germination rates, presence of native and non-native (e.g., invasive exotic) species, any significant disease or pest problems, irrigation repair and scheduling, trash removal, illegal trespass, and any erosion problems. c. After plant installation is complete, qualitative monitoring surveys will occur monthly for the first 3 years, quarterly from July to December in the second and third years, and quarterly thereafter. d. Upon the completion of the 120-day short-term plant establishment period, quantitative monitoring surveys shall be conducted at 12, 24, 36, 48, and 60 months by the PQB or QBM. The revegetation/ restoration effort shall be quantitatively evaluated once per year (in spring) during years one through five, to determine compliance with the performance standards identified on the LCD. All plant material must have survived without supplemental irrigation for the last two years. e. Quantitative monitoring shall include counts of Del Mar manzanita, Nuttall's scrub oak and barrel cactus survivorship. The data will be used to determine the attainment of performance/success criteria identified within the LCD. f. The biological monitoring requirements may be reduced if the revegetation meets the fifth-year criteria before the end of the fifth year and the irrigation has been terminated for the last two years. g. The PQB or QBM shall oversee the implementation of post-construction BMPs, such as gravel bags, straw logs, silt fences, or equivalent erosion control measures, as needed to ensure the prevention of any significant sediment transport. In addition, the PQB/QBM shall be responsible for verifying the removal of all temporary post-construction BMPs upon completion of construction activities. Removal of temporary post-construction BMPs shall be verified in writing on the final post-construction phase CSVR. C. Submittal of Draft Monitoring Report 1. A draft monitoring letter report shall be prepared to document the completion of the 120-day plant establishment period. The report shall include a discussion of weed control, horticultural treatments (pruning, mulching, and disease control), erosion control, trash/debris removal, replacement planting/reseeding, site protection/signage, pest management, vandalism, and irrigation maintenance. The revegetation/restoration effort shall be visually assessed at the end of the 120-day period to determine individual mortality.	

Table ES-1
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measures	Level of Significance After Mitigation
	2. The PQB shall submit two copies of the Draft Monitoring Report which describes the results, analysis, and conclusions of all phases of the Biological Monitoring and Reporting Program (with appropriate graphics) to MMC for review and approval within 30 days following the completion of monitoring. Monitoring reports shall be prepared on an annual basis for a period of five years. Site progress reports shall be prepared by the PQB following each site visit and provided to the Owner, RMC, and RIC. Site progress reports shall review maintenance activities (qualitatively and quantitatively when appropriate), monitoring results including progress of the revegetation relative to the performance/success criteria, and the need for any remedial measures. 3. Draft annual reports (three copies) summarizing the results of each progress report, including quantitative monitoring results and photographs taken from permanent viewpoints, shall be submitted to MMC for review and approval within 30 days following the completion of monitoring. 4. MMC shall return the Draft Monitoring Report to the PQB for revision or, for preparation of each report. 5. The PQB shall submit a revised Monitoring Report to MMC (with a copy to RE) for approval within 30 days. 6. MMC will provide written acceptance of the PQB and RE of the approved report. D. Final Monitoring Reports(s) 1. PQB shall prepare a Final Monitoring upon achievement of the fifth-year performance/success criteria and completion of the five-year maintenance period. a. This report may be issued before the end of the fifth year if the revegetation meets the fifth-year performance /success criteria and the irrigation has been terminated for the last two years. b. The Final Monitoring report shall be submitted to MMC for evaluation of the success of the mitigation effort and final acceptance. At this time, a request for a pre-final inspection shall be submitted; MMC will schedule after reviewing the report. c. If at the end of the five years, any of the revegetated areas fails to meet the project's final success standards, the applicant must consult with MMC. This consultation shall take place to determine whether the revegetation effort is acceptable. The applicant understands that failure of any significant portion of the revegetation/restoration area may result in a requirement to replace or renegotiate that portion of the site and/or extend the monitoring and establishment/maintenance period until all success standards are met.	
Special-Status Wildlife Species The project would result in direct impacts to San Diegan tiger whiptail, orange-throated whiptail, Crotch's bumble bee (foraging habitat), red diamondback rattlesnake, San Diego ringneck snake, two-striped gartersnake, Dulzura pocket mouse, northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, Cooper's hawk, and San Diego desert woodrat due to loss of habitat and potential mortality. Impacts to special-status wildlife species are potentially significant (Impact BIO-3).	Potential impacts to nesting birds, including raptors, through direct take of active nest or indirect noise/disturbance to raptor nests within 300 feet would be less than significant with implementation of MM-BIO-3 that requires avoidance of active nest through seasonal restriction or surveys to confirm a lack of active nests within project work areas or within a 300-foot buffer for raptors, including Cooper's hawk. Potential impacts to coastal California gnatcatcher would be less than significant through implementation of MM-BIO-4 that requires avoidance of the breeding season or surveys and noise monitoring to ensure occupied habitat areas are not subject to direct or indirect impacts that could result in breeding impacts. To reduce impacts to Crotch's bumble bee to less than significant, a pre-construction survey for the species would be conducted, which would help minimize take of individuals (MM-BIO-5). The loss of nesting and foraging habitat for Crotch's bumble bee is reduced to less than significant through implementation of MM-BIO-1. Impacts to other identified special-status species would be reduced through implementation of on-site habitat-based upland compensatory mitigation, including preservation and restoration, under MM-BIO-1.	With implementation of MM-BIO-1 and MM-BIO-5, impacts to Crotch's bumble bee would be less than significant. With implementation of MM-BIO-1, MM-BIO-3 and MM-BIO-4, impacts to other species would be less than significant.

Table ES-1
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measures	Level of Significance After Mitigation
	MM-BIO-3: Avian Protection Requirements. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits, and Building Plans/Permits, or a Notice to Proceed for Subdivisions, removal of habitat that supports active Cooper's hawk nests in the proposed area of disturbance (both on site and within the Wetland Plan area of work) should occur outside of the avian breeding season (February 1 to September 15) or a pre-construction survey shall be completed by a Qualified Biologist to determine the presence or absence of active nesting Cooper's hawk on the proposed area of disturbance or within 300 feet of the area of disturbance. The pre-construction survey shall be conducted within 3 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to City of San Diego DSD for review and written approval prior to initiating any construction activities. If nesting Cooper's hawk are detected, a letter report in conformance with the City of San Diego's Biology Guidelines and applicable state and federal law (i.e., appropriate follow-up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. A minimum 300-foot buffer shall be established from any nesting Cooper's hawk. The report shall be submitted to the City of San Diego for review and written approval and implemented to the satisfaction of the City of San Diego. The City of San Diego's MMC Section and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. **MM-BIO-4: Coastal California Gnatcatcher.** Prior to the issuance of any Notice to Proceed, or pre-construction meeting, the City Deputy Director (or appointed designee) shall verify that the Multi-Habitat Planning Area (MHPA) boundaries and the following project requirements regarding the coastal California gnatcatcher are shown on the construction plans: No clearing, grubbing, grading, or other construction activities shall occur within the MHPA between March 1 and August 15, the breeding season of the coastal California gnatcatcher, until the following requirements have been met to the satisfaction of the Deputy Director (or appointed designee): A. A Qualified Biologist (possessing a valid Endangered Species Act Section 10(a)(1)(a) recovery permit) shall survey those habitat areas within the MHPA that would be subject to construction noise levels exceeding 60 dB(A) hourly average for the presence of the coastal California gnatcatcher. Surveys for the coastal California gnatcatcher shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of any construction. If gnatcatchers are present, then the following conditions must be met: **i.** Between March 1 and August 15, no clearing, grubbing, or grading of occupied gnatcatcher habitat shall be permitted within the MHPA. Areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; and **ii.** Between March 1 and August 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dB(A) hourly average at the edge of occupied gnatcatcher habitat within the MHPA. An analysis showing that noise generated by construction activities would not exceed 60 dB(A) hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing a current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the City representative at least 2 weeks prior to the commencement of construction activities. Prior to the commencement of construction activities during the	

Table ES-1
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measures	Level of Significance After Mitigation
	breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; or **iii.** At least 2 weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dB(A) hourly average at the edge of habitat occupied by the coastal California gnatcatcher. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring* shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dB(A) hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (August 16). *Note: Construction noise shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the City representative, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment. B. If coastal California gnatcatchers are not detected during the protocol survey, the Qualified Biologist shall submit substantial evidence to the Deputy Director (or appointed designee) and applicable resource agencies that demonstrates whether or not mitigation measures, such as noise walls, are necessary between March 1 and August 15, as follows: **i.** If this evidence indicates the potential is high for coastal California gnatcatcher to be present based on historical records or site conditions, then condition A.iii shall be adhered to, as specified above. **ii.** If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary. **MM-BIO-5: Pre-Construction Survey for Crotch's Bumble Bee.** Should this species no longer be a state candidate for listing or state listed threatened or endangered at the time of the pre-construction meeting or protocol surveys are completed and determine the species is absent from the project site, then no avoidance measures shall be required. Prior to the issuance of a Notice to Proceed (NTP) for construction permits, such as Demolition Grading or Building or beginning and construction-related activity on site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve Construction Documents (CD) (plans, specification, details, etc.) to ensure the applicable MMRP requirements are incorporated into the design: A) The owner/permittee shall obtain an Incidental Take Permit (ITP) from the California Department of Fish and Wildlife (CDFW) prior to the issuance of Grading Permit, Demolition Plans/Permits and Building Plans/Permits. Take of any endangered,	

Table ES-1
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measures	Level of Significance After Mitigation
	threatened, candidate species that results from the project is prohibited, except as authorized by State law (California Fish and Game Code §§ 86, 2062, 2067, 2068, 2080, 2085; California Code of Regulations, Title 14, §786.9) under the CESA. B) To avoid impacts on Crotch's bumble bee, removal of habitat in the proposed area of disturbance must occur outside of the Colony Active Period between April 1 through August 31. If the removal of habitat in the proposed area of disturbance must occur during the Colony Active Period, a Qualified Biologist shall conduct a pre-activity survey to determine the presence or absence of Crotch's bumble bee within the proposed area of disturbance. C) Surveys must be conducted by a Qualified Biologist meeting the qualifications discussed in the CDFW guidance (i.e., Survey Considerations for California Endangered Species Act [CESA] Candidate Bumble Bee Species, dated June 6, 2023). D) The pre-activity survey shall consist of photographic surveys following CDFW guidance (i.e., Survey Considerations for CESA Candidate Bumble Bee Species, dated June 6, 2023). In coordination with CDFW, the Qualified Biologist may be required to send all photo vouchers to a CDFW-approved taxonomist to confirm the identifications of the bumble bees encountered during surveys. The surveys shall consist of passive methods unless a Memorandum of Understanding is obtained from CDFW. If additional activities (e.g., capture or handling) are deemed necessary to identify bumble bees of an unknown species that may be Crotch's bumble bee then the Qualified Biologist shall obtain the required authorization via a Memorandum of Understanding or Scientific Collecting Permit pursuant to CDFW Survey Considerations for CESA Candidate Bumble Bee Species (CDFW 2023). Survey methods that involve lethal take of species are not acceptable. Survey results will be considered valid until the start of the next colony active period. E) If pre-activity surveys identify Crotch's bumble bee individuals on-site, the Qualified Biologist shall notify and consult with CDFW to establish, monitor, and maintain no-work buffers around the associated floral resources or nest, as appropriate. The size and configuration of the no-work buffer shall be based on the best professional judgment of the Qualified Biologist in consultation with CDFW . Construction activities shall not occur within the no-work buffers until the bees appear no longer active (i.e., associated floral resources appear desiccated and no bees are seen flying for three consecutive days indicating dispersal from the area). F) Survey data shall be submitted by the Qualified Biologist to the California Natural Diversity Database (CNDDB) in accordance with the Memorandum of Understanding with CDFW, or Scientific Collecting Permit requirements, as applicable	
Jurisdictional Wetlands Impacts associated with project construction and restoration activities within the areas potentially under the jurisdiction of RWQCB and/or CDFW are anticipated to be potentially significant (Impact BIO-4).	Impacts to jurisdictional areas are expected to require permit authorization from CDFW and RWQCB, with compensatory mitigation requirements for impacts to natural flood channel and emergent wetland. With implementation of MM-BIO-6, permit authorizations from CDFW and RWQCB would be obtained, and the project would be in compliance with CDFW and RWQCB mitigation requirements. **MM-BIO-6**: **Jurisdictional Aquatic Resources.** Prior to issuance of any construction permits, including clearing, grubbing, grading, and/or construction permits by the City of San Diego that impact jurisdictional waters, the project applicant shall obtain all necessary permits from RWQCB and CDFW (or written verification from these agencies that permits are not required). The applicant shall mitigate direct impacts in accordance with the terms and conditions of all required permits. Areas under the jurisdictional authority of RWQCB and CDFW shall be delineated on all grading plans.	With implementation of MM-BIO-6, impacts would be less than significant.

Table ES-1
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measures	Level of Significance After Mitigation
	Greenhouse Gas Emissions	
The project would be more GHG-intensive than assumed in the CAP for the project site, therefore the project impact would be potentially significant (Impact GHG-1).	Due to the increase in land use intensity of the site, the project would be more GHG-intensive than the existing designations. Mitigation measures are identified to ensure that compliance with the CAP Regulations is fulfilled through implementation by the project development. To reduce the potential GHG emissions associated with the project to the extent feasible, the applicant shall implement MM-GHG-1 through MM-GHG-3. **MM-GHG-1:** Prior to the issuance of building permits, the City of San Diego (City) shall verify that the building plans provide street trees. Per Climate Action Plan Consistency Regulation Section (a)(1)(C), shade tree coverage shall be determined by the expected canopy at 10-year maturity and shall be selected in accordance with the City's Land Development Manual and Street Tree Selection Guide. Trees shall be irrigated, and the number of trees shall meet the requirements of Landscape Regulations in Chapter 14, Article 2, Division 4 of the San Diego Municipal Code. MM-GHG-2: Prior to the issuance of building permits, the City of San Diego shall verify that the building plans demonstrate the project includes 0.6 bicycle parking spaces per each 3- to 4-bedroom dwelling unit of the multifamily unit, for a total of 8 bicycle parking spaces. 50% of the 8 bicycle parking spaces (4 spaces) shall include outlets for electric charging. **MM-GHG-3:** Prior to the issuance of building permits, the City of San Diego (City) shall verify that the building plans demonstrate that the project includes at least 215 trees (536,168 square feet/5,000 square feet × 2 trees), with at least 1 tree on each lot and: • New trees planted will comply with the Landscape Standards of the City's Land Development Manual and Street Tree Selection Guide. • Where possible, trees shall be planted in native soils. When native soil planting is prohibited by site conditions, trees shall be provided in planters and pots on structural podiums with an inside dimension of 48 inches. • Trees shall be irrigated and maintained consistent with Section 142.0403 of the San Diego Municipal Code (SDMC). The number of trees shall not be less than the requirements of the Landscape Regulations in Chapter 14, Article 2, Division 4 of the SDMC.	With implementation of MM-GHG-1 through MM-GHG-3, impacts would remain significant and unavoidable.
	Noise	
Short-Term Construction While typical construction noise would not exceed the aforementioned City's threshold, there is potential for noise to exceed the 75 dBA Leq 12-hour City threshold at the nearest residential receiver on occasion. Thus, temporary construction-related noise impacts would be considered potentially significant (Impact NOI-1).	With the implementation of MM-NOI-1, project construction noise would be compliant with the 75 dBA threshold and construction noise impacts would be compliant with the 75 dBA threshold. The anticipated need for implementation of MM-NOI-1 is not site-wide and is limited only to where proposed project construction activity is expected to occur as close as the aforementioned 12.5 feet to the property line based on the site plan. **MM-NOI-1:** Prior to issuance of construction permits, including but not limited to, the first Grading Permit, Demolition Permits, and Building Permits by the City of San Diego (City), the Owner/Permittee shall prepare and submit a Construction Noise Management Plan (CNMP) to the City's Environmental Analysis Section of the Development Services Department for review and approval. Prior to the issuance of a Construction Permit, Construction Plans shall also include a note indicating that compliance with the CNMP is required and that outlines the requirements identified in the CNMP. The CNMP shall be prepared or reviewed by a Qualified Acoustician (defined as having a Bachelor of Science or higher degree from a qualified program in engineering, physics, or architecture offered by an accredited university or college, and 5 years of experience in noise control engineering and construction noise analysis; or current enrollment as a full Member or Board-certified Member in the Institute of Noise Control Engineering. In addition, a Qualified Acoustician must have demonstrated experience in preparing and implementing construction noise controls, sound abatement, and monitoring plans on construction projects; calculating construction noise	With implementation of MM-NOI-1 impacts would be reduced to less than significant.

Table ES-1
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measures	Level of Significance After Mitigation
	levels; and designing and overseeing the implementation of construction noise abatement measures). The CNMP shall include the following: a. A detailed construction schedule at daily (or weekly if activities during each day of the week are typical) resolution and correlating to areas or zones of on-site project construction activities and the anticipated equipment types and quantities involved. Information shall include expected hours of actual operation per day for each type of equipment per activity for the buildout phase, and the anticipated concurrent construction activities on site. b. Review and revision (if needed) of construction noise level estimates based on the current construction schedule and equipment roster per "a." above and reflecting information from the latest project site plan of expected features and work areas, to determine the anticipated need for construction noise level monitoring. c. Identification of locations to monitor, if established per "b." above, attended by a Qualified Acoustician or another party under its supervision or direction, at which sample outdoor ambient noise levels will be measured and collected over a sufficient sample period and subsequently analyzed (i.e., compared with applicable time-dependent A-weighted decibel [dBA] thresholds) to ascertain compliance with the SDMC 59.5.0404(c) threshold of 75 dBA equivalent sound level (L_{eq}) over a consecutive 12-hour period during daytime hours (7:00 a.m. to 7:00 p.m.). Sampling shall be performed, at a minimum, on the first (or otherwise considered typical construction operations) day of each distinct construction phase (e.g., each of the seven listed phases in the Renzulli Environmental Impact Report (SCH 2022040125) Table 5.11-3). d. If sample collected noise level data indicates that the 12-hour noise threshold has or will be exceeded, construction work shall be suspended (for the activity or phase of concern) and the Permittee shall implement measures as detailed or specified in the CNMP that will demonstrate compliance with SDMC 59.5.0404(c) threshold, which may include but are not limited to: i. Administrative controls (e.g., reduce operating time of equipment and/or prohibit usage of equipment type[s] within certain distances). ii. Engineering controls (upgrade noise controls, such as install better engine exhaust mufflers). iii. Install noise abatement on the site boundary fencing (or within, as practical and appropriate) in the form of sound blankets or comparable temporary barriers to occlude construction noise emission between the site (or specific equipment operation as the situation may define) and the noise-sensitive receptor(s) of concern. The implemented measure(s) shall be reviewed or otherwise inspected and approved by the Qualified Acoustician (or another party under their supervision or direction) prior to the resumption of the construction activity or process that caused the measured noise concern or need for noise mitigation. Noise levels shall be re-measured after the installation of said measures to ascertain post-mitigation compliance with the noise threshold. As needed, this process shall be repeated and refined until noise level compliance is demonstrated and documented. A report of this implemented mitigation and its documented success to provide compliance with the SDMC 59.5.0404(c) threshold would be provided to Mitigation Monitoring Coordination. e. The Permittee shall make available a telephone hotline posted on an 11x17 sign at the entrance of the construction site so that concerned neighbors in the community may call to report noise complaints. The CNMP shall include a process to investigate these complaints and, if determined to be valid, detail efforts to provide a timely resolution and response to the complainant, with a copy of the resolution provided to the Mitigation Monitoring Coordination.	

Table ES-1
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measures	Level of Significance After Mitigation
Visual Effects and Neighborhood Character		
The proposed project would result in a potentially significant temporary impact related to a substantial change in the existing landform.	No feasible mitigation is available to address the temporary significant impacts related to a substantial change in the existing landform.	No feasible mitigation is available to address the temporary significant impacts related to a substantial change in the existing landform. Project impacts related to a temporary substantial change in the existing landform would remain significant.

CHAPTER 1 INTRODUCTION

This chapter provides the purpose and legal authority for this environmental impact report (EIR) for the proposed Renzulli Estates Project (project), the EIR scope and process, and an explanation of how the EIR is organized.

1.1 EIR PURPOSE AND LEGAL AUTHORITY

The purposes of an EIR are to accomplish the following:

- Inform governmental decision makers and the general public of the potentially significant environmental effects of the proposed project.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Reduce environmental impacts by identifying changes in the proposed project through the use of alternatives or mitigation measures.
- Streamline environmental review for subsequent projects consistent with the project.

1.1.1 EIR LEGAL AUTHORITY

The City of San Diego (City) is the lead agency, which, as defined by Section 21063 of the California Environmental Quality Act (CEQA) statute, is "the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment." This document complies with the criteria, standards, and procedures of CEQA (California Public Resources Code, Section 21000 et seq.) and the CEQA Guidelines (14 CCR 15000 et seq.). Further, this document has been prepared as a project EIR pursuant to Section 15161 of the CEQA Guidelines.

This EIR has been prepared in accordance with the City's EIR Guidelines (City of San Diego 2005) and the City's CEQA Significance Determination Thresholds (City of San Diego 2022). This document represents the independent judgment of the City as the lead agency (14 CCR 15050).

1.1.2 INTENDED USE OF THE EIR

The EIR is an informational document that will provide decision makers, responsible or trustee agencies (as defined under CEQA), other interested public agencies or jurisdictions, and members of the general public with information about (1) the potential for significant adverse environmental impacts that would result from the development of the proposed project, (2) possible ways to minimize any significant environmental impacts, and (3) feasible alternatives to the proposed project (California Public Resources Code, Section 21002.1[a]; 14 CCR 15121[a]). Responsible agencies may also use this EIR to fulfill their legal authority to issue permits for the proposed project.

The EIR is informational in nature and is intended for use by City decision makers; other responsible, trustee, or interested agencies; and the general public in evaluating the potential environmental effects, mitigation measures, and alternatives of the project. This EIR provides 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 environmental changes that would accompany the approval of the project. The EIR includes recommended mitigation measures that, when implemented, would substantially lessen or avoid significant effects of the project on the environment, whenever feasible. Potentially feasible alternatives to the project are presented to evaluate alternative development scenarios that can further reduce or avoid significant impacts associated with the project while meeting the basic project objectives.

1.1.3 LEAD AGENCY

The City is the lead agency in preparing this EIR in accordance with the CEQA statute (California Public Resources Code, Section 21000 et seq.) and CEQA Guidelines (14 CCR 15000 et seq.). As lead agency, the City conducted a preliminary review of the proposed development and determined that this EIR was required. The analysis and findings in this document reflect the independent, impartial conclusions of the City.

1.1.4 RESPONSIBLE AND TRUSTEE AGENCIES

State law requires that all EIRs be reviewed by responsible and trustee agencies. A responsible agency, defined pursuant to CEQA Guidelines Section 15381, includes all public agencies other than the lead agency that have discretionary approval power over the project. A trustee agency is defined in Section 15386 of the CEQA Guidelines as a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California. Responsible and trustee agencies for the project include, but are not limited to, the following:

- California Department of Fish and Wildlife
- Department of Environmental Health and Quality or California Department of Toxic Substances Control

1.2 EIR TYPE

1.2.1 TYPE OF EIR

This EIR has been prepared as a project EIR, as defined in Section 15161 of the CEQA Guidelines. A project EIR should “focus primarily on the changes in the environment that would result from the development project.” Furthermore, a project EIR should “examine all phases of the project including

planning, construction and operation." The proposed project and other related actions are described in Chapter 3, Project Description.

1.2.2 NOTICE OF PREPARATION

In reviewing the application for the project, the City concluded that the project could result in potentially significant environmental impacts. As the lead agency, the City prepared a scoping letter, which was distributed with the Notice of Preparation (NOP) on April 6, 2022, to all responsible and trustee agencies, as well as various governmental agencies, including the Governor's Office of Planning and Research's[1] State Clearinghouse, and interested individuals. The City's environmental review staff determined that the project meets the CEQA requirements for an EIR and a scoping meeting would be held to solicit comments regarding the scope and analysis of the EIR. However, due to the State of Emergency in place at the time and in the interest of public health and safety, as well as in accordance with the Office of Planning and Research, the City was not conducting in-person scoping meetings. Therefore, in lieu of a public scoping meeting held in person, a pre-recorded presentation was made accessible to the public and was available for viewing from April 6, 2022, to May 6, 2022.

The scope of analysis for this EIR was determined by the City as a result of initial project review and consideration of comments received in response to the NOP. The NOP and public comments received are included as Appendix A of this EIR. Through these scoping activities, two issue areas were determined not to be significant, agricultural resources and mineral resources, as described in Chapter 7, Effects Found Not to Be Significant. Through the scoping process, it was determined that the following subject areas would be analyzed in greater detail in the EIR:

- Air Quality and Odor
- Biological Resources
- Energy
- Geologic conditions
- Greenhouse Gas Emissions
- Health and Safety
- Historical Resources
- Hydrology
- Land Use
- Noise
- Paleontological Resources
- Population and Housing
- Public Services and Facilities
- Public Utilities
- Transportation
- Tribal Cultural Resources
- Visual Effects and Neighborhood Character
- Water Quality
- Wildfire

[1] Renamed the Governor's Office of Land Use and Climate Innovation as of July 1, 2024.

Verbal and written comments received during the scoping process are included in Appendix A and have been taken into consideration during the preparation of this EIR. A total of 10 comment letters were received and the concerns are summarized in Table 1-1.

The environmental conditions evaluated as the baseline in this EIR are those that existed at the time the NOP was circulated as described in Chapter 2, Environmental Setting.

Table 1-1
Public Comments to Notice of Preparation

No.	Commenter	Comments/Concerns	Applicable EIR Section	Date Dated or Received
		Tribal Government		
1	Viejas Band of Kumeyaay Indians	Cultural resources within or adjacent to the project; requested a monitor during ground disturbing activities	5.16, Tribal Cultural Resources	April 14, 2022
2	Barona Band of Mission Indians	Tribal cultural resources impacts; requested a copy of Tribal cultural resource survey	5.16, Tribal Cultural Resources	April 22, 2022
		State Agencies		
3	Native American Heritage Commission	Recommended conducting cultural resource assessments and consulting with California Native American tribes in compliance with Assembly Bill 52 and Senate Bill 18	5.16, Tribal Cultural Resources	April 15, 2022
4	Caltrans	Encouraged coordination on Complete Street projects, smart growth, right-of-way impacts, encroachment permits, and mitigation measures; identified need for traffic impact study; broadband connection	5.2, Transportation; 5.1, Land Use	May 5, 2022
5	California Department of Fish and Wildlife	Recommended coordination on Multi-Habitat Planning Area Boundary Line Adjustment; recommended information to be included about proposed trails and fuel modification zones, biological assessment and impacts, project description and alternatives, compensatory mitigation, nesting birds, translocation/salvage of plants, monitoring, permits, invasive plants, long-term management, and jurisdictional waters	5.4, Biological Resources	May 6, 2022

Table 1-1
Public Comments to Notice of Preparation

No.	Commenter	Comments/Concerns	Applicable EIR Section	Date Dated or Received
6	San Diego County Archeological Society	Pleased with the inclusion of historical resources and requested to be notified during public review of Draft EIR and to ensure availability of the cultural resource technical report	5.9, Historical Resources; 5.16, Tribal Cultural Resources	April 18, 2022
7	San Diego Association of Governments (SANDAG)	Encouraged coordination with SANDAG regarding consistency with 2021 Regional Plan and Sustainable Communities Strategy	5.2, Transportation	May 5, 2024
		Individuals		
8	Shauna Lindsay	Requested consideration of a park expansion; expressed concerns about emergency egress and evacuation; included questions about whether trees and native vegetation will be planted	5.14, Public Services and Facilities; 5.4, Biological Resources	April 11, 2022
9	Daniel Roberts	Identified inconsistency with the Community Plan; requested that an accident assessment be included to address accident and traffic concerns; indicated preference for a discontinuous Cypress Canyon Road to mitigate traffic risks; provides thoughts on evacuation and emergency access details	5.2, Transportation; 5.1, Land Use; 5.14, Public Services and Facilities	April 13, 2022
10	Nick and Becky	Requested efforts to reduce general traffic and illegal car racing on Cypress Canyon Road to address accidents and safety concerns; identified concerns about air pollution and gasoline odor; and identified concerns about increased street noise	5.2, Transportation; 5.3, Air Quality; 5.11, Noise	May 6, 2022

1.2.3 EIR ORGANIZATION

The content and format of this project 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 the full technical studies have been included in the appendices.

The following is a brief overview of the chapters of this EIR:

- **Executive Summary.** This chapter provides a summary of the EIR; a brief description of the proposed project; a summary of areas of controversy; and a summary table identifying significant impacts, proposed mitigation measures, and the significance of impacts after mitigation. A summary of the proposed project alternatives and a comparison of the potential impacts of the alternatives with those of the proposed project are also provided.
- **Chapter 1, Introduction.** This chapter contains an overview of the legal authority, purpose, and intended uses of the EIR, as well as its scope and content. It also provides a discussion of the CEQA environmental review process, including public involvement and known areas of controversy.
- **Chapter 2, Environmental Setting.** This chapter describes the precise location of the project with an emphasis on the physical features of the site and the surrounding areas. In addition, the section provides a local and regional description of the environmental setting of the project, as well as the applicable land use plans.
- **Chapter 3, Project Description.** This chapter provides a detailed discussion of the proposed project, including background, objectives, and key features.
- **Chapter 4, History of Project Changes.** This chapter outlines the history of the project and any physical changes that were made to the project in response to environmental concerns identified during the review of the project (i.e., in response to City's review of the project, the NOP, feedback from the wildlife agencies, the public scoping meeting, or during the public review period for the Draft EIR).
- **Chapter 5, Environmental Analysis.** This chapter provides a detailed evaluation of the potential environmental impacts associated with the proposed project. The topics analyzed in this section include land use, transportation, air quality and odor, biological resources, energy, geologic conditions, greenhouse gas emissions, health and safety, historical resources, hydrology, noise, paleontological resources, population and housing, public services and facilities, public utilities, tribal cultural resources, visual effects and neighborhood character, water quality, and wildfire. The analysis of each issue begins with a discussion of the existing conditions, regulatory framework, and a statement of the specific thresholds used to determine the significance of impacts, followed by an evaluation of potential impacts and identification of specific mitigation measures to avoid or reduce

significant impacts (if any). A statement regarding the significance of the impact after mitigation is also provided when applicable.

- **Chapter 6, Cumulative Impacts**. This chapter analyzes the proposed project in addition to other cumulative projects in the surrounding area to determine potential impacts as a result of all the projects being implemented. Some topics are inherently cumulative, such as greenhouse gas emissions, and those topics are detailed in Chapter 5 with summaries provided in Chapter 6.
- **Chapter 7, Effects Found Not to Be Significant.** This chapter describes issue areas that were determined to be less than significant during the initial study phase for the proposed project and were not analyzed in detail as part of the EIR. This includes mineral resources and agricultural and forestry resources.
- **Chapter 8, Mandatory Discussion Areas.** This chapter evaluates the potential influence the proposed project may have on economic or population growth within the project vicinity and the region, either directly or indirectly. It identifies all of the issues determined in the scoping and preliminary environmental review process to not be significant and briefly summarizes the basis for these determinations. It also identifies impacts that are significant and unavoidable or irreversible, as well as describes mandatory findings of significance.
- **Chapter 9, Alternatives.** This chapter provides a description of the alternatives to the proposed project, including the No Project/No Development Alternative, Development Under the Existing Zoning Alternative, Development Under the Existing Community Plan Alternative, and Reduced Footprint Alternative.
- **Chapter 10, Mitigation Monitoring and Reporting Program.** This chapter identifies significant impacts and the mitigation measures that would help to reduce such impacts. Required in this chapter are the following: (1) the department responsible for monitoring, (2) the monitoring and reporting schedule, and (3) the completion requirements**.**
- **Chapter 11, References Cited.** This chapter lists all of the references cited in the EIR.
- **Chapter 12, Individuals and Agencies Consulted.** This chapter identifies all the agencies, organizations, and individuals responsible for the preparation of the EIR.

Technical Appendices

Technical reports, used as a basis for much of the environmental analysis in the EIR, have been summarized in the EIR as outlined in Section 15147 of the CEQA Guidelines and are included as appendices to this EIR. The technical reports prepared for the proposed project and their location in the EIR are listed in the table of contents.

Incorporation by Reference

As permitted by CEQA Guidelines Section 15150, this EIR references several technical studies and reports. Information from these documents is briefly summarized in this EIR, and their relationships to this EIR are described in the respective chapters. All reference materials are included in Chapter 11, References, and are hereby incorporated by reference.

1.3 PUBLIC REVIEW PROCESS

The City, as the lead agency, is responsible for the preparation and review of this EIR. The EIR review process occurs in two basic stages. The first stage is the Draft EIR, which offers the public, agencies, and organizations the opportunity to comment on the document, and the second stage is the Final EIR with incorporated comments, responses to comments, and final revisions, which will be considered by the decision maker when it evaluates the proposed project.

1.3.1 DRAFT EIR

In accordance with CEQA Guidelines Section 15105, the Draft EIR is distributed for review to interested parties and trustee and responsible agencies for a review period of 45 days. The document is also available for review by the public. The purpose of the review period is to allow the public an opportunity 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 and mitigated" (14 CCR 15204). In accordance with CEQA Guidelines Sections 15085 and 15087(a)(1), upon completion of the Draft EIR, a notice of completion will be filed with the State Clearinghouse and a notice of availability of the Draft EIR will be issued in a newspaper of general circulation in the area. The EIR and all supporting technical studies and documents are available for review at the City of San Diego, Development Services Department, 550 W C St, 12th Floor, San Diego, CA 92101. An electronic copy of the EIR and the technical appendices are posted on the City's website at www.sandiego.gov/ceqa/draft.

1.3.2 FINAL EIR

Comments addressing the scope and adequacy of the environmental analysis will be solicited during the Draft EIR public review period. Following the end of the public review period, the City, as the lead agency, will provide written responses to relevant comments received on the Draft EIR per CEQA Guidelines Section 15088. All comments and responses will be considered in the review of the EIR. In addition to the Final EIR, a mitigation monitoring and reporting program, findings of fact, and a statement of overriding considerations for any impacts identified in the EIR as significant and unmitigable will be prepared. The Final EIR will be available for public review for at least 10 days for responsible agencies, according to CEQA, and prior to the first hearing in accordance with the City's Land Development Code, Section 128.0310. The culmination of this process is a public hearing

where the decision maker will determine whether to certify the Final EIR and adopt the mitigation monitoring and reporting program, findings of fact, and statement of overriding considerations.

CHAPTER 2 ENVIRONMENTAL SETTING

This chapter provides a description of existing site conditions for the proposed Renzulli Estates Project (project). The existing setting addresses the project site and provides an overview of the local and regional environmental setting, per Section 15125 of the California Environmental Quality Act (CEQA) Guidelines.

2.1 PROJECT LOCATION

The project would be located on an approximately 40.56-acre site, at 11495 Cypress Canyon Road (Assessor's Parcel Number 319-020-04-00) (project site) in the City of San Diego (City), within the Scripps Miramar Ranch Community Plan (Community Plan) Area. The project site is surrounded by existing residential development that is mostly single-family to the north, west, and northeast; multifamily residential development to the southeast; undeveloped open space (including a canyon and intermittent creek) to the south; and Cypress Canyon Park to the east. The northwestern and southeastern corners of the project site border Cypress Canyon Road. Additionally, the project is approximately 2.5 miles east of Interstate (I) 15, 0.5 miles south of Scripps Poway Parkway, 0.1 miles west of Cypress Canyon Park Drive, and 0.1 miles north of Spring Canyon Road in the northeast portion of the City (Figure 2-1, Project Location).

2.2 ENVIRONMENTAL SETTING

2.2.1 PROJECT SITE

The majority of the project site is undeveloped, with some development present in the center of the site. More specifically, the project site supports a large existing residence and one associated shed in the center of the project site, as well as a second shed north of the residence. The structures are accessible via the segment of Cypress Canyon Road that connects to Cypress Canyon Park Drive to the southeast. In addition, two three-car garages and various abandoned vehicles, RVs, and trailers are located within the center of the project site, near the existing residence. Finally, there is an additional large metal building (approximately 5,000 square feet) located approximately 400 feet north of the main house. The metal building is in a canyon, approximately 90 feet lower in elevation than the main house.

Additionally, there is a cleared, paved area in the center of the site. Various unpaved roads are also scattered throughout the project site. A Multi-Habitat Planning Area (MHPA) identified for 75% conservation by the San Diego Multiple Species Conservation Program (MSCP) covers 33.40 acres of the project site.

A total of 13 vegetation communities are located on the project site. Native vegetation found on the project site includes Diegan coastal sage scrub (including disturbed), Diegan coastal sage scrub (*Baccharis*-dominated), coastal sage–chaparral transition, flat-topped buckwheat scrub, southern mixed chaparral (including disturbed), and scrub oak chaparral. Non-native vegetation communities found on the project site include disturbed habitat, eucalyptus woodland, urban/developed land, and *Arundo*-dominated disturbed habitat. Additionally, the project site contains wetland habitat including emergent wetland, herbaceous wetland (artificial), and natural flood channels. However, these are not considered City wetlands in accordance with the City's Biology Guidelines (City of San Diego 2018). Refer to Section 5.4, Biological Resources, for further details.

Topography varies greatly throughout the project site, but is generally steep and hilly, with lowland canyon bottoms in the southern and northern portions of the project site. The elevation in the project site ranges from approximately 760 feet to 980 feet above mean sea level.

The project site surface includes residual soils, artificial fill, questionable landslides, slope wash, colluvium, and alluvium underlain by Tertiary-aged sedimentary bedrock of the Poway Group and associated residual soils. Refer to Section 5.6, Geologic Conditions, for further details.

2.2.2 SURROUNDING ENVIRONMENT

As discussed above, the project site is surrounded by existing residential development that is mostly single-family to the north, west, and northeast; multifamily residential to the southeast; undeveloped open space to the south; and Cypress Canyon Park to the east. Various additional open space areas are intermixed throughout the single-family residential developments that generally surround the project site. The St. Gregory the Great Catholic Church and Harbor Church are located approximately 0.35 miles west of the project site. In addition, the project site is near a variety of commercial uses and employment opportunities, approximately 1 mile to the northeast, in the City of Poway.

Recreational land uses surrounding the site include Cypress Canyon Park (directly east of the project site), Scripps Ranch Community Park (approximately 0.45 miles west of the project site), and the Cypress Valley Tot Lot (approximately 0.22 miles southwest of the project site).

The project site is approximately 2.5 miles east of I-15, 0.5 miles south of Scripps Poway Parkway, and 0.1 miles north of Spring Canyon Road.

2.2.3 SURROUNDING ROADWAY NETWORK

Regional access to the project site is provided by I-15, which runs north–south 2.5 miles to the west of the project site, allowing for vehicular and transit access to the larger San Diego region, as well as

Riverside County to the north. State Route 56 runs east–west approximately 3 miles to the north, where it transitions from Ted Williams Parkway to I-5, also providing regional vehicular access to points west of the project site. The project site is directly accessible via Cypress Canyon Road, which connects to Spring Canyon Road and Pomerado Road to the south. Further details regarding the existing roadway network within and immediately surrounding the project site are discussed in Section 5.2, Transportation.

2.3 PLANNING CONTEXT

The following describes the plans, policies, and regulations that are applicable to the project.

2.3.1 GENERAL PLAN

The City's General Plan is composed of 11 elements that provide a comprehensive slate of citywide policies and further the "City of Villages" smart growth strategy for growth and development. The elements of the General Plan include the Housing Element; Land Use and Community Planning Element; Mobility Element; Urban Design Element; Economic Prosperity Element; Public Facilities, Services, and Safety Element; Recreation Element; Conservation Element; Noise Element; and Historic Preservation Element. The General Plan recognizes and explains the critical role of the community planning program as the vehicle to tailor the City of Villages strategy for each neighborhood. It also outlines the plan amendment process and other implementation strategies and considers the continued growth of the City beyond 2020 (City of San Diego 2008). The project site is designated Park, Open Space, and Recreation and Residential in the General Plan (City of San Diego 2008).

2.3.2 SCRIPPS MIRAMAR RANCH COMMUNITY PLAN

The project is within the Scripps Miramar Ranch Community Plan (Community Plan). The Community Plan Area consists of a 4,365-acre planned community in the northcentral area of the City; it is bordered on the north by the Miramar Ranch North and Sabre Springs planning areas and the City of Poway, on the northeast by the City of Poway, on the east by the currently unplanned future urbanizing area of the City of San Diego, on the south by Miramar Naval Air Station, and on the west by I-15.

A total of 11 Community Plan Elements were developed and included within the Community Plan in order to serve as a guide for development within the Community Plan Area. The 11 Community Plan Elements include the Residential Element; Commercial Element; Industrial Element; Parks, Recreation and Open Space Element; School Element; Public Facilities and Services Element; Transportation Element; Community Environment Element; Social Needs Element; Design Element; and Implementation Element.

The overall land use plan for the Community Plan Area encompasses parcels designated for residential, commercial, industrial, school, public facilities and services, and parks, recreation, and open space. Per the Community Plan, the project site is designated as Residential and Open Space with a density of 3–5 dwelling units per acre, with a maximum of 45 units, resulting in a density of 1.1 dwelling units per acre (Figure 2-2, Existing Community Plan Land Use Designation).

2.3.3 ZONING

The project site is zoned Agricultural-Residential (AR-1-1). The AR zone accommodates a wide range of agricultural uses while also permitting the development of single dwelling unit homes at a very low density; specifically, AR-1-1 requires a minimum of 10-acre lots (Figure 2-3, Existing Zoning).

The project site is within the Affordable Housing Parking Housing Demand (High) Area, Paleontological Sensitivity Area (low), MHPA, Sensitive Vegetation area, Brush Management Zone, High Fire Severity Overlay Zone, and Mobility Zone 4 (City of San Diego 2023 and 2024).

Environmentally Sensitive Lands

The City's Environmentally Sensitive Lands (ESL) Regulations include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and 100-year floodplains. The project site does not contain coastal beaches, sensitive coastal bluffs, or City wetlands. However, the project site does contain 14.64 acres of steep hillsides and 33.40 acres of MHPA (see Figure 2-4, Steep Hillsides, and Figure 2-5, Existing MHPA Boundary) that qualify as ESL.

2.3.4 REGIONAL PLANS

In accordance with Section 15125(d) of the CEQA Guidelines, this environmental setting discussion includes statements related to conformance with applicable regional plans. In addition to the City's General Plan, the following regional plans are assessed for consistency.

Regional Air Quality Plan

The San Diego Air Pollution Control District and San Diego Association of Governments (SANDAG) jointly developed the San Diego Regional Air Quality Strategy (RAQS) to identify feasible emissions control measures to achieve compliance with the state ozone standard. The RAQS addresses volatile organic compounds and oxides of nitrogen, which are the precursors to the photochemical formation of ozone. The current RAQS was initially adopted in 1991 and most recently revised in 2022 (SDAPCD 2022). The San Diego Air Pollution Control District also developed the San Diego Air Basin's input to the State Implementation Plan, which is required under the federal Clean Air Act for areas that are in nonattainment of air quality standards. The RAQS relies on information from the

California Air Resource Board and SANDAG, including mobile area source emissions and information regarding projected growth in the county to project future emissions. The RAQS then determines the strategies necessary for reduction of emissions through regulatory controls. The project would propose development that has been anticipated in local air quality plans. See Section 5.3, Air Quality, for further details.

Water Quality Control Plan for the San Diego Basin

The U.S. Environmental Protection Agency has delegated responsibility for implementation of portions of the Clean Water Act to the State Water Resources Control Board and the Regional Water Quality Control Boards (RWQCBs), including water quality control planning and control programs, such as the National Pollutant Discharge Elimination System program. The National Pollutant Discharge Elimination System program is a set of permits designed to implement the Clean Water Act that apply to various activities that generate pollutants with potential to impact water quality.

The RWQCB adopted a Water Quality Control Plan (Basin Plan) for the San Diego Basin. This Basin Plan sets forth water quality objectives for constituents that could potentially cause an adverse impact on the beneficial uses of water. The Basin Plan is designed to preserve and enhance the quality of water resources in the San Diego region. The purpose of the Basin Plan is to designate beneficial uses of the region's surface waters and groundwater, designate water quality objectives for the reasonable protection of those uses, and establish an implementation plan to achieve the objectives. The Basin Plan incorporates by reference all applicable State Water Resources Control Board and RWQCB plans and policies (RWQCB 2021).

Projects resulting in discharges, whether to land or water, are subject to Section 13263 of the California Water Code and are required to obtain approval of Waste Discharge Requirements from the RWQCB. During construction and operation, private and public development projects are required to include stormwater best management practices to reduce pollutants discharged from the project site.

City of San Diego Multiple Species Conservation Program Subarea Plan

The San Diego MSCP is a long-term regional conservation plan established to protect sensitive species and habitats in San Diego County. The regional MSCP is divided into subarea plans that are implemented separately from one another (County of San Diego 1998). Within the City, the MSCP is implemented through the City of San Diego MSCP Subarea Plan (Subarea Plan) (City of San Diego 1997). The Subarea Plan encompasses 206,124 acres within the MSCP area. The Subarea Plan area is characterized by urban land uses, with approximately three-quarters of the area either built out or retained as open space/park system. The project site is within the Urban Area of the Subarea Plan.

The MSCP established the MHPA preserve system, designed to conserve large blocks of interconnected habitat having high biological value. The City MHPA is a hardline preserve developed by the City in cooperation with the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife, property owners, developers, and environmental groups. The MHPA identifies biological core resource areas and corridors targeted for conservation, in which only limited development may occur (City of San Diego 1997). The MHPA is considered an urban preserve that is constrained by existing or approved development and is composed of habitat linkages connecting several large core areas of habitat. The criteria used to define core and linkage areas involves maintaining ecosystem function and processes, including large animal movement. Each core area is connected to other core areas or to habitat areas outside the MSCP, either through common boundaries or through linkages. Core areas have multiple connections to help ensure that the balance in the ecosystem will be maintained. Critical habitat linkages between core areas are conserved in a functional manner, with a minimum of 75% of the habitat within identified linkages conserved (City of San Diego 1997). Urban habitat areas within the MHPA include existing designated open space such as Mission Bay, Tecolote Canyon, Marian Bear Memorial Park, Rose Canyon Open Space Park, San Diego River, the southern slopes along Mission Valley, Carroll and Rattlesnake Canyons, Florida Canyon, Chollas Creek, East Elliott, Mission Trails Regional Park, and a variety of smaller canyon systems.

The MHPA overlaps with 33.40 acres of the project site and extends outside the project site. Refer to Figure 2-5. The on-site MHPA includes Diegan coastal sage scrub, eucalyptus woodland, southern mixed chapparal, and scrub oak chapparal. Refer to Section 5.4 for further details. The adjacent MHPA habitat in the areas surrounding the project site is composed of various non-linear patches that overlap with existing residential development in some sections.

San Diego Forward – Regional Plan

Every four years, SANDAG prepares a Regional Plan in collaboration with the 18 cities and the County of San Diego, along with regional, state, and federal partners. This is a broad-based community effort that plans for how the region will grow and how its people will get around. The Regional Plan addresses many important issues, including using land more wisely, building an efficient and more accessible transportation system, protecting the environment, improving public health, promoting a strong regional economy, better managing our access to energy, incorporating equity into the planning process, addressing pressing needs on tribal lands, and supporting a vibrant international border. The most recent regional plan is the 2021 Regional Plan, which builds off the 2019 San Diego Forward Federal Transportation Plan (SANDAG 2021). The 2021 Regional Plan is the long-term blueprint for the San Diego region that seeks to meet regulatory requirements, address traffic congestion, and create equal access to jobs, education, healthcare, and other community resources. The SANDAG Board of Directors adopted the 2021 Regional Plan on December 10, 2021.

City of San Diego Climate Action Plan

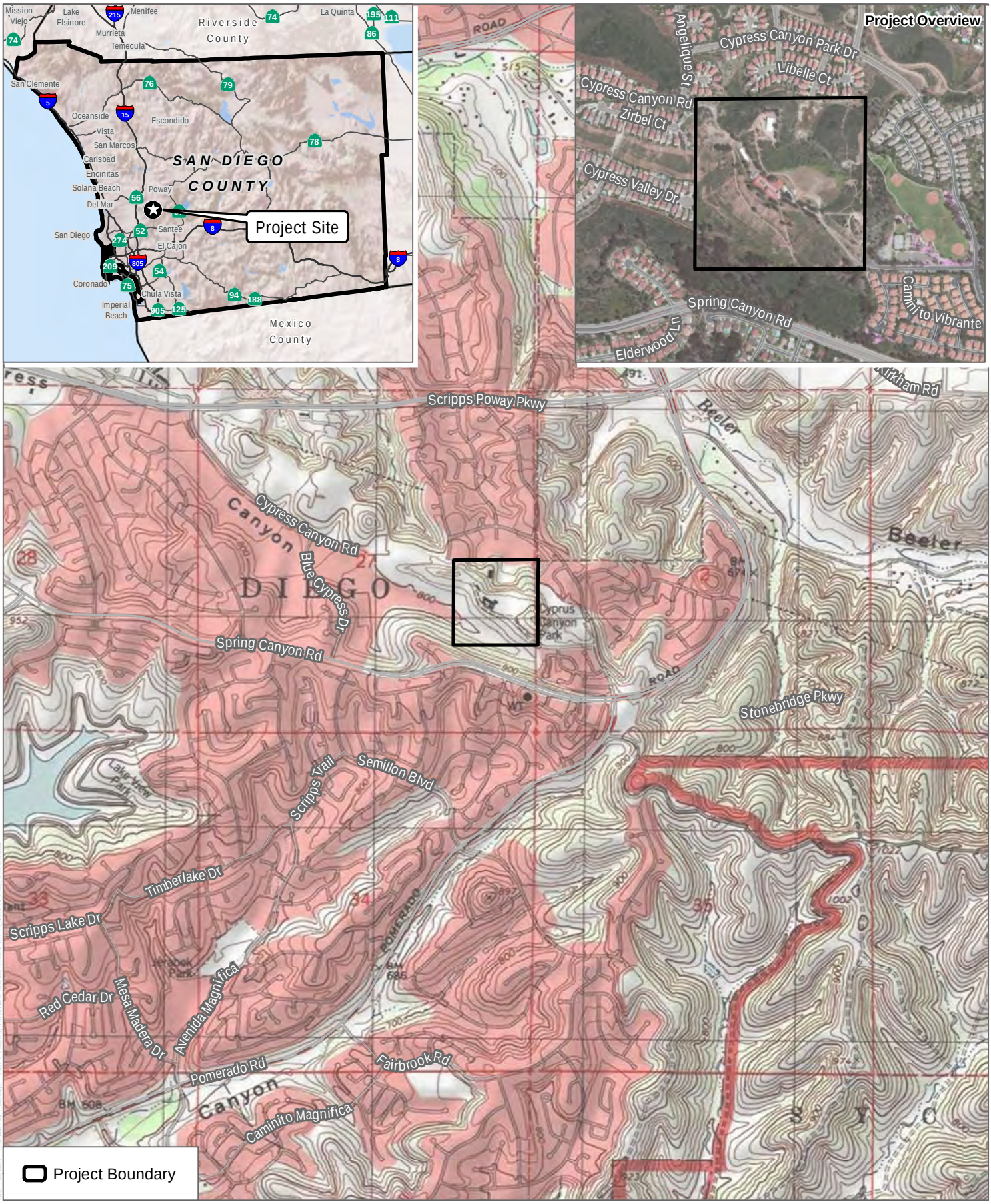
Pursuant to Executive Order S-3-05 and Assembly Bill 32, which set greenhouse gas reduction targets, as well as the California Air Resources Board Scoping Plan, the City adopted a Climate Action Plan (CAP) (City of San Diego 2015). Projects that are consistent with the CAP and associated assumptions may rely on the CAP to address cumulative greenhouse gas impacts. Projects that are inconsistent with the CAP require a comprehensive project-specific analysis of greenhouse gas emissions and the incorporation of measures to reduce potential impacts to the extent feasible. Cumulative greenhouse gas impacts would be significant for any project that is not consistent with the CAP. The CAP land use assumptions were based on the SANDAG Series 12 growth projections, which assumed the project site was open space. The project would be inconsistent with the CAP, as detailed in Section 5.7, Greenhouse Gas Emissions. Refer to Section 5.7 for further details.

Complete Communities: Housing Solutions and Mobility Choices

The City recently adopted two new ordinances, collectively referred to as Complete Communities: Housing Solutions and Mobility Choices. Regulations for Complete Communities: Mobility Choices can be found in San Diego Municipal Code Chapter 14, Article 3, Division 11. General Regulations for Complete Communities: Housing Solutions can be found in San Diego Municipal Code Chapter 14, Article 3, Division 10. These ordinances are intended to encourage building residential uses near high-frequency transit, as well as providing transit, bicycle, and pedestrian-oriented improvements within communities of concern where the need for mobility choices is the greatest. As a part of this effort, the City has designated Mobility Zones and an Active Transportation In-Lieu Fee Program that collects fees from development projects to provide for mobility improvements. The City has tied this information into the City's Transportation Study Manual and updated City CEQA transportation significance thresholds. The adoption of the Active Transportation In-Lieu Fee Program regulations (Resolution R-313281 and Ordinance O-21274) specifically indicate these ordinances do not apply to projects "deemed complete prior to the date on which the applicable provision of this Ordinance become effective." The project was deemed complete after the Complete Communities: Mobility Choices Ordinance became effective on January 8, 2021, outside of the Coastal Zone; therefore, the Complete Communities: Mobility Choices Ordinance is applicable to the project. However, the Complete Communities: Housing Solutions Ordinance does not apply to the project considering the project is not within a Transit Priority Area and is not zoned for multiple dwelling units.

The Complete Communities: Play Everywhere program related to recreational needs was adopted in August 2021. However, the "Infrastructure Now" component related to providing public facilities across all communities is in process at the City and is not currently adopted.

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SOURCE: USGS 7.5-Minute Series Poway Quadrangle

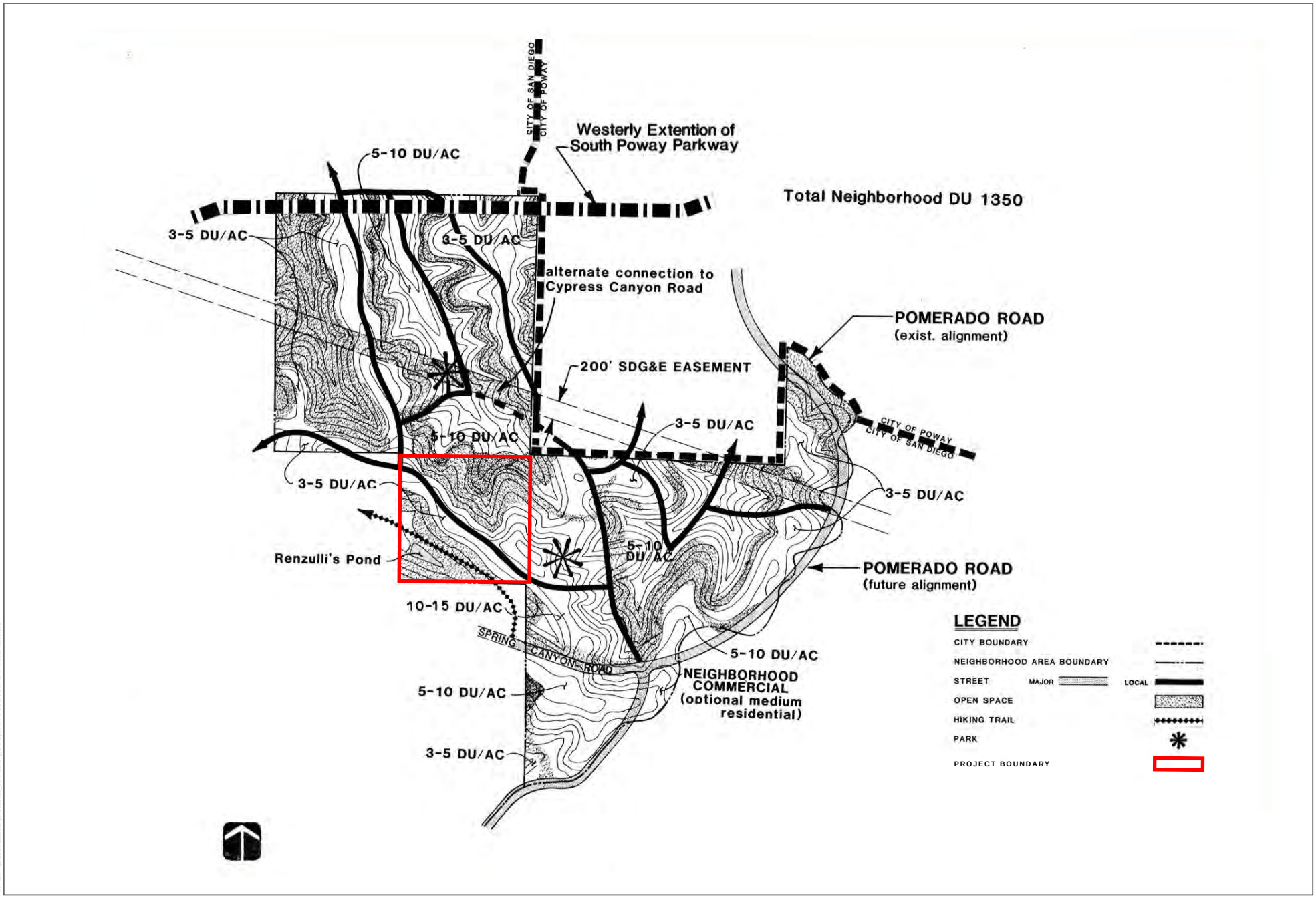
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FIGURE 2- 1

Project Location

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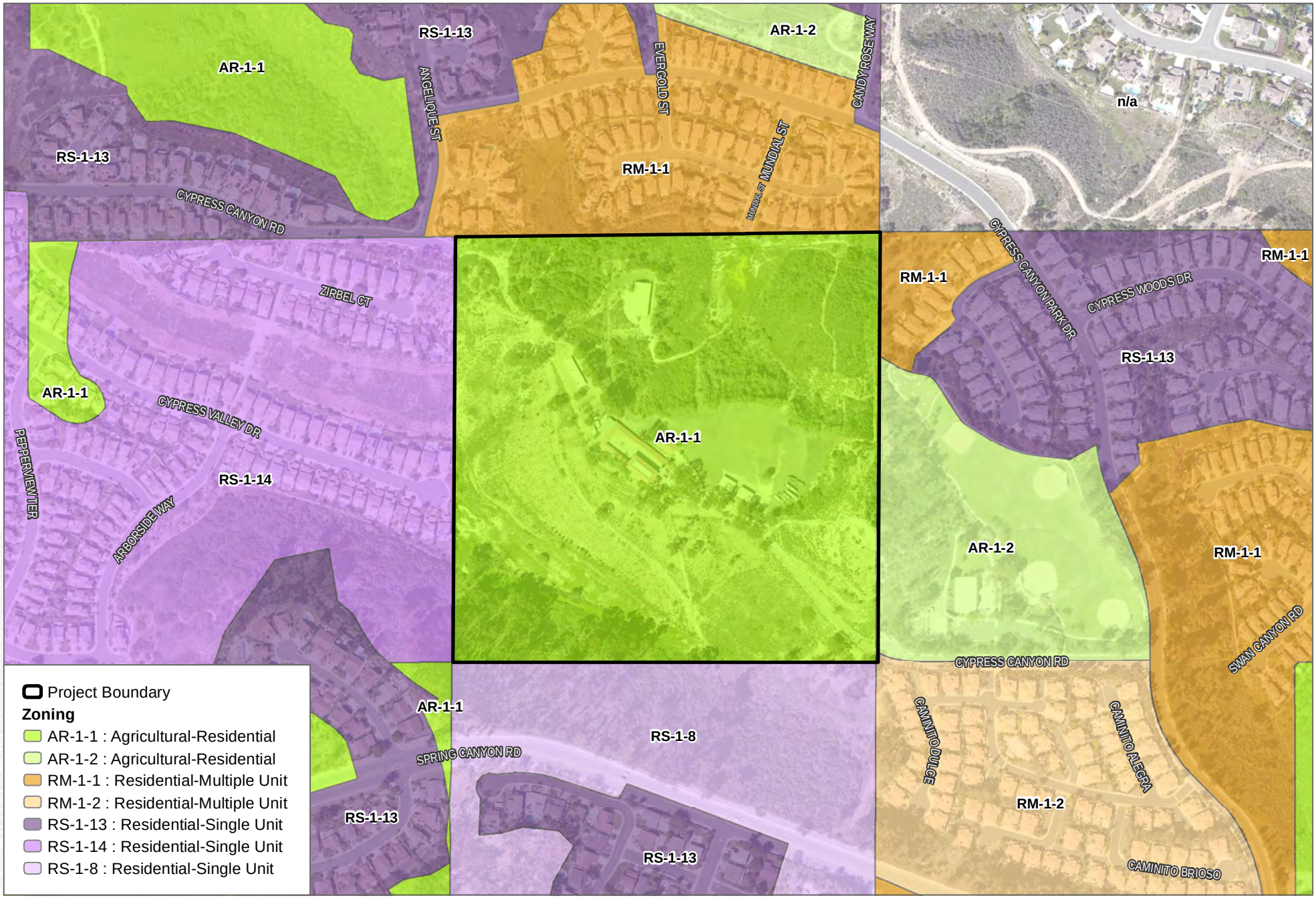
SOURCE: City of San Diego

FIGURE 2-2

Existing Community Plan Land Use Designation

EIR for the Renzulli Estates Project, City of San Diego, California

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SOURCE: SANGIS 2017

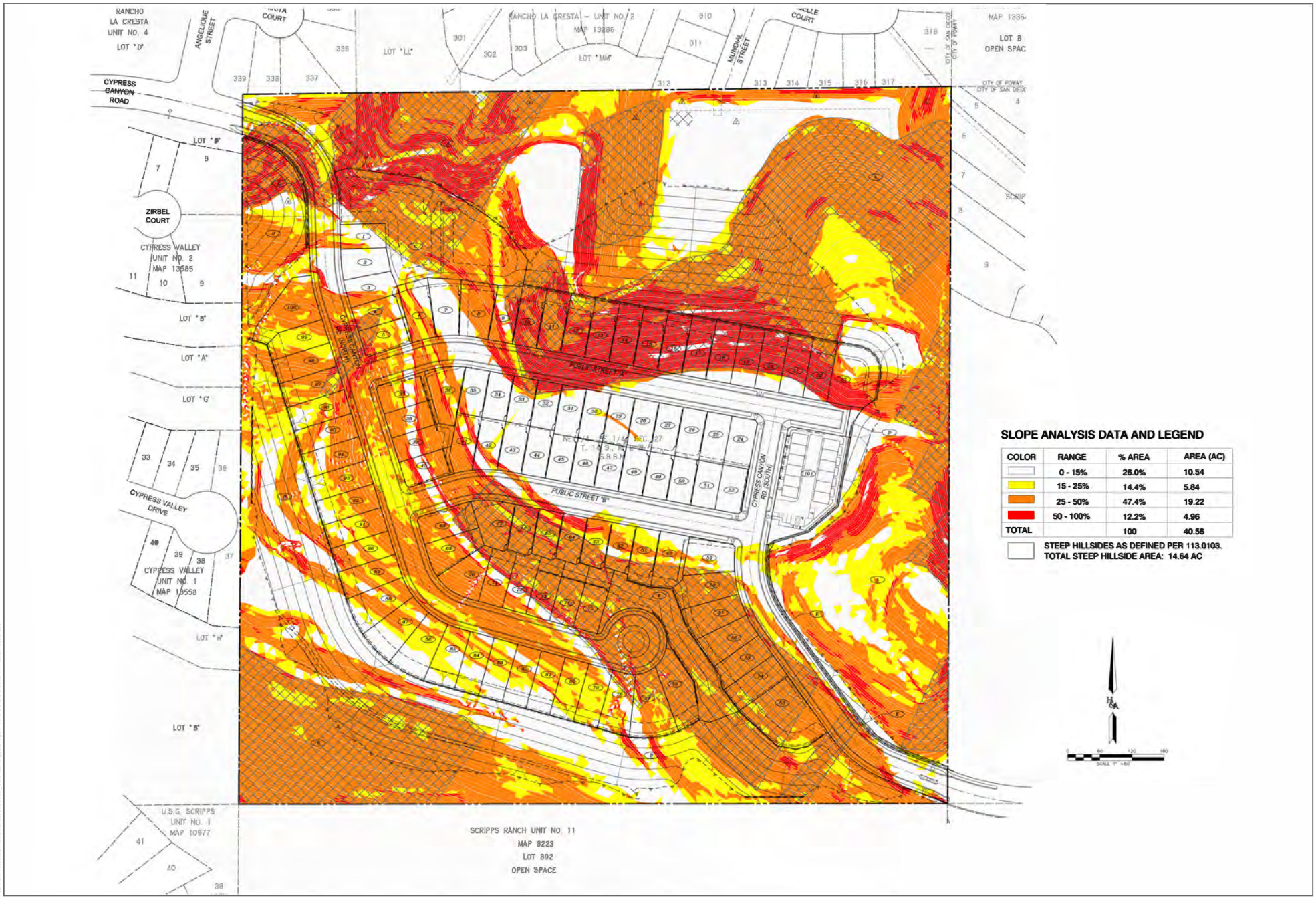
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FIGURE 2-3

Existing Zoning

EIR for the Renzulli Estates Project, City of San Diego, California

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SOURCE: Hunsaker 2023

FIGURE 2-4

Steep Hillsides

EIR for the Renzulli Estates Project, City of San Diego, California

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SOURCE: SANGIS 2020

FIGURE 2-5

Existing MHPA Boundary

EIR for the Renzulli Estates Project, City of San Diego, California

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CHAPTER 3 PROJECT DESCRIPTION

3.1 INTRODUCTION

This chapter of the Renzulli Estates Project (project) Environmental Impact Report provides a statement of project goals and objectives, describes the specific characteristics of the project, discusses project construction and phasing, and identifies the discretionary actions necessary to implement the project. This chapter has been prepared pursuant to Section 15124 of the California Environmental Quality Act Guidelines.

3.2 PROJECT OBJECTIVES

The underlying purpose of the project is to provide a housing development on an underutilized infill site within the community of Scripps Miramar Ranch, in the City of San Diego (City), California. Project implementation would be guided by the following project objectives:

1. Redevelop an underutilized site to contribute housing to the City of San Diego in response to regional housing needs.
2. Construct a variety of housing types at a density range that maximizes development potential consistent with the surrounding residential communities.
3. Provide additional affordable housing units to assist in meeting state and local needs.
4. Provide street improvements to connect the current termini of Cypress Canyon Road through the project site.
5. Implement a housing project that integrates with the Scripps Miramar Ranch community and has a cohesive design that is compatible in use, scale, and character with the surroundings.
6. Integrate the project into the existing topography of the site and cluster development in a manner that reduces the grading footprint, as well as impacts to environmental resources, and maximizes the preservation of the most biologically valuable resources on the project site.

3.3 PROJECT COMPONENTS

The project proposes the demolition of the existing residential unit and supporting structures, grading, and development of 100 single-family homes and 12 multifamily affordable rental units (Figure 3-1, Site Plan). In addition, the proposed project would preserve 24.47 acres on site within the Multi-Habitat Planning Area (MHPA), as well as 18.7 acres off site within the City, east of Regents Road and west of Pocahontas Avenue. The project includes landscaping and brush management; a boundary line adjustment; circulation, parking, and access; utilities; and sustainability features. The

project also includes conditions of approval and discretionary actions. Each project component is described below.

3.3.1 RESIDENTIAL DEVELOPMENT

The project would construct 100 single-family homes and 12 multifamily affordable rental units. The single-family homes would be two stories and a maximum of 35 feet tall. The multifamily building would be three stories with a maximum height of 40 feet. Figures 3-2a through 3-2f, Architectural Styles, show examples of the anticipated building styles. The project is requesting deviations from the San Diego Municipal Code (SDMC) to increase the height limit for development within the Residential–Small Lot (RX)-1-2 zone from 30 to 35 feet for the proposed buildings and from 30 to 36 feet for the proposed retaining wall. Additionally, the project proposes a deviation from SDMC Section 142.0560(j)(1), Tables 142-05N and 142-05M , which identifies the minimum required and maximum allowed driveway widths (outside a Parking Impact Overlay Zone) for a detached single dwelling unit (lot widths 50 feet or less) as 12 feet and 20 feet, respectively, and for a detached single dwelling unit (lot widths greater than 55 feet) as 12 feet and 25 feet, respectively. Additionally, per standard drawing SDG-164, which is referred to in SDMC Section 142.0560(j)(3), curb openings shall not exceed 40% of the property frontage. Although the proposed 16-foot-wide driveway falls within the driveway width allowed, a deviation is requested due to the proposed 22-foot-wide (16-foot driveway plus 3-foot flare on each side) curb opening exceeding the 40% max frontage for a curb opening of any lot less than 55 feet wide (91 of the 100 total single-family residential lots in this subdivision).

3.3.2 OPEN SPACE AND BOUNDARY LINE ADJUSTMENT

3.3.2.1 Open Space

The project includes 20.42 acres of open space within the MHPA and 0.14 acres outside of the MHPA within the project site. The 20.42 acres of open space area would remain within the MHPA following construction and be dedicated in fee title to the City upon successful completion of restoration activities. See Section 5.4, Biological Resources, for additional details.

3.3.2.2 Boundary Line Adjustment

The project includes a boundary line adjustment (BLA) to remove the portion of the proposed development area from the City's MHPA. The MHPA removal area would be 13.72 acres. The BLA addition area includes 0.80 acres on site and 18.7 acres off site. The BLA would result in 20.42 acres of MHPA remaining on site following restoration and a net gain of 5.79 acres to the City's overall MHPA preserve. The project site is mostly undeveloped with the exception of an existing single-family residence and several outbuildings. The MHPA removal area currently consists of developed land, eucalyptus woodland, disturbed habitat, natural flood channel (not City wetland), Arundo-

dominated disturbed habitat, scrub oak chaparral, emergent wetland, flat-topped buckwheat scrub, Diegan coastal sage scrub (including disturbed variety), coastal sage-chaparral transition, and southern mixed chaparral (including disturbed variety).

The off-site MHPA addition area consists of Assessor's Parcel Nos. 359-210-09-00, 359-210-10-00, and 359-210-11-00 and is a total of 18.7 acres and is shown in Figure 3-4. The proposed MHPA BLA addition site is located within the City, east of Regents Road and west of Pocahontas Avenue. Preservation of suitable native habitats present on site and at the off-site addition area would provide an offset to the removal of sensitive vegetation communities from the MHPA as a result of the project. The MHPA areas would be dedicated to the City through fee title. The applicant would be required as a condition of approval to complete a City-approved Property Analysis Record or equivalent analysis to evaluate the maintenance costs to preserve the habitat and provide an endowment to fund the ongoing maintenance costs in perpetuity. Long-term management of the MHPA area after successful completion of restoration activities would be provided in perpetuity by the City. In addition, a right-of-way vacation would be processed for the off-site MHPA addition area as part of the project for the section of the planned Lakehurst Avenue right-of-way (not yet built).

3.3.3 LANDSCAPING AND BRUSH MANAGEMENT ZONES

The project would include a landscape plan with drought-tolerant native vegetation and low water use plants. The landscape plan would not include invasive plant species, as identified by the California Invasive Plant Council. The proposed landscaping is shown on Figures 3-3a through 3-3c, Proposed Landscape Plan. The landscape scheme would include a range of tree types and forms, including vertical columnar trees, small accent trees, and large shade-producing canopy trees. In addition, the landscaped areas would contain shrubs of varying heights. Native vegetation would be used to revegetate graded areas in accordance with SDMC 142.0402, Landscape Regulations. Manufactured slopes constructed on site would be restored with a palette that would incorporate native plant species typical of coastal sage scrub and chaparral habitats; barrel cactus individuals from other areas of the proposed development footprint would also be transplanted to the slope. An on-site Barrel Cactus Translocation Area is proposed within the manufactured slope area. The proposed landscaping would be designed in accordance with SDMC 142.0402 and the Land Development Manual, Landscape Standards (City of San Diego 2016). A detailed landscape plan and plant palette would be submitted to the City Landscaping Section and the San Diego Fire-Rescue Department for review and approval prior to the issuance of building permits. As required through the brush management regulations, no highly flammable plant species shall be used within the proposed ornamental landscaping.

Brush management zones (BMZs) would be provided around all new single-family and multifamily development lots within the project development that are adjacent to open space areas in

accordance with Section 142.0412 of the SDMC, Brush Management, and Section 104.9 of the 2019 California Fire Code. A typical landscape/brush management program in the City consists of a 35-foot-wide, fully irrigated Zone 1 and a 65-foot-wide, non-irrigated, thinned Zone 2. However, based on site-specific limitations, including the project being adjacent to MHPA areas, lot constraints, project boundary limitations, and steep slopes adjacent and below the residential lots, the project would incorporate one fully irrigated Zone 1, extending up to 57 feet from the single-family structures and up to 80 feet from the multifamily units to the point where manufactured slopes transition from 4:1 to 2:1. BMZ 1 would extend between 44 feet and 57 feet around the perimeter lots in the southern portion of the project site, measured from the rear of the structures to the point where manufactured slopes transition from 4:1 to 2:1; 47.5 feet around the perimeter lots in the northern portion of the project site, measured from the rear of the structures to the point where manufactured slopes transition from 4:1 to 2:1; and between 15 and 80 feet around the perimeter multifamily units in the eastern portion of the site, measured from the rear of the structures to the point where manufactured slopes transition from 4:1 to 2:1.

The strip of land between the manufactured slope and the western property boundary of Lot 100 is a homeowner's association–maintained open space area.

All single-family lots around the perimeter of the project development area that do not achieve a full 100 feet of on-site BMZs would include code exceeding dual pane dual tempered windows and an additional layer of 5/8-inch Type X fire rated gypsum sheathing applied behind the exterior covering or cladding (stucco or exterior siding) on the exterior side of the framing, from the foundation to the roof for a facade facing the open space and naturally vegetated area. The project would also include the construction of a 6-foot-tall concrete masonry unit fire wall near the top of the manufactured slopes to block or deflect all or part of the radiating heat with a vertical, non-combustible surface placed in the line of heat, fumes, flame, and embers, thus making narrower fuel modification distances possible.

The perimeter multifamily units that do not achieve a full 100 feet of on-site BMZs would also include the installation of code exceeding dual pane dual tempered windows and an additional layer of 5/8-inch Type X fire rated gypsum sheathing applied behind the exterior covering or cladding (stucco or exterior siding) on the exterior side of the framing, from the foundation to the roof for a facade facing the open space and naturally vegetated areas. This area of the project site would also include the construction of a soil nail wall and a 20-foot-plus tall retaining wall that would act as a fire wall. The project is requesting a deviation from the SDMC to increase the height limit for development within the RX-1-2 zone from 30 to 36 feet for the proposed retaining wall. The installation of the dual pane dual tempered windows and extra layer of 5/8-inch Type X fire rated gypsum sheathing on the wildland exposed sides of the structures, along with the construction of a 6-foot concrete masonry unit fire wall, would act as alternative compliance measures to compensate

for the reduced brush management areas of the perimeter lots and would be in compliance with the City of San Diego Fire Protection Bureau Policy B-18-01, Mitigation for Reduced Brush Management Zones (Section V.C.1).

3.3.4 CIRCULATION, PARKING, AND ACCESS

The project's circulation system is designed to interconnect with the existing adjacent public street system to be consistent with the Scripps Miramar Ranch Community Plan (Scripps Miramar Ranch Planning Committee et al. 2018). Under existing conditions, the project site can be accessed via Cypress Canyon Road from the southeast. As part of the project, Cypress Canyon Road would be extended through the project site. More specifically, Cypress Canyon Road (South) would be extended to the north until it reaches Street A while Cypress Canyon Road (North) would be extended southeast from the northwest of the site until it reaches a cul-de-sac. Cypress Canyon Road (North) and Cypress Canyon Road (South) would be connected by proposed Streets A and B, which would run east to west through the project site (see Figure 3-1). Upon completion, access to the project site would be provided via Cypress Canyon Road from the southeast and northwest. Proposed street cross sections are shown in Figure 3-5.

The project would provide two garage parking spaces for all single-family units. The multifamily portion of the development would have 28 automobile parking spaces, including 24 garage spaces, 2 visitor spaces, 1 electric vehicle space, 1 accessible space, and 3 motorcycle spaces.

3.3.5 UTILITIES

Below is a description of each proposed utility improvement.

Water System

The existing and proposed water system is shown in Figure 3-6, Existing and Proposed Water Facilities. Each building within the project is proposed to have a private domestic water system and a private fire protection water system. In accordance with City standards, private domestic water systems would include a meter and backflow preventer, and private fire protection systems would include backflow preventers. Water lines would be constructed within each proposed roadway and would vary from 8 to 16 inches. The proposed water system would connect to the existing 16-inch water line via 16-inch piping at the intersection of Angelique Street and Cypress Canyon Road to the north. To the south, the project's water system would connect to an existing 16-inch water line within the existing Cypress Canyon Road.

Wastewater System

The existing and proposed water system is shown in Figure 3-7, Existing and Proposed Wastewater Facilities. The project would construct new 8-inch gravity sewer lines within all proposed roadways and would connect to the City's existing sewer system at the corner of Cypress Canyon Road and Angelique Street to the north. From this connection, wastewater would gravity flow north towards Scripps Poway Parkway, and then north along Briarleaf Way and Springhurst Drive and ultimately along Sabre Springs Parkway. Wastewater collection and the City's sewage system are maintained and operated by the City's Public Works Department to ensure sufficient capacity is available for dry weather peak-flow conditions and storm or wet weather events.

Stormwater System

The project would include storm drains, curb inlets, and cleanouts along all proposed roads and parking spaces on site to collect and convey storm runoff. From there, the majority of runoff generated by the project would be conveyed and treated into the two proposed biofiltration basins, which would be located in the northwestern portion of the site. Runoff would then be conveyed within the bypass storm drain and discharged north into the existing 24-inch storm drain within Mundial Street and southeast into an underground storm drain within Cypress Canyon Road.

The remaining portion of the runoff, generated at the northwest corner of the project site, is associated with the proposed Cypress Canyon Road (North). The existing drainage at this location consists of two concrete ditches on each side of Cypress Canyon Road, which accept runoff from the site and discharge into two storm drain inlets at Cypress Canyon Road and Angelique Street. Two storm drain inlets are proposed at the end of Cypress Canyon Road (North) to capture the peak flow generated from this location and two filterra unit structures would be installed at these two inlets in order to address water quality. Once treated in the filterra unit structures, runoff would be conveyed north, via the existing storm drain inlets at Cypress Canyon Road and Angelique Street (see Figure 3-8, Proposed Drainage Plan). Lastly, a channel is proposed in the southwestern portion of the site, within the manufactured slope area, to convey runoff from the existing undisturbed slopes on the southwestern portion of the site. All drainage facilities would be constructed per City standards. Drainage easements shall be provided as required. Development of the project shall comply with all stormwater construction requirements of the General Permit and the Municipal Storm Water Permit.

Dry Utilities

Electrical power and natural gas would be provided by San Diego Gas & Electric. No major improvements to the local distribution networks are anticipated to be needed to support the increase in units that would be introduced by the project. The proposed development within the project site

would be required to comply with the California Energy Code (Title 24 of the California Code of Regulations) and California Green Building Standards Code, as part of project conditions. The applicant would work with dry utility providers to ensure utility systems have adequate capacity to serve the project. Telephone, cable TV, and internet service would be available from a variety of providers.

3.3.6 DEMOLITION, GRADING, AND CONSTRUCTION

Demolition, grading, and construction would take approximately 53 months. Construction of the project would include grading, utility construction, building construction, road construction, paving/landscaping improvements, and architectural coatings. The project was assumed to be constructed in one phase and was based on the following assumptions (durations are approximate):

- Demolition: 2 months
- Site preparation: 1 month
- Grading: 13 months
- Building construction: 31 months
- Paving: 3.5 months
- Architectural coatings: 2.5 month

The phases listed above would occur sequentially. Refer to Appendix C, Air Quality Report, for further details regarding construction equipment modeling assumptions (see Section 5.3, Air Quality).

The construction equipment mix used for estimating the construction emissions of the proposed project is based on California Emissions Estimator Model default values per construction phase and is shown in Table 3-1.

Table 3-1
Construction Scenario Assumptions

	One-Way Vehicle Trips			Equipment		
Construction Phase	*Average Daily Worker Trips*	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Demolition	16	4	196	Concrete Industrial Saws	1	8
				Excavators	3	8

Table 3-1
Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
				Rubber Tired Dozers	2	8
Site Preparation	18	4	0	Rubber Tired Dozers	3	8
				Tractors/ Loaders/ Backhoes	4	8
Grading	20	4	2,312	Excavators	2	8
				Graders	1	8
				Rubber Tired Dozers	1	8
				Scrapers	2	8
				Tractors/ Loaders/ Backhoes	2	8
Building Construction	82	28	0	Cranes	1	7
				Forklifts	3	8
				Generator Sets	1	8
				Tractors/ Loaders/ Backhoes	3	7
				Welders	1	8
Paving	16	0	0	Pavers	2	8
				Paving Equipment	2	8
				Rollers	2	8
Architectural Coating	104	0	0	Air Compressors	1	6

Note: See Appendix C for details**.**

3.3.6.1 Demolition

The project includes the demolition of the existing 22,457-square-foot residential structures prior to grading and construction. As the structures were first built in 1935, there is potential for asbestos-containing materials and lead-based paint. Any asbestos-containing materials or lead-based paint to

be demolished would be handled in accordance with applicable laws and regulations, including San Diego Air Pollution Control District Regulation XI, Subpart M; California Occupational Safety and Health Administration asbestos rules; California Department of Public Health lead laws and regulations; and California Environmental Protection Agency disposal requirements. As required via a condition of approval, all demolition waste would be handled in accordance with the project's Waste Management Plan (Appendix M3; see PDF-UTIL-1 in Section 3.3.7 below).

3.3.6.2 Grading

Grading would occur on 28.42 acres of the project site. The proposed project grading would include approximately 558,043 cubic yards (cy) of cut and 539,543 cy of fill with an export of 18,500 cy to other construction sites or Hanson Aggregates. Conservatively, 564,798 cy of cut and 546,298 cy of fill with 18,500 cy of export is assumed. Grading would be accomplished with standard construction equipment, including scrapers, motor graders, water trucks, dozers, and compaction equipment (Table 3-1). No rock blasting or pile driving is expected to be necessary for project construction.

3.3.7 PROJECT DESIGN FEATURES

The following Project Design Features (PDFs) would be implemented into the design of the proposed project and included as project conditions of approval.

PDF-AQ-1: **No Fireplaces.** Prior to issuance of building permits, the project building plans shall not include any wood stoves or wood-burning or natural gas fireplaces within the residential units.

PDF-AQ-2: **No Natural Gas**. Prior to the issuance of a building permits, the City shall verify the building plans identify that no natural gas will be utilized by the project.

PDF-HAZ-1a: **Soil Remediation Requirements.** Prior to issuance of a grading permit, the grading plans shall identify the soil remediation requirements of the applicable overseeing hazardous material site clean-up program agency (i.e., Department of Environmental Health and Quality [DEHQ] or the Department of Toxic Substances Control [DTSC]) to resolve site soil contamination issues in accordance with local, state and federal regulations. This is anticipated to include (1) the removal of 4,070 cubic yards of lead-bearing soil that exceeds the Title 22 Regulatory Hazardous Waste Thresholds for lead, (2) the export of this lead-contaminated soil to an appropriately licensed facility (with receipt documentation), and (3) the removal of soils that exceeds the Soil Cap Mitigation Criteria and reuse of said soils on the site beneath a 10-foot thick soil cap.

PDF-HAZ-1b: **Soil Remediation Completion.** Prior to the issuance of the first building permit, the applicant shall provide a site closure letter issued by the overseeing hazardous material site clean-up program agency (i.e., DEHQ or DTSC) demonstrating that site soil contamination issues have been resolved in accordance with local, state and federal regulations. This would include confirmation of the completion of the above soil remediation requirements from the overseeing clean-up program agency, as well as soil vapor testing that demonstrates VOCs or methane levels below Soil Vapor Mitigation Criteria. Alternatively, if soil vapor testing demonstrates VOCs or methane levels above Soil Vapor Mitigation Criteria, building plans must include a vapor intrusion prevention system (i.e., vapor barrier) for lots with soil vapor samples reported with either VOCs or methane above Soil Vapor Mitigation Criteria prior to building permit issuance.

PDF-NOIS-1: **Interior Noise.** Prior to issuance of the building permit, the applicant/permittee shall provide the Environmental Designee with an exterior-to-interior noise analysis letter report prepared by a qualified acoustician that demonstrates interior noise levels would be consistent with Title 24 requirements of 45 dB(a) for any habitable room. Any requirements identified in the analysis to achieve the interior noise level of 45 dB(a) shall be identified on the building plans prior to issuance of the building permit.

PDF-UTIL-1: **Waste Management Plan.** The Owner/Permittee shall comply with the Waste Management Plan prepared by KLR Planning dated February 2024 and shall be enforced and implemented to the satisfaction of the Environmental Services Department.

PDF-UTIL-2: **Water Supply.** Prior to issuance of building permits, building plans shall include a potable/recycled water supply system for outdoor water use.

3.3.8 DISCRETIONARY ACTIONS

The project requires the following entitlements from the City, which would be processed concurrently unless otherwise noted.

Community Plan Amendment

The project would require a Community Plan Amendment to change the existing land use designation of Very Low Residential, with a density of 1.1 dwelling units per acre and a maximum of 45 units, to 2.7 dwelling units per acre Low Residential, with a maximum of 112 units (see Figure 3-9, Proposed Community Plan Land Use Designation). The project would also require a Community Plan Amendment to downgrade the segment of Cypress Canyon Road along the project site frontage from a two-lane collector to a two-lane sub-collector.

Rezone

A rezone is proposed to change the existing Agricultural–Residential (AR) 1-1 zone to RX-1-2 where the single-family homes are proposed, Residential–Multiple Unit (RM)-2-4 where the multifamily units are proposed, and Open Space–Residential (OR)-1-2 where open space is proposed. The RX zone allows for both attached and detached single dwelling units on smaller lots than required in the Residential–Single Unit (RS) zones. RX-1-2 would require a minimum of 3,000-square-foot lots. The RM-2-4 permits a maximum density of 1 dwelling unit for each 1,750 square feet of lot area. The OR-1-2 zone allows open space with limited private residential development. OR-1-2 allows open space with limited private residential development. The proposed rezone is shown in Figure 3-10, Proposed Zoning.

Vesting Tentative Map

Vesting Tentative Map No. 2474835 has been prepared as a part of the project in order to create new legal lots. The vesting tentative map details land development, grading, parcel configuration, and necessary infrastructure.

Site Development Permit (Process 3 for Development Within Environmentally Sensitive Lands)

A Site Development Permit would be required due to the presence of Environmentally Sensitive Lands on site in the form of sensitive biological resources (e.g., uplands, wetlands, and sensitive species) and steep slopes.

Neighborhood Development Permit

A Neighborhood Development Permit would be required in order to obtain a deviation for the following:

- Project proposes a deviation to allow a building height of up to 35 feet, where SDMC Section 131.0431, Table 131-04E, permits a maximum height of 30 feet in the RX-1-2 zone.
- Project proposes a deviation to allow a retaining wall height of up to 36 feet, where SDMC Section 142.0340(e) limits walls located outside of required yards to a maximum of 12 feet in height.
- The project proposes 16-foot-wide driveways with a 3-foot flare on each side for a total of a 22-foot-wide curb opening. Per SDMC Section 142.0560(j)(1), Table 42-05N, the minimum required and maximum allowed driveway widths (outside a Parking Impact Overlay Zone) for a detached single dwelling unit (lot widths 50 feet or less) are 12 feet and 20 feet, respectively. Additionally, per SDMC Section 142.0560(j)(1), Table 142-05M, for a detached single dwelling

unit (lot widths greater than 50 feet), the minimum required, and maximum allowed driveway widths are 12 feet and 25 feet, respectively. However, per standard drawing SDG-164, which is referred to in Land Development Code 142.0560(j)(3), the proposed 22-foot-wide curb opening would exceed the 40% maximum frontage for a curb opening on any lot less than 55 feet wide (91 of the 100 total single-family residential lots in this subdivision).

Multi-Habitat Planning Area Boundary Line Adjustment

The City's MHPA currently overlaps with a substantial portion of the project site. An MHPA BLA is proposed to remove the proposed development footprint (and associated stormwater infrastructure) from the MHPA. A portion of the proposed grading and fill activities would occur within the remaining MHPA in order to construct manufactured slope areas that would be revegetated with native species and managed in a manner consistent with MHPA standards. With approval of the BLA, the proposed development footprint would not overlap with the MHPA boundary and would only occur adjacent to the MHPA.

Right-of-Way Vacation at MHPA Addition Site

The project would include a right-of-way vacation for a portion of the existing paper right-of-way for Lakehurst Avenue located within the off-site MHPA addition area.



SOURCE: SANGIS 2017, Hunsaker and ssociates 2022

0 125 250 Feet

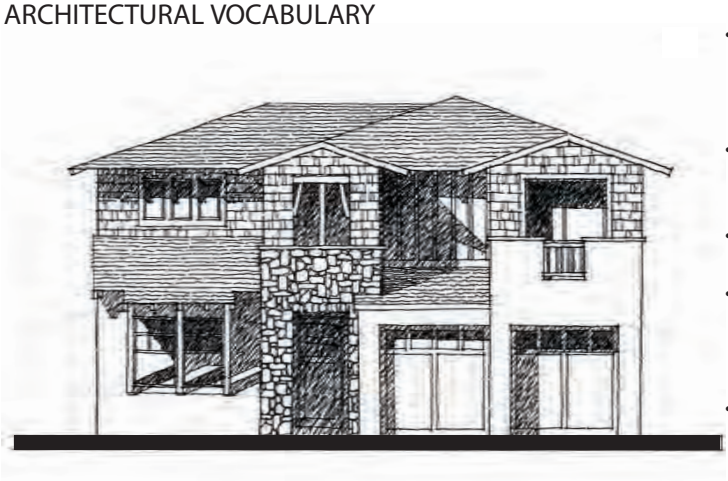
FIGURE 3-1

Site Plan

EIR for the Renzulli Estates Project, City of San Diego, California

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CALIFORNIA COASTAL: SINGLE FAMILY
ARCHITECTURAL VOCABULARY



- Combination of gable and hip roof forms with 3:12 to 6:12 roof slopes. Combination of roof slopes is acceptable.
- Clipped fascia at gables, 18" to 24" eaves with exposed rafter tails.
- Composition shingle or flat tile roof material.
- Exterior wall materials include: plaster, horizontal lap siding, shingle siding, board and batt siding, and stone or brick veneer.
- Combinations of the above materials is preferred.
- Wood posts, beams, and trellis accents.















SOURCE: Starck Architecture + Planning, Hunsaker 2023

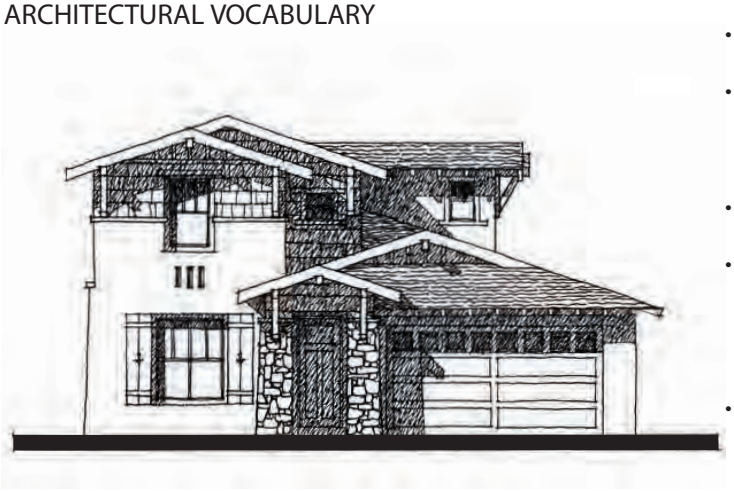
FIGURE 3-2a

Architectural Styles - California Coastal

EIR for the Renzulli Estates Project, City of San Diego, California

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CRAFTSMAN: SINGLE FAMILY
ARCHITECTURAL VOCABULARY



- Combination of gable and hip roof forms with 3:12 to 5:12 roof slopes.
- 12" to 24" fascia overhangs at gables, 24" to 30" eaves with exposed rafter tails.
- Composition shingle or flat tile roof material.
- Exterior wall materials include: plaster, horizontal lap siding, shingle siding, board and batt siding, and stone or brick veneer. The stone and brick are sometimes combined.
- Combinations of the above materials is preferred.
- Buttressed wall elements, wood posts, beams, knee brace and trellis accents.















SOURCE: Starck Architecture + Planning, Hunsaker 2023

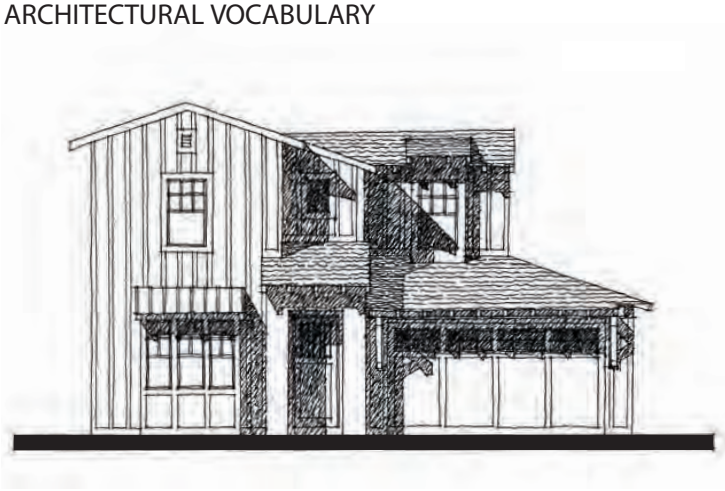
FIGURE 3-2b

Architectural Styles - Craftsman

EIR for the Renzulli Estates Project, City of San Diego, California

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FARMHOUSE: SINGLE FAMILY
ARCHITECTURAL VOCABULARY



- Combination of gable and hip roof forms with 4:12 to 8:12 roof slopes. Combination of roof slopes is acceptable.
- Clipped to 12" fascia overhangs at gables, 18" to 24" eaves with exposed rafter tails.
- Composition shingle, flat tile, or metal roof material.
- Exterior wall materials include: plaster, board and batt siding, horizontal lap siding, and stone or brick veneer.
- Combinations of the above materials is common with an emphasis on the board and batt siding.
- Trellis and bay window accents.















SOURCE: Starck Architecture + Planning, Hunsaker 2023

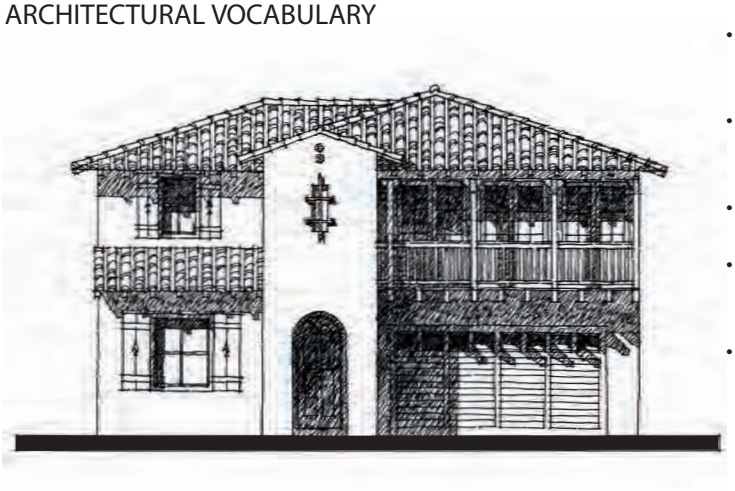
FIGURE 3-2c

Architectural Styles - Farmhouse

EIR for the Renzulli Estates Project, City of San Diego, California

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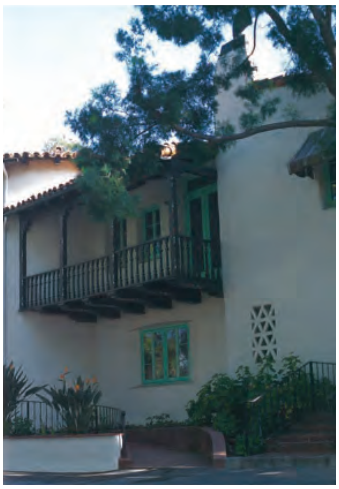
MONTEREY: SINGLE FAMILY
ARCHITECTURAL VOCABULARY



- Combination of gable and hip roof forms with 3:12 to 5:12 roof slopes.
- Rake tile fascia or 12" fascia overhangs at gables, 24" eaves with exposed rafter tails.
- "S" tile roof material.
- Exterior wall materials include: plaster, wood panel siding and stone veneer.
- This style of architecture features covered second floor balconies and/or porches. The roofs are supported by wood posts with wood or wrought iron guardrails.
- Recessed windows are common.
- Hand painted ceramic tile and wrought iron.

















SOURCE: Starck Architecture + Planning, Hunsaker 2023

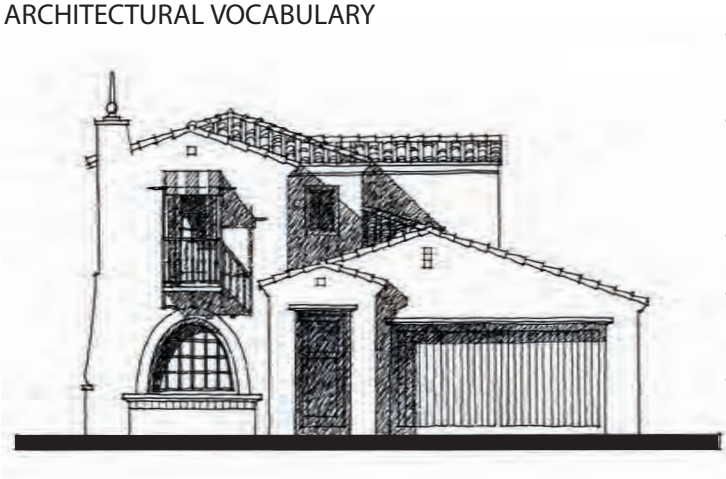
FIGURE 3-2d

Architectural Styles - Monterey

EIR for the Renzulli Estates Project, City of San Diego, California

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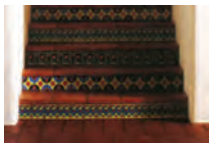
SPANISH REVIVAL: SINGLE FAMILY
ARCHITECTURAL VOCABULARY



- Combination of gable and hip roof forms with 3:12 to 5:12 roof slopes.
- Rake tile fascia at gables, under plaster eaves or 12" to 24" eaves with exposed rafter tails.
- "S" tile roof material.
- Exterior wall materials include: plaster and wood panel siding at bay windows.
- This style of architecture incorporates: finials, buttressed wall elements, wrought Iron balconies, fabric awnings, hand painted tile and wrought iron accents.
- Recessed windows are common.















SOURCE: Starck Architecture + Planning, Hunsaker 2023

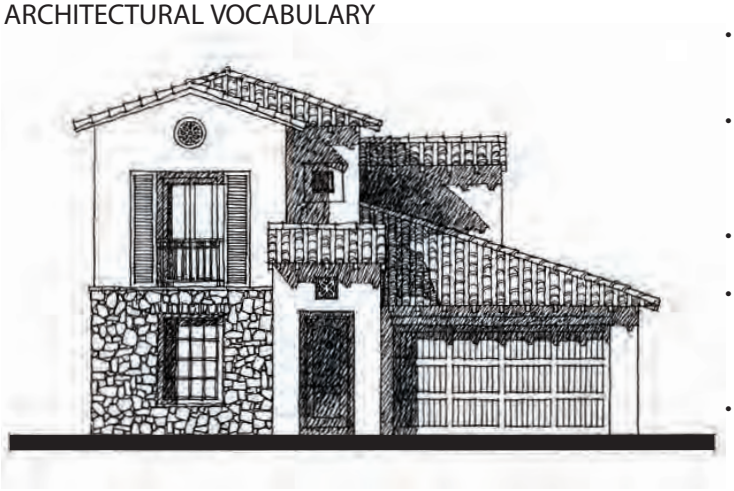
FIGURE 3-2e

Architectural Styles - Spanish Revival

EIR for the Renzulli Estates Project, City of San Diego, California

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TUSCAN: SINGLE FAMILY
ARCHITECTURAL VOCABULARY



- Combination of gable and hip roof forms with 3:12 to 5:12 roof slopes.
- Rake tile or clipped wood fascia at gables, under plaster eaves or 12" to 24" eaves with exposed rafter tails.
- "S" tile roof material.
- Exterior wall materials include: plaster and stone veneer or brick veneer. The stone and brick are sometimes combined.
- This style of architecture incorporates: buttressed wall elements, wrought Iron balconies, fabric awnings, precast grilles, and wrought iron accents.

  Recessed windows are common.
-















SOURCE: Starck Architecture + Planning, Hunsaker 2023

FIGURE 3-2f

Architectural Styles - Tuscan

EIR for the Renzulli Estates Project, City of San Diego, California

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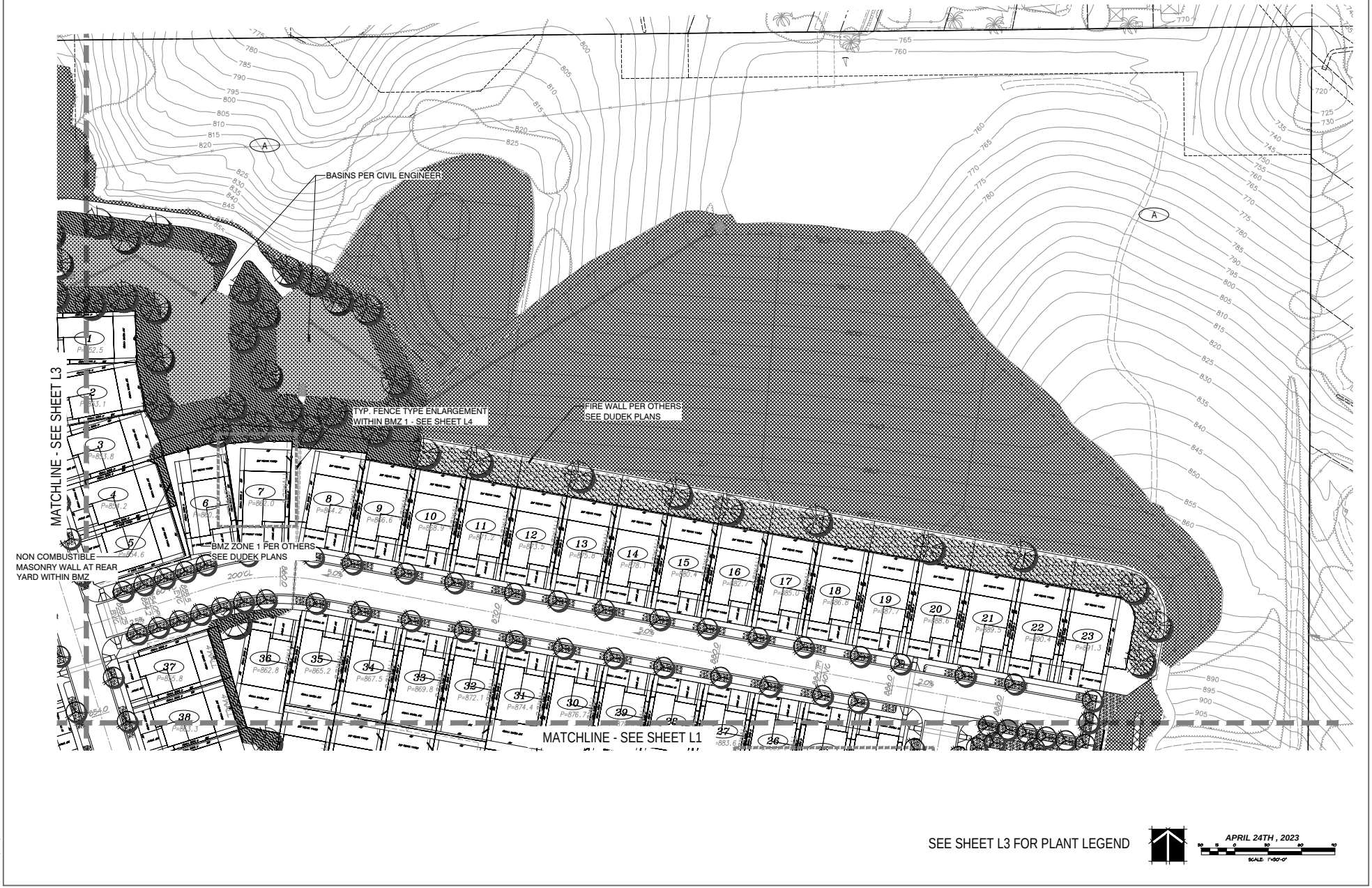
SOURCE: GMP Landscape Architecture + Planning 2023

FIGURE 3-3a

Landscape Plan

EIR for the Renzulli Estates Project, City of San Diego, California

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SOURCE: GMP Landscape Architecture + Planning 2023

FIGURE 3-3b

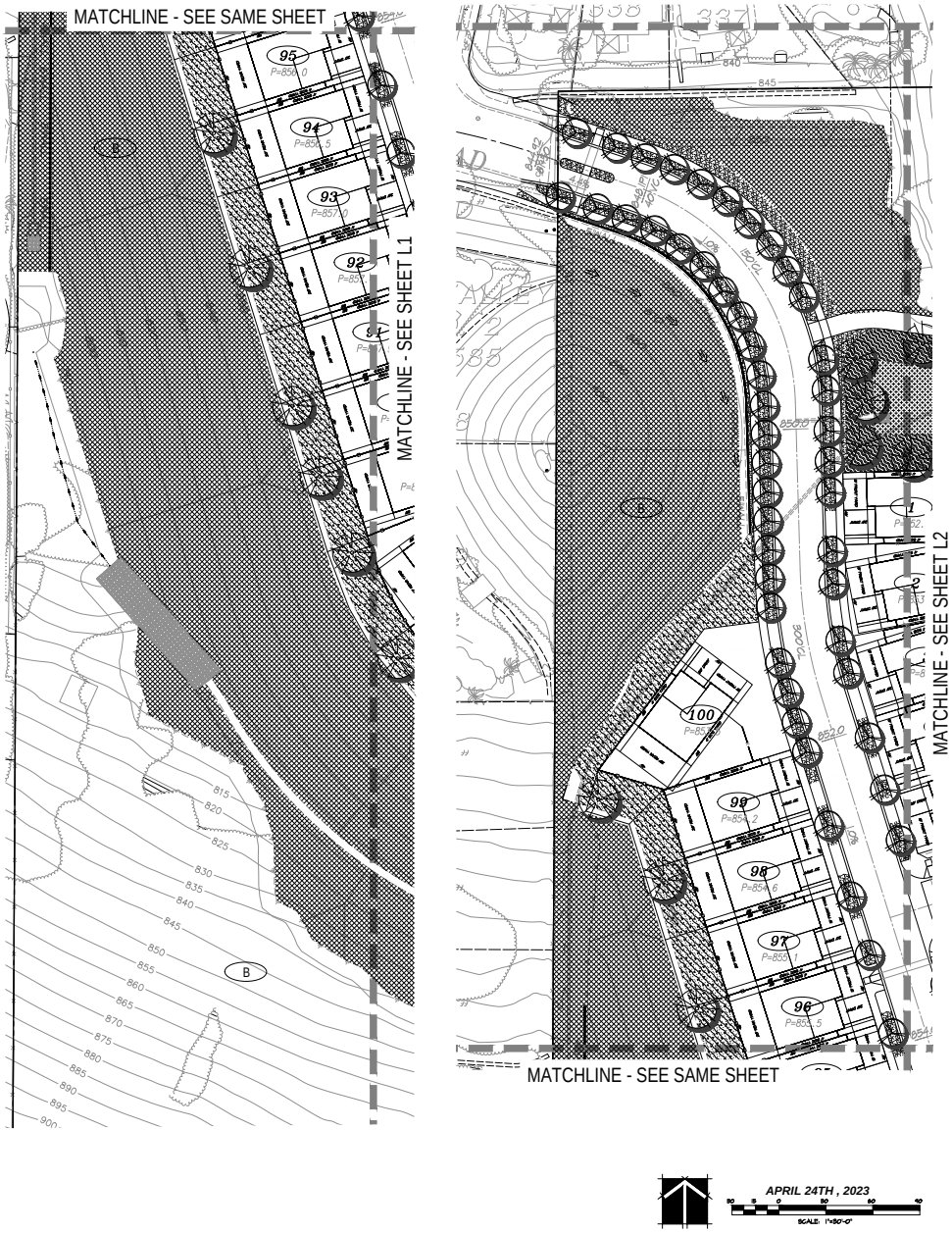
Landscape Plan

EIR for the Renzulli Estates Project, City of San Diego, California

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CONCEPT PLANT SCHEDULE

SLOPES TREES		
	HETEROMELES ARBUTIFOLIA / TOYON	24" BOX, L
	QUERCUS AGRIFOLIA / COAST LIVE OAK MULTI-TRUNK	24" BOX, L
	QUERCUS DUMOSA / COASTAL SHRUB OAK	24" BOX, L
PARKWAY TREES		
	ACACIA STENOPHYLLA / SHOESTRING ACACIA	24" BOX, L
	ARBUTUS UNEDO / STRAWBERRY TREE	24" BOX, L
	CERCIDIUM X `DESERT MUSEUM` / DESERT MUSEUM PALO VERDE	24" BOX, L
	CERCIS OCCIDENTALIS `FOREST PANSY` / WESTERN REDBUD MULTI-TRUNK	24" BOX, L
	LAURUS NOBILIS / SWEET BAY	24" BOX, L
	RHUS LANCEA / AFRICAN SUMAC	24" BOX, L
ACCENT TREES		
	CERCIS OCCIDENTALIS / WESTERN REDBUD	24" BOX, L
	OLEA EUROPAEA / OLIVE MULTI-TRUNK	24" BOX, L
	PARKINSONIA ACULEATA / MEXICAN PALO VERDE	24" BOX, L
	RHUS LANCEA / AFRICAN SUMAC	24" BOX, L
LARGE CANOPY TREES		
	ARBUTUS X 'MARINA' / MARINA STRAWBERRY TREE MULTI-TRUNK	24" BOX, L
	QUERCUS AGRIFOLIA / COAST LIVE OAK	24" BOX, L
	SCHINUS MOLLE / CALIFORNIA PEPPER TREE MULTI-TRUNK	24" BOX, L
SLOPES SHRUBS		
	ARCTOSTAPHYLOS GLANDULOSA CRASSIFOLIA / DEL MAR MANZANITA	5 GAL, L *
	ARTEMISIA CALIFORNICA / CALIFORNIA SAGEBRUSH	5 GAL, VL *
	BACCHARIS PILULARIS / COYOTE BRUSH	5 GAL, L *
	BACCHARIS SAROTHROIDES / DESERTBROOM BACCHARIS	5 GAL, L *
	CERCOCARPUS MINUTIFLORUS / MOUNTAIN MAHOGANY	5 GAL, L *
	ENCELIA CALIFORNICA / CALIFORNIA ENCELIA	5 GAL, L *
	HETEROMELES ARBUTIFOLIA / TOYON	5 GAL, L *
	MALOSMA LAURINA / LAUREL SUMAC	5 GAL, L *
	RHAMNUS CALIFORNICA / CALIFORNIA COFFEE BERRY	5 GAL, L
	RHUS INTEGRIFOLIA / LEMONADE BERRY	5 GAL, L *
	SALVIA MELLIFERA / BLACK SAGE	5 GAL, L
	XYLOCOCCUS BICOLOR / MISSION MANZANITA	5 GAL, L *
PARKWAY SHRUBS		
	AGAVE ATTENUATA / FOXTAIL AGAVE	5 GAL, L
	BOUGAINVILLEA X `SAN DIEGO RED` / BOUGAINVILLEA	5 GAL, L
	CALLISTEMON X `LITTLE JOHN` / BOTTLEBRUSH	5 GAL, L
	ENCELIA CALIFORNICA / CALIFORNIA ENCELIA	5 GAL, L
	LANTANA X `NEW GOLD` / NEW GOLD LANTANA	5 GAL, L
	SALVIA MELLIFERA / BLACK SAGE	5 GAL, L
SLOPES FUEL MANAGEMENT SHRUBS		
	ARCTOSTAPHYLOS GLANDULOSA CRASSIFOLIA / DEL MAR MANZANITA	5 GAL, L
	BACCHARIS SAROTHROIDES / DESERTBROOM BACCHARIS	5 GAL, L
	ENCELIA CALIFORNICA / CALIFORNIA ENCELIA	5 GAL, L
	HETEROMELES ARBUTIFOLIA / TOYON	5 GAL, L
	RHUS INTEGRIFOLIA / LEMONADE BERRY	5 GAL, L
	SALVIA MELLIFERA / BLACK SAGE	5 GAL, L
	YUCCA SCHIDIGERA / MOHAVE YUCCA	5 GAL, L
SLOPES GROUNDCOVER		
	BACCHARIS PILULARIS `TWIN PEAKS` / TWIN PEAKS COYOTE BRUSH	FLAT, L
	KOELERIA MACRANTHA / PRAIRIE JUNEGRASS	FLAT, L
	SISYRINCHIUM BELLUM / BLUE-EYED GRASS	FLAT, L
PARKWAY AND AMENITY GROUNDCOVER		
	BACCHARIS PILULARIS `TWIN PEAKS` / TWIN PEAKS COYOTE BRUSH	FLAT, L
	DYMONDIA MARGARETAE / SILVER CARPET DYMONDIA	FLAT, L
	SENECIO SERPENS / BLUE CHALKSTICKS	FLAT, L
BASIN GROUNDCOVER		
	BACCHARIS PILULARIS / DWARF COYOTE BRUSH	FLAT, L
	CAREX PRAEGRACILIS / CALIFORNIA FIELD SEDGE	FLAT, L
	JUNCUS BUFONIUS / COMMON TOAD RUSH	FLAT, L
	JUNCUS MEXICANUS / MEXICAN RUSH	FLAT, L
SLOPES FUEL MANAGEMENT GROUND COVER		
	BACCHARIS PILULARIS / DWARF COYOTE BRUSH	FLAT, L
	KOELERIA MACRANTHA / PRAIRIE JUNEGRASS	FLAT, L
	SISYRINCHIUM BELLUM / BLUE-EYED GRASS	FLAT, L
MANUFACTURED SLOPES - PER DUDEK PLANS		



SOURCE: GMP Landscape Architecture + Planning 2023

FIGURE 3-3c

Landscape Plan

EIR for the Renzulli Estates Project, City of San Diego, California

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SOURCE: NAIP 2020

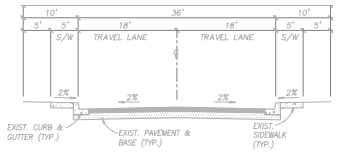
0 75 150 Feet

FIGURE 3-4

Off-Site MHPA Addition Area

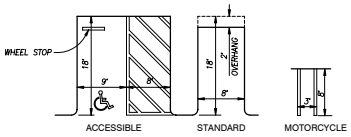
EIR for the Renzulli Estates Project, City of San Diego, California

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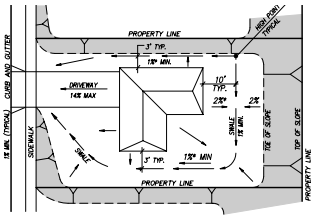
EXISTING MUNDIAL STREET

NOT TO SCALE



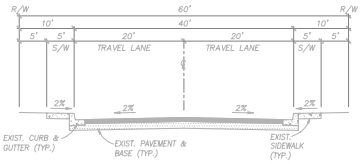
TYPICAL PARKING DETAIL

NOT TO SCALE



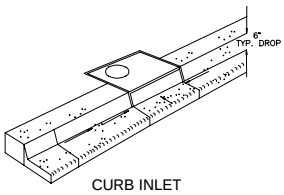
TYP. LOT DRAINAGE DETAIL

NOT TO SCALE



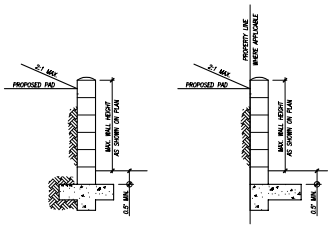
EXISTING CYPRESS CANYON ROAD

NOT TO SCALE



CURB INLET

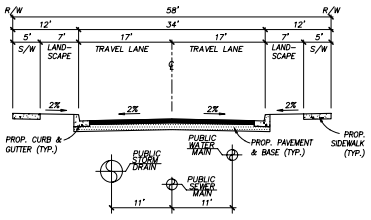
NOT TO SCALE



TYPICAL RETAINING WALL

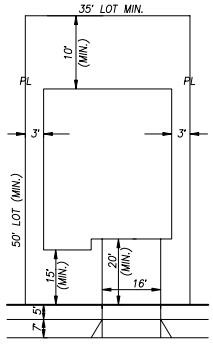
NOT TO SCALE

NOTES: 1. RETAINING WALL HEIGHT WITHIN THE FRONT YARD SETBACK SHALL NOT EXCEED 3 FEET, PURSUANT TO SDMC, SECTION 142.0340 (C).
3. RETAINING WALLS SHALL BLEND WITH THE SITE PURSUANT TO SDMC, SECTION 142.0340.



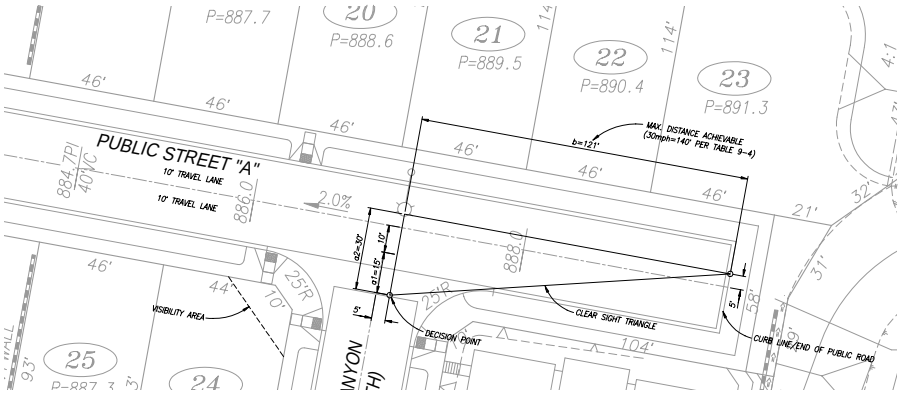
PROPOSED CYPRESS CANYON ROAD (NORTH & SOUTH) & PUBLIC STREETS 'A' & 'B'

NOT TO SCALE



TYP. MINIMUM SETBACKS

NOT TO SCALE



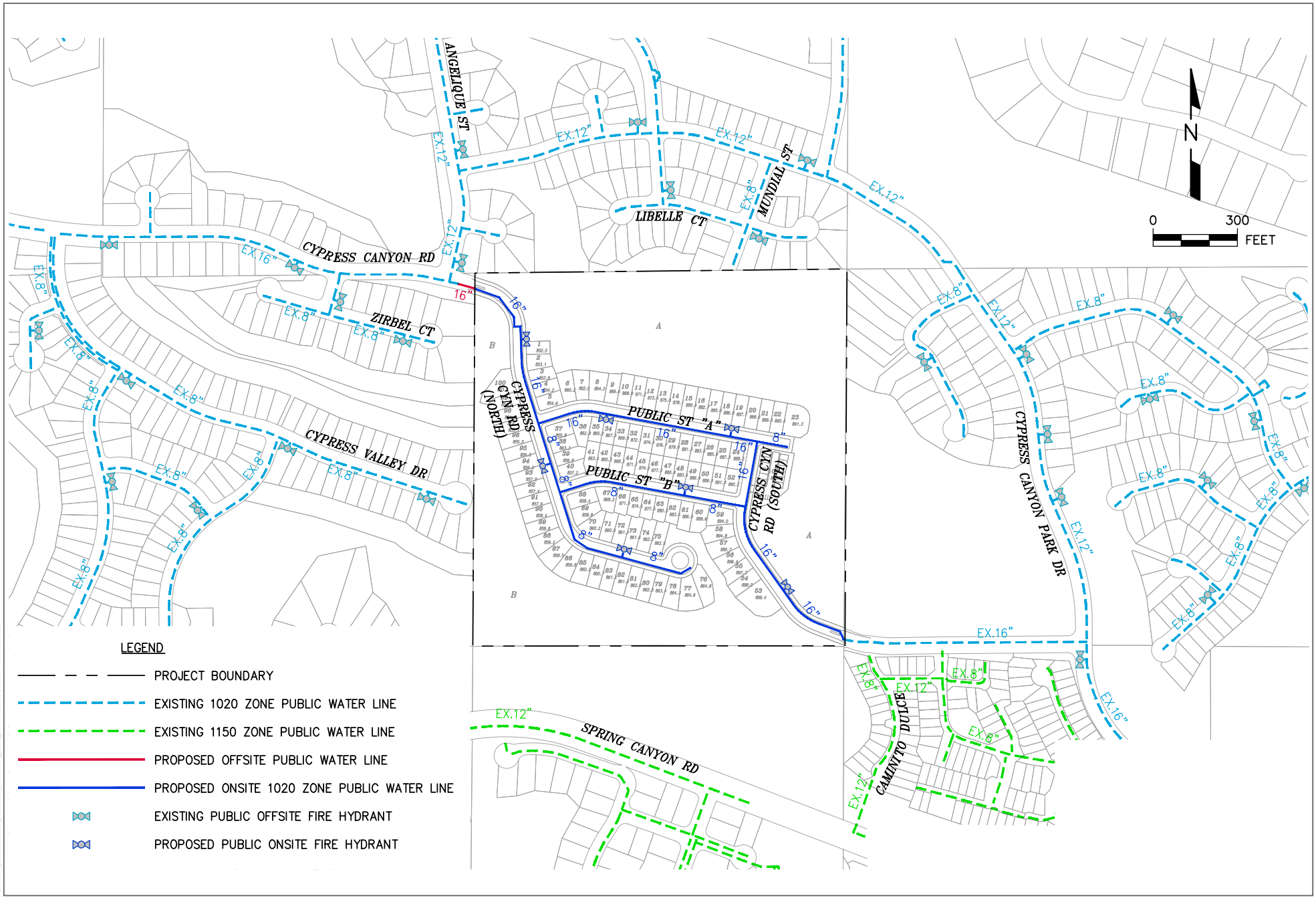
SOURCE: Hunsaker and Associates 2024

FIGURE 3-5

Proposed Street Cross Sections

EIR for the Renzulli Estates Project, City of San Diego, California

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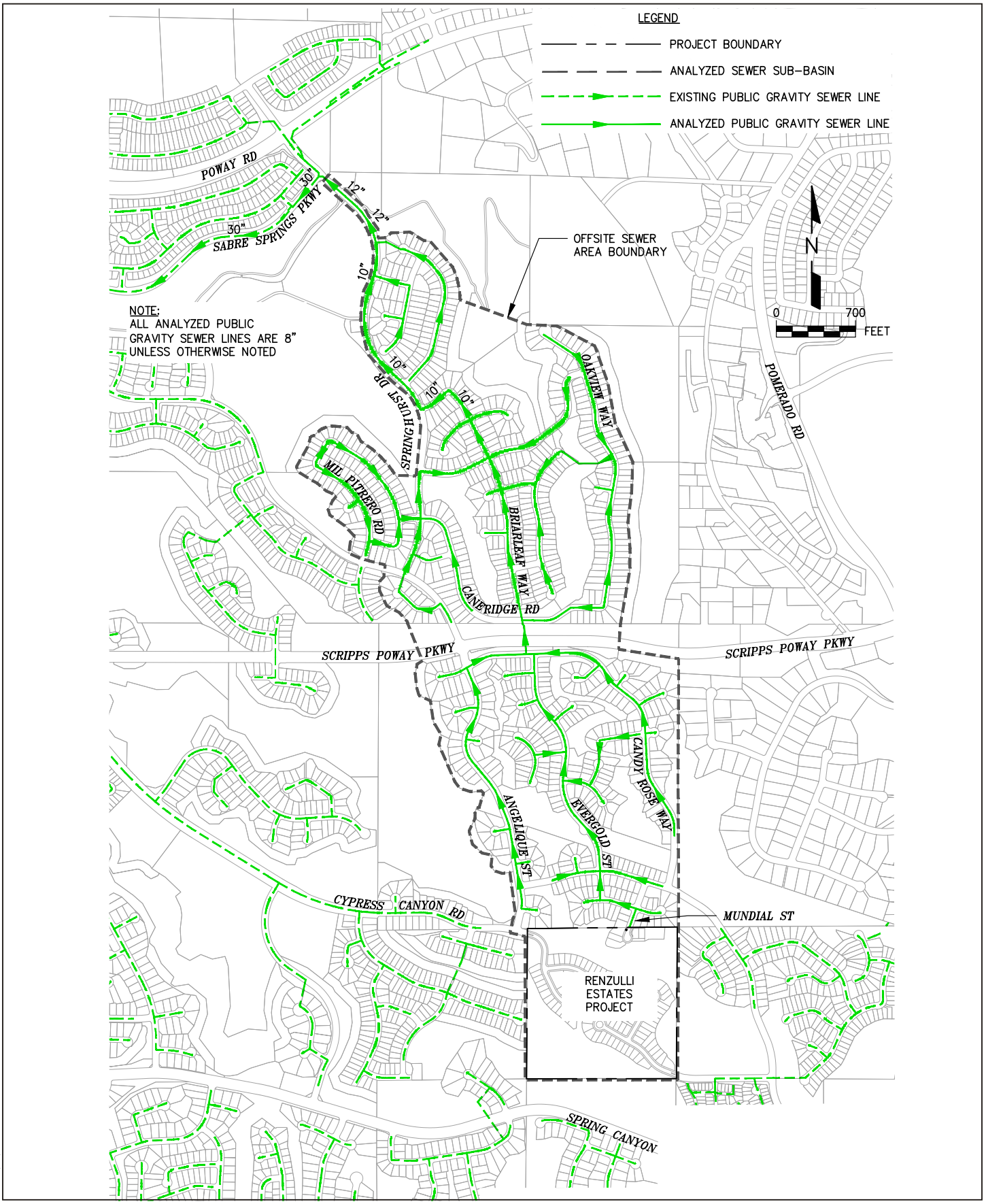
SOURCE: Dexter Wilson Engineering, Inc. 2023

FIGURE 3-6

Existing and Proposed Water Facilities

EIR for the Renzulli Estates Project, City of San Diego, California

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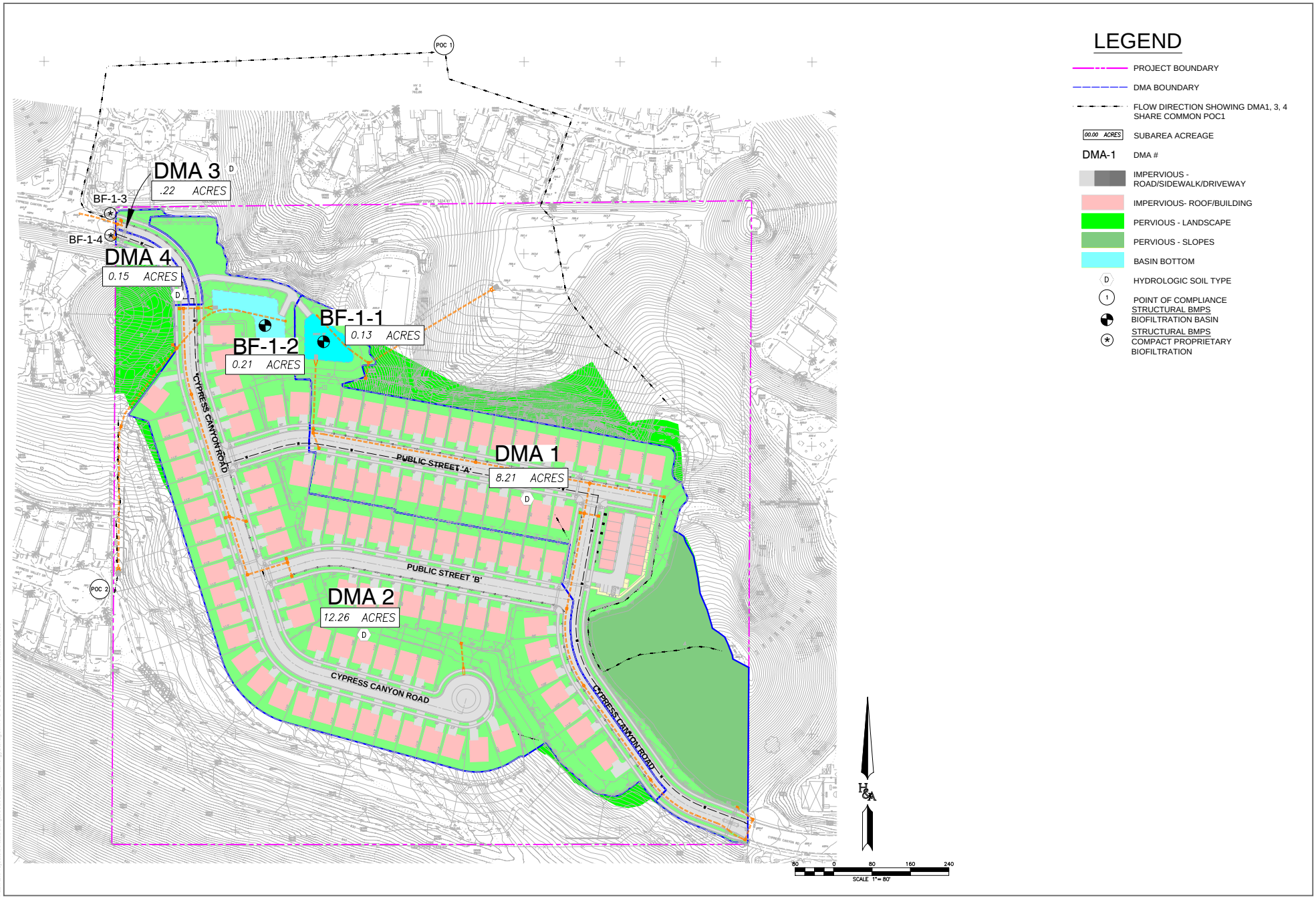
SOURCE: Dexter Wilson Engineering, Inc. 2023

FIGURE 3-7

Existing and Proposed Wastewater Facilities

EIR for the Renzulli Estates Project, City of San Diego, California

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SOURCE: Hunsaker & Associates 2020

FIGURE 3-8

Proposed Drainage Patterns

EIR for the Renzulli Estates Project, City of San Diego, California

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SOURCE: SANGIS 2017

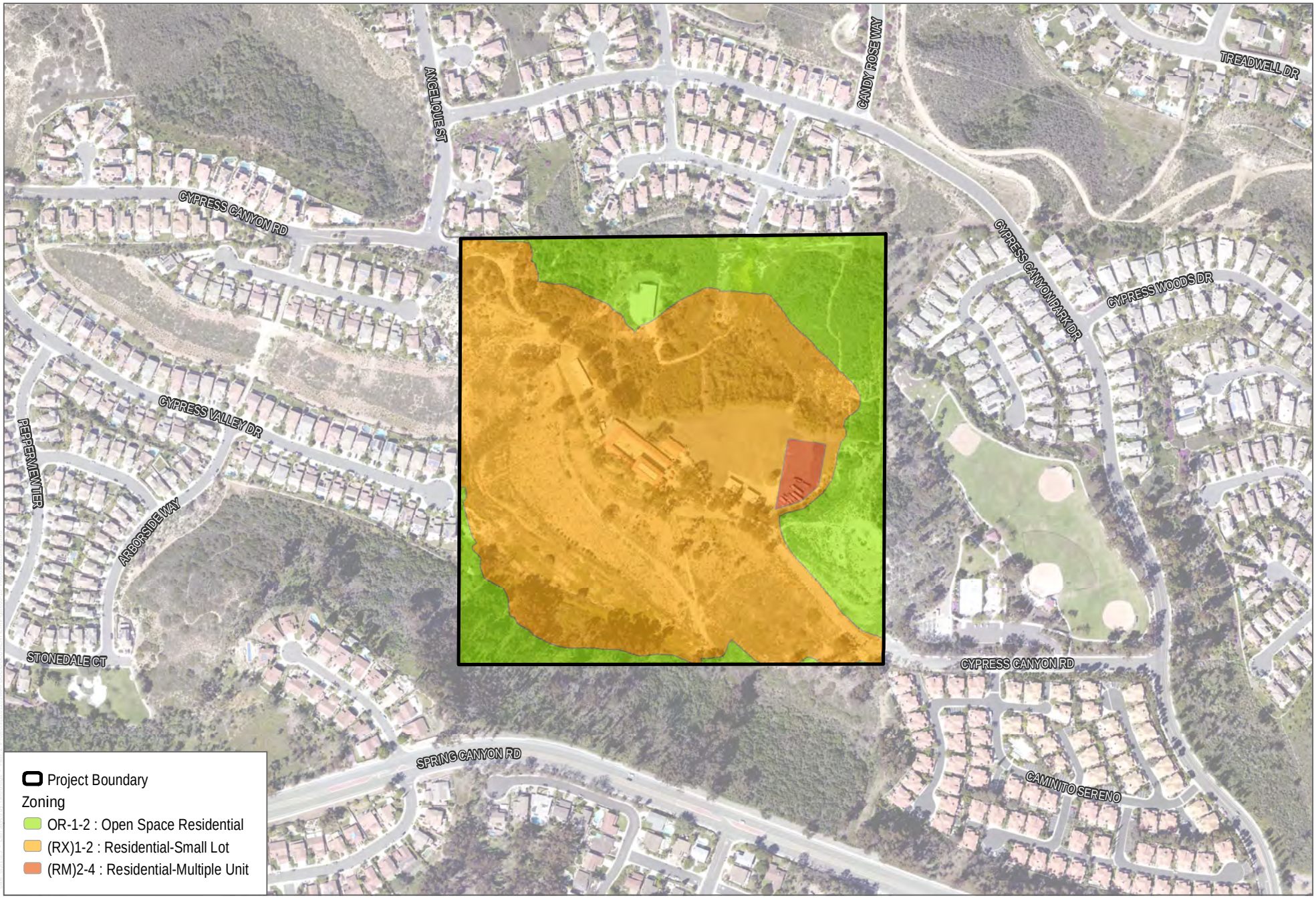
0 200 400 Feet

FIGURE 3-9

Proposed Community Plan Land Use Designation

EIR for the Renzulli Estates Project, City of San Diego, California

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SOURCE: SANGIS 2017

0 200 400 Feet

FIGURE 3-10

Proposed Zoning

EIR for the Renzulli Estates Project, City of San Diego, California

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CHAPTER 4 HISTORY OF PROJECT CHANGES

Based on review comments received from the City of San Diego (City) and Wildlife Agencies, including the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service, the Renzulli Estates Project (project) has been revised in the following manner:

Residential Development

- At the outset of the project, the applicant had anticipated payment for the in-lieu fee for affordable housing; however, the City asked for affordable housing to be built as part of the project. Acceding to this request, the applicant originally located the affordable housing component on Mundial Street. Following further consultation with the surrounding neighbors and the City, it was relocated to the center of the project site. The project currently includes 12 attached affordable apartment housing units.

Roadway Design

- Based upon input from the Community over traffic safety concerns, the initial project design proposed an opposing cul-de-sac street design with no through traffic (other than emergency/ pedestrian/bike access) on the extensions of Cypress Canyon Road into the project site. Upon consultation with the City, the project was redesigned to create a circuitous connection of Cypress Canyon Road through the project site while still achieving the traffic calming concerns of the Community.
- In addition to the meandering roadway design, the final street layout also included chokers located at the east and west entries into the project to further mitigate traffic speeds through the project site.

Consultation with Wildlife Agencies

- The previous project design required a Multi-Habitat Planning Area Boundary Line Correction and Adjustment, as well as consultation with state and federal agencies. Original project design avoided wetland area on the project site to the south and proposed grading of the existing knoll located on the eastern portion of the project site.
- Upon consultation with the agencies, the project was shifted approximately 100 yards south to provide a wider “flyway” stepping stone corridor for migrating birds. Grading of the eastern knoll was also significantly reduced at the agencies’ request.
- Upon project redesign, the project would not require a boundary line correction. The boundary line adjustment for the project was approved for concurrence by the wildlife agencies in March 2024.

Recreational Amenities

- The project design had previously included a series of hiking trails and outdoor amenities (compliant with the Multi-Habitat Planning Area regulations); however, upon discussions with the City's Parks & Recreation department and the Wildlife Agencies, they requested that the proposed trails and other recreational amenities be removed from the Multi-Habitat Planning Area on site. These facilities are not included in the final design of the project.

Utility Design

- The proposed project storm drain outfalls on the north and south side of the project were originally designed to be located within proposed Multi-Habitat Planning Area lands. Based upon input from Parks & Recreation staff, these facilities would be built with homeowner's association open space instead.

CHAPTER 5 ENVIRONMENTAL ANALYSIS

The following sections analyze the potential environmental impacts that may occur as a result of the implementation of the proposed Renzulli Estates Project (project). Each issue analysis section includes a description of existing conditions, the criteria for the determination of impact significance, an evaluation of potential project impacts, mitigation measures (if applicable), and a conclusion of significance after mitigation for impacts identified as requiring mitigation (if applicable).

The environmental issues addressed in this chapter include the following:

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

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5.1 LAND USE

This section describes the existing land use and planning conditions of the proposed Renzulli Estates Project (project) site, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if applicable.

5.1.1 EXISTING CONDITIONS

Existing Physical Conditions

The project site is located on approximately 40.56-acres within the Scripps Miramar Ranch Community Plan (Community Plan) Area (Figure 2-1, Project Location). The project site includes an existing large residence, several outbuildings, and two associated sheds. In addition, a cleared area that has been paved is in the center of the site, adjacent to the developed area. The remaining area of the site is undeveloped land.

Site Land Use and Zoning

The project site is designated as Park, Open Space, and Recreation and Residential per the City's General Plan and is zoned as Agricultural–Residential (AR) 1-1 (Figure 2-2, Existing Community Plan Land Use Designation; Figure 2-3, Existing Zoning) (City of San Diego 2015; City of San Diego 2006). Per the Community Plan, the project site has a residential land use designation of 3 to 5 dwelling units per acre (du/ac) with a maximum of 45 units, resulting in a density of 1.1 du/ac (Scripps Miramar Ranch Planning Committee et al. 2018). Permitted uses within AR zones include a wide range of agricultural uses and the development of single dwelling unit homes at a very low density. AR-1-1 requires a minimum of 10-acre lots.

Surrounding Land Uses and Setting

The area surrounding the project site consists of existing residential development (single-family) to the north and west, undeveloped open space to the south, and Cypress Canyon Park to the east. The surrounding land includes land use designations of Residential and Park, Open Space, and Recreation (City of San Diego 2015).

Further to the west, beyond the existing residential uses is Lake Miramar and the Scripps Ranch Shopping Center, a community-serving commercial center composed of a grocery store, multiple restaurants, and retail uses. The Scripps Ranch Shopping Center is designated as Commercial Employment, Retail, and Services in the City's General Plan and is zoned as Commercial–Community. The Community Plan designates the Scripps Ranch Shopping Center as Community Shopping. Lake Miramar is zoned as Open Space and has a General Plan land use designation of Park, Open Space,

and Recreation. The Community Plan identifies Lake Miramar as AR (Scripps Miramar Ranch Planning Committee et al. 2018).

North of the Scripps Miramar Ranch community and the project site is the Miramar Ranch North Community Plan. Existing land uses include residential, commercial, open space, and public facilities along Scripps Poway Parkway. The Scripps Ranch Marketplace, Scripps Canyon Park, and various single-family and multi-family dwelling units are located along Scripps Poway Parkway, to the north of the site. These areas include the following General Plan land use designations: Residential; Institutional, Public, and Semi-Public Facilities; Commercial Employment, Retail, and Services; and Park, Open Space, and Recreation.

5.1.2 REGULATORY FRAMEWORK

State

California Building Code Title 24

California Building Code Title 24, also known as the California Building Standards Code, establishes building standards applicable to all occupancies throughout the state. The code provides acoustical regulations for both exterior-to-interior sound insulation as well as sound and impact isolation between adjacent spaces of various occupied units. Title 24 regulations state that interior noise levels generated by exterior noise sources shall not exceed 45 A-weighted decibels (dBA) of community noise equivalent level (CNEL) or day–night average noise level with windows closed, in any habitable room for general residential use (State of California 2022). These regulations are applicable to the project.

Additionally, Part 11 of Title 24, known as the California Green Building Standards Code, provides guidance on mandatory and voluntary measures for environmental comfort and acoustical control. The California Green Building Standards Code recommends that classrooms have a maximum background noise level of 45 dBA equivalent sound level (L_{eq}) (State of California 2022).

Native American Coordination

Native American involvement in the development review process is addressed by several state laws. Senate Bill 18 includes detailed requirements for local agencies to consult with identified California Native American Tribes early in the planning and/or development process. The California Native American Graves Protection and Repatriation Act (2001) ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of the archaeological evaluation process in accordance with the California Environmental Quality Act (CEQA) and any applicable local regulations.

Local

San Diego Forward: The Regional Plan

The San Diego Association of Governments (SANDAG) is the federally designated Metropolitan Planning Organization for the San Diego region. SANDAG serves as a forum for public decision making on regional issues such as growth, transportation, and land use in San Diego County and consists of representatives from each of the county's local jurisdictions. SANDAG builds consensus, develops strategic plans, obtains and allocates resources, and provides information on a broad range of topics pertinent to the region's quality of life.

The Regional Comprehensive Plan, adopted in 2004 by SANDAG, laid out key principles for managing the region's growth while preserving natural resources and limiting urban sprawl. The plan covered eight policy areas, including urban form, transportation, housing, healthy environment, economic prosperity, public facilities, our borders, and social equity (SANDAG 2004).

In 2011, SANDAG approved the 2050 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). This approval marked the first time SANDAG's RTP included an SCS consistent with the Sustainable Communities and Climate Protection Act of 2008, also known as Senate Bill 375. This RTP/SCS provided a blueprint to improve mobility, preserve open space, and create communities, all with transportation choices to reduce greenhouse gas (GHG) emissions and meet specific targets set by the California Air Resources Board as required by the 2008 Sustainable Communities and Climate Protection Act (SANDAG 2011). In 2010, the California Air Resources Board established targets for each region in California governed by a metropolitan planning organization.

On October 9, 2015, the SANDAG Board of Directors adopted San Diego Forward: The Regional Plan (Regional Plan). The Regional Plan combines the two previously described existing regional planning documents: the Regional Comprehensive Plan and the RTP/SCS. The Regional Plan updates growth forecasts and is based on the most recent planning assumptions considering currently adopted land use plans, including the City's General Plan and other factors from the cities in the region and the County. SANDAG's Regional Plan would change in response to the ongoing land use planning of the City and other jurisdictions. For example, the City's General Plan, and other local General Plans of cities, may change based on General Plan amendments initiated by the jurisdiction or landowner applicants. General Plan amendments may result in increases in development densities by amending the regional category designations or zoning classifications. Accordingly, SANDAG's RTP/SCS latest forecasts of future development in the San Diego region, including location, must be coordinated closely with each jurisdiction's ongoing land use planning because that planning is not static, as recognized by the need for updates to SANDAG's RTP/SCS every 4 years. The most recent regional plan is the 2021 Regional Plan, which builds off the 2019 San Diego Forward Federal

Transportation Plan (SANDAG 2021). The 2021 Regional Plan is the long-term blueprint for the San Diego region that seeks to meet regulatory requirements, address traffic congestion, and create equal access to jobs, education, healthcare, and other community resources.

City of San Diego General Plan

The City's General Plan was adopted by the City Council on March 10, 2008, with some updates to other sections occurring later (City of San Diego 2008). The General Plan builds upon many of the goals and strategies of the former 1979 General Plan, in addition to offering new policy direction in the areas of urban form, neighborhood character, historic preservation, public facilities, recreation, conservation, mobility, housing affordability, economic prosperity, and equitable development. It recognizes and explains the critical role of the community planning program as the vehicle to tailor the City of Villages strategy for each neighborhood. It also outlines the plan amendment process and other implementation strategies, and it considers the continued growth of the City beyond the year 2021 (City of San Diego 2008). The General Plan includes a Strategic Framework that lists the 10 overall Guiding Principles, outlines the purpose of each of the different elements of the General Plan, and implementation of the General Plan (including an action plan, budgeting process, and the City of Villages strategy). The different elements of the General Plan are described in the following paragraphs.

Land Use and Community Planning Element

The Land Use and Community Planning Element was updated June 29, 2015. The purpose of this element is to guide future growth and development into a sustainable citywide development pattern while maintaining or enhancing quality of life in the City's communities. The Land Use and Community Planning Element addresses land use issues that apply to the City as a whole. The community planning program, which incorporated the various community plans adopted throughout the City, is the mechanism to refine citywide policies, designate land uses, and make additional site-specific recommendations as needed. The Land Use and Community Planning Element establishes the structure to respect the diversity of each community and includes policy direction to govern the preparation of community plans. The element also provides policy direction in areas including zoning and policy consistency, the plan amendment process, coastal planning, airport land use compatibility planning, annexation policies, balanced communities, equitable development, and environmental justice. The project site is designated Residential or Park, Open Space, Recreation in the General Plan. According to Figure LU-1 of the Land Use and Community Planning Element, the project site has low Village Propensity.

Mobility Element

The Mobility Element was updated June 29, 2015. This element strives to improve mobility in the City by providing policies that support a balanced, multimodal transportation network while minimizing environmental and neighborhood impacts. The Mobility Element contains policies that help make walking more viable for short trips, in addition to addressing various other transportation choices in a manner that strengthens the City of Villages land use visions and helps to achieve a sustainable environment.

Urban Design Element

The term "Urban Design" describes the physical features that define the character or image of a street, neighborhood, community, or the City as a whole. Urban design provides the visual and sensory relationship between people and the built and natural environment. The built environment includes buildings and streets, and the natural environment includes features such as shorelines, canyons, mesas, and parks as they shape and are incorporated into the urban framework. Citywide urban design recommendations are necessary to ensure that the built environment continues to contribute to the qualities that distinguish the City as a unique living environment.

Economic Prosperity Element

The Economic Propensity Element was updated January 19, 2023. The policies in this element are intended to improve economic prosperity by ensuring that the economy grows in ways that strengthen our industries, retain and create good jobs with self-sufficient wages, increase average income, and stimulate economic investment in our communities. A strong economy creates the wealth that allows San Diegans to support the public facilities, services, and quality of life they demand.

Public Facilities, Services, and Safety Element

The Public Facilities, Service, and Safety Element was updated January 31, 2023. This element addresses facilities and services that are publicly managed and have a direct influence on the location of land use. These include fire rescue, police, wastewater, stormwater, water infrastructure, waste management, libraries, schools, information infrastructure, disaster preparedness, and seismic safety. Public Facilities, Services, and Safety Element goals and policies are associated with providing adequate public facilities and services to serve the existing population and new growth. Applicable recommendations include requiring development proposals to fully address impacts to public facilities and services.

Recreation Element

The Recreation Element was updated August 3, 2021. The City has over 38,930 acres of park and open space lands that offer a diverse range of recreational opportunities. The Recreation Element contains goals and policies to address the challenges the City faces to preserve, protect, develop, operate, maintain, and enhance public recreation opportunities and facilities throughout the City. The purpose of the element is to help manage the increasing demand on existing/remaining usable park and recreation resources/facilities, develop open space lands and resource-based parks for population-based recreational purposes, ensure the distribution and access to parks is achieved equally citywide recognizing the unique differences among communities, and achieve livable neighborhoods and communities.

Conservation Element

The Conservation Element contains policies to guide the conservation of resources that are fundamental components of San Diego's environment, help define the City's identity, and are relied upon for continued economic prosperity. The purpose of this element is to help the City become an international model of sustainable development and conservation and to provide for the long-term conservation and sustainable management of the rich natural resources that help define the City's identity, contribute to its economy, and improve its quality of life.

Housing Element

The City of San Diego adopted the 2021–2029 Housing Element on June 16, 2020. The 2021–2029 Housing element is the sixth update, or the 6th cycle, to the City's Housing Element as it needed to be updated alongside the recent regional housing needs allocation updates given by SANDAG (City of San Diego 2020). Key goals to the Housing Element are to ensure the provision of sufficient housing for all income groups to accommodate San Diego's anticipated share of regional growth, ensure a sense of community through new development, align housing policies with climate adaptation strategies, and encourage sustainable patterns of movement.

Noise Element

The Noise Element was updated June 29, 2015. The purpose of the noise element is to protect people living and working in the City from excessive noise. The Noise Element provides goals and policies to guide compatible land uses and incorporates noise attenuation measures for new uses to protect people living and working in the City from an excessive noise environment. The City's General Plan Noise Element identifies compatible exterior noise levels for various land use types (City of San Diego 2015). The maximum allowable noise exposure varies depending on the land use. The maximum acceptable exterior noise level for residential uses and other noise-sensitive uses

(including kindergarten through 12th grade schools, libraries, hospitals, daycare facilities, hotels, motels) is 65 dBA CNEL. However, exterior noise levels are considered compatible up to 75 dBA CNEL at higher education institutions. It also establishes noise land use compatibility guidelines. Table 5.1-1 provides the noise land use compatibility guidelines, which is copied from Table NE-3 of the General Plan Noise Element.

Table 5.1-1
City of San Diego Land Use – Noise Compatibility Guidelines

Land Use Category	Exterior Noise Exposure (dBA CNEL)				
	55–60	*60--65*	*65–70*	*70–75*	*75–80*
Parks and Recreational					
Parks, Active and Passive Recreation					
Outdoor Spectator Sports, Golf Courses; Water Recreational Facilities; Indoor Recreation Facilities					
Agricultural					
Crop Raising and Farming; Community Gardens, Aquaculture, Dairies; Horticulture Nurseries and Greenhouses; Animal Raising, Maintain and Keeping; Commercial Stables					
Residential					
Single Dwelling Units; Mobile Homes		45			
Multiple Dwelling Units*		45	45*		
Institutional					
Hospitals; Nursing Facilities; Intermediate Care Facilities; Kindergarten through Grade 12; Educational Facilities; Libraries; Museums; Child Care Facilities		45			
Other Educational Facilities including Vocational/Trade Schools and Colleges and Universities		45	45		
Cemeteries					
Retail Sales					
Building Supplies/Equipment; Food, Beverages, and Groceries; Pets and Pet Supplies; Sundries, Pharmaceutical, and Convenience Sales; Wearing Apparel and Accessories			50	50	
Commercial Services					
Building Services; Business Support; Eating and Drinking; Financial Institutions; Maintenance and Repair; Personal Services; Assembly and Entertainment (includes public and religious			50	50	

Table 5.1-1
City of San Diego Land Use – Noise Compatibility Guidelines

Land Use Category	Exterior Noise Exposure (dBA CNEL)				
	55–60	*60--65*	*65–70*	*70–75*	*75–80*
assembly); Radio and Television Studios; Golf Course Support					
Visitor Accommodations		45	45	45	
Offices					
Business and Professional; Government; Medical, Dental, and Health Practitioner; Regional and Corporate Headquarters			50	50	
Vehicle and Vehicular Equipment Sales and Services Use					
Commercial or Personal Vehicle Repair and Maintenance; Commercial or Personal Vehicle Sales and Rentals; Vehicle Equipment and Supplies Sales and Rentals; Vehicle Parking					
Wholesale, Distribution, Storage Use Category					
Equipment and Materials Storage Yards; Moving and Storage Facilities; Warehouse; Wholesale Distribution					
Industrial					
Heavy Manufacturing; Light Manufacturing; Marine Industry; Trucking and Transportation Terminals; Mining and Extractive Industries					
Research and Development				50	

Table Shading Key			
	Compatible	Indoor Uses	Standard construction methods should attenuate exterior noise to an acceptable indoor noise level.
		Outdoor Uses	Activities associated with the land use may be carried out.
45, 50	Conditionally Compatible	Indoor Uses	Building structure must attenuate exterior noise to the indoor noise level indicated by the number for occupied areas.
		Outdoor Uses	Feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable.
	Incompatible	Indoor Uses	New construction should not be undertaken.
		Outdoor Uses	Severe noise interference makes outdoor activities unacceptable.

Source: City of San Diego 2015.
Notes: dBA = A-weighted decibels; CNEL = community noise equivalent level.
* For uses affected by aircraft noise, refer to General Plan Noise Element Policies NE-D.2 and NE-D.3.

The City's General Plan Noise Element also lists the following policies with respect to noise and land use compatibility.

- **NE-A.1.** Separate excessive noise-generating uses from residential and other noise-sensitive land uses with a sufficient spatial buffer of less sensitive uses.
- **NE-A.2.** Assure the appropriateness of proposed developments relative to existing and future noise levels by consulting the guidelines for noise-compatible land use (shown on Table NE-3 [reproduced in this EIR as Table 5.11-3]) to minimize the effects on noise-sensitive land uses.
- **NE-A.3.** Limit future residential and other noise-sensitive land uses in areas exposed to high levels of noise.
- **NE-A.4.** Require an acoustical study consistent with Acoustical Study Guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the "compatible" noise level thresholds as indicated on the Land Use - Noise Compatibility Guidelines [Table 5.11-3], so that noise mitigation measures can be included in the project design to meet the noise guidelines.
- **NE-A.5.** Prepare noise studies to address existing and future noise levels from noise sources that are specific to a community when updating community plans.

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. It also aims to improve the quality of the built environment, encourage appreciation for the City's history and culture, maintain the character and identity of communities, and contribute to the City's economic vitality through historic preservation.

Scripps Miramar Ranch Community Plan

The Community Plan provides the framework for development of the Scripps Miramar Ranch community in conformance with the City's General Plan. The Community Plan consists of a 4,365-acre planned community located in the northeast area of the City. It is bordered by Miramar Ranch North to the north, Interstate 15 and Mira Mesa to the west, Marine Corps Air Station Miramar to the south, and future urbanizing areas of the City to the east (Scripps Miramar Ranch Planning Committee et al. 2018).

The Community Plan sets forth goals, policies, and proposals to guide future development and purpose within the Community Plan. The Community Plan was designed to serve as a guide for the establishment of a balanced community, which would be achieved through the implementation of

the following goals, as identified in the Community Plan (Scripps Miramar Ranch Planning Committee et al. 2018):

- Preserve and enhance the valued resources of the Scripps Miramar Ranch community: hills, trees, water resources, Miramar Reservoir, Carroll Canyon and subsidiary canyons; maximize public benefit through public ownership and/access, both visual and physical, to these resources.
- Provide a harmonious physical environment within the community by maximizing preservation of existing stands of trees and foresting appropriate open space areas as development occurs.
- Maintain and enhance usable open space networks throughout the community by providing continuous open space systems which link such community elements as parks, schools, residential, commercial and industrial areas.
- Encourage development of open space buffers, which will effectively screen disparate elements of the community.
- Maintain and enhance the rural-residential characteristics of the existing Scripps Miramar Ranch, while promoting a variety of housing opportunities throughout the community.
- Encourage development of estate-type and custom lots within the planning area to complete the spectrum of housing choices in Scripps Miramar Ranch.
- Encourage development of residential facilities that cater to seniors. This will allow the aging population to remain in the Scripps Ranch community.
- Provide for educational opportunities and facilities and park and recreation services concurrent with need.
- Encourage quality educational and cultural opportunities through greater community interaction with local institutions.
- Provide an efficient transportation system for vehicular, bicycle, equestrian and pedestrian traffic within the community, with multiple access routes to the greater metropolitan area.
- Guarantee that the financial costs of further development in the planning area shall not be borne by residents of the Scripps Ranch community existing prior to the adoption of this Plan.
- Guarantee that existing public facilities (roads, parks, schools, open space, recreational facilities) shall not be adversely impacted by added population resulting from development in the planning area.
- Enhance the overall quality of the Scripps Ranch community so that the existing community benefits from, and is not degraded by, further development in the planning area.

- Preserve the existing sense of neighborhood identity, which unifies residents and promotes social interaction and civic cooperation.
- Coordinate with other planning goals within San Diego City and county so that Scripps Ranch offers a maximal positive contribution to the quality of its larger community.

In order to achieve the goals identified above, 11 community plan elements were developed and included within the Community Plan in order to serve as a guide for development. The 11 community plan elements include the Residential Element, Commercial Element, Industrial Element, Parks, Recreation and Open Space Element, School Element, Public Facilities and Services Element, Transportation Element, Community Environment Element, Social Needs Element, Design Element, and Implementation Element.

The overall land use plan for the Community Plan encompasses parcels designated for residential, commercial, industrial, recreation, open space, and support facilities.

Land Development Code Regulations

San Diego Municipal Code Chapter 13, Zones, establishes base zones and overlay zones for the land within the City. The establishment of base zones helps ensure that land uses within the City are properly located. Base zones are intended to regulate uses; minimize adverse impacts of these uses; regulated density and intensity; building size; and address the relationships between land and buildings (City of San Diego 2021a). As discussed in San Diego Municipal Code Chapter 13.2, overlay zones are applied in conjunction with base zone to provide supplemental regulations tailored to specific geographic regions in the City. As discussed in Section 5.1.1, Existing Conditions, the project site is zoned as AR-1-1.

Site Development Permit

The Land Development Code Regulations require a site development permit due to the presence of Environmentally Sensitive Lands (ESL) on the site in the form of sensitive biological resources (e.g., uplands, wetlands and, sensitive species) (see discussion below).

Environmentally Sensitive Lands

The project site contains ESL due to biologically sensitive resources and steep hillsides. Regulations for land use plans that are proposed for sites that contains ESL are regulated by the City's ESL Regulations contained in San Diego Municipal Code Section 143.0115 (Procedures and Regulations for Project-Specific Land Use Plans). The City's ESL Regulations are intended to protect ESL and ensure that development in these areas is done in a way that preserves the resources and natural character of the land.

City of San Diego Multiple Species Conservation Program Subarea Plan

The San Diego Multiple Species Conservation Program (MSCP) is a long-term regional conservation plan established to protect sensitive species and habitats in San Diego County. The regional MSCP is divided into subarea plans that are implemented separately from one another (County of San Diego 1997). The entire project site is within the City of San Diego Subarea Plan. This subarea encompasses 206,124 acres and is generally characterized by urban land use. Within the City's MSCP Subarea, a largely contiguous, habitat baseline area or Multi-Habitat Planning Area (MHPA) of approximately 60,000 acres was identified. At the end of the 50-year permit, the City's final MSCP preserve would consist of 90% or greater conserved lands from the City's MHPA. The MHPA "baseline/hard line" areas were developed by the City in cooperation with the wildlife agencies, property owners, developers, and environmental groups. The MHPA identifies biological core resource areas and corridors targeted for conservation, in which only limited development may occur (City of San Diego 1997). As discussed in Chapter 3, Project Description, of this environmental impact report (EIR), the majority of the project site currently overlaps the City's MHPA.

City of San Diego Climate Action Plan

In 2022 the City updated its Climate Action Plan (CAP) that outlines the actions that the City would undertake to achieve its proportional share of state GHG emission reductions. The CAP sets a goal to achieve net zero GHG emissions by 2035. Successful implementation of the CAP would (1) mitigate the effects of climate change with substantial impact to vulnerable communities, and (2) improve quality of life for all. The CAP includes a baseline inventory for 2019; emissions forecasts for 2020 and 2035; establishes reduction targets for 2035; and identifies federal, state and local measures to reduce emissions that, when totaled, meet or exceed the 2035 targets. The CAP also provides an implementation action and phasing for individual goals. Each of the City's CAP strategies includes goals to identify ways to reduce GHG emissions.

The CAP includes the following strategies developed to reduce Citywide GHG emissions and to achieve reduction targets by 2035 (City of San Diego 2022a):

1. Decarbonization of the Built Environment
2. Access to Clean & Renewable Energy
3. Mobility and Land Use
4. Circular Economy and Clean Communities
5. Resilient Infrastructure and Healthy Ecosystems
6. Emerging Climate Actions

5.1.3 IMPACT ANALYSIS

5.1.3.1 Issue 1: Community Plan Consistency

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?

Thresholds

According to the City's Significance Determination Thresholds (City of San Diego 2022b), an inconsistency with a plan is not in of itself a significant impact; the inconsistency would have to relate to an environmental issue (i.e., cause a direct or indirect physical change in the environment) to be considered significant under CEQA. Land use impacts may be significant if a project would be:

- Inconsistent or conflict with an adopted land use designation or intensity and result in indirect or secondary environmental impacts;
- Inconsistent or conflict with the environmental goals and/or objectives of a community or general plan; or
- Substantially incompatible with an adopted plan.

Impact Analysis

As described previously, the project site has an existing residential designation with a density of 3 to 5 du/ac and a maximum of 45 units, resulting in a density of 1.1 du/ac. In addition, the project site is designated as Park, Open Space, and Recreation and Residential per the City's General Plan and is zoned as AR-1-1 (City of San Diego 2015).

The project is concurrently undergoing a Community Plan Amendment as well as a Rezone, which would increase the intensity of use allowed on site. As discussed in Chapter 3, Project Description, the proposed Community Plan Amendment would change the existing residential designation of a 1.1 du/ac density to a density of 2.7 du/ac. Additionally, the proposed Rezone would change the existing AR-1-1 zone to Residential–Small Lot (RX) 1-2 where the single-family units would be located, Residential–Multiple Unit (RM) 2-4 where the multi-family units would be located, and Open Space Residential (OR) 1-2 where open space is proposed (see Figure 3-10, Proposed Zoning). The project would also include right-of-way vacation for a portion of the existing paper right-of-way for Lakehurst Avenue located within the off-site MHPA addition area.

Impacts associated with the increase in use intensity on the site are analyzed and addressed throughout this EIR; refer to Section 5.2, Transportation; Section 5.3, Air Quality; Section 5.7, Greenhouse Gas Emissions; Section 5.11, Noise; Section 5.14, Public Services and Facilities;

Section 5.15, Public Utilities; Section 5.17, Visual Effects/Neighborhood Character; and Chapter 6, Cumulative Impacts. The land use consistency analysis takes several factors into consideration such as whether or not the project implements a principle, goal, or policy or directly conflicts with the implementation of a principle, goal, or policy included in a planning document. Overall, as shown in Table 5.1-3 and Table 5.1-4, the project would generally not conflict with the environmental principles, goals, and policies contained within the General Plan and Community Plan.

General Plan

The project would be consistent with the General Plan's Land Use and Community Planning Element, as the project would propose a Community Plan Amendment to change the existing density of the site from 1.1 du/ac to 2.7 du/ac, with a maximum of 112 units and a Rezone from AR-1-1 zone to RX-1-2.

The project would be consistent with the General Plan's Mobility Element goals and policies, as the project would directly improve the walkability of the project site and surroundings, as a pedestrian and bicycle path network would be provided within the site that would connect the proposed residential uses to internal private amenities as well as the Cyprus Canyon Road sidewalk. Additionally, the project proposes to provide four guest parking spaces (one electric vehicle [EV] and three motorcycle spaces). In addition, the project would include one parking space with a listed cabinet, box or enclosure connected to a conduit linking the parking spaces with the electrical service, in a manner approved by the building and safety official, to allow for the future installation of EV supply equipment to provide EV charging stations at such time as it is needed for use by the residents.

The project would be consistent with the General Plan's Urban Design Element goals and policies. The project design would result in a project that is architecturally and visually similar to the existing surrounding neighborhood. The project also plans on maintaining the open space characteristics of the area by preserving open space on site. Sustainability design features to align with urban design policies include but are not limited to, developing a site within an urbanized area to reduce sprawl, clustering buildings to reduce the project footprint, infrastructure for future electrical vehicle charging stations, photovoltaic solar panels, energy efficient appliances, and use of drought tolerant landscaping and native species. Overall, the proposed development of the site would be consistent with the General Plan's Urban Design Element goals and policies.

The project would be consistent with the General Plan's Public Facilities, Services, and Safety Element goals and policies, as well as Recreation Element goals and policies. As discussed in Section 5.14, Public Services and Facilities, implementation of the project would increase the demand for public services and facilities including police and fire protection services, parks and recreation facilities, schools, and libraries. However, the project would be adequately served by existing fire

and police protection services, and there would be no need to expand or build new police or fire facilities as a result of the project. Additionally, development impact fees would also be paid to the San Diego Unified School District, and there would be no need to expand or build new school facilities as a result of the project. With regard to parks and recreation facilities, the project would increase demand for recreational areas or uses in the community. Citywide Park Development Impact Fees would be paid to the City of San Diego, and there would be no need to expand or build new park facilities as a result of the project. Additionally, this EIR has analyzed potential safety hazards associated with the project and would implement all applicable laws and regulations and impacts would be less than significant (see Sections 5.6, Geologic Conditions; 5.8, Health and Safety). This EIR has analyzed its utility and water infrastructure potential impacts and also have determined those to have a less-than-significant impact (see Sections 5.9, Hydrology; 5.14, Public Utilities; 5.17, Water Quality).

The project would be consistent with the General Plan's Conservation Element, as the project would include sustainability design features and mitigation measures to reduce the project's carbon footprint and preserve biological resources.

The project would be consistent with the General Plan's Noise Element. The project has analyzed potential noise impacts in the Noise Technical Report (Appendix J) and EIR Section 5.10 to determine if the project would result in any substantial impacts. With Mitigation Measure (MM)-NOI-1, which would require the preparation of a Construction Noise Management Plan prior to construction, impacts would be less than significant. The project would also comply with applicable existing local and state noise regulations, which are found in the City of San Diego Municipal Code Chapter 5, Article 9.5, Caltrans Transport Construction Vibration Guidance Manual, and Title 24 of the California Code of Regulations.

The project would be consistent with the General Plan's Historic Preservation Element. This EIR has analyzed potential cultural and historic impacts through its Negative Cultural Resources Letter Report (Appendix G); Section 5.9, Historical Resources; and Section 5.16, Tribal Cultural Resources, and impacts would be less than significant.

General Plan 2021–2029 Housing Element

The City's General Plan housing element contains policies that focus on ensuring the provision of sufficient housing for all income groups to accommodate San Diego's anticipated share of regional growth over the next Housing Element cycle from 2021 to 2029. The project would comply with policies that require housing accessibility to lower income residents (Policy HE-I.2) by providing 10% affordable housing units. The City's policy states new housing is to foster a sense of community through development regulations that address building orientation and architectural design

features that promote interaction and active lifestyles/commutes. The project would be consistent with this policy of fostering a sense of community by maintaining an architectural style consistent with the surrounding area.

The City's General Plan housing element also incorporates sustainability policies that align housing policies with climate adaptation policies. The project would include fully equipped EV parking spaces within the project site. Circulation within the project site would accommodate pedestrians and bicycles and would connect to the existing portion of Cypress Canyon Road to interconnect to the surrounding neighborhood in accordance with Policy HE-O.2 (Objective P).

Climate Action Plan

For project-level environmental documents, significance is determined through land use consistency and project compliance with the regulations set forth in San Diego Municipal Code Chapter 14, Article 3, Division 14 (CAP Consistency Regulations). The CAP Consistency Regulations establish measures that could be implemented on a project-by-project basis to demonstrate consistency with the 2022 CAP pursuant to CEQA Guidelines Section 15183.5(b)(1)(D). Implementation of these measures would ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving the identified GHG emissions reduction targets. Projects that are consistent with the CAP may rely on the CAP for the cumulative impacts analysis of GHG emissions. Projects that are not consistent with the CAP must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in this CAP Consistency Regulations to the extent feasible.

As detailed in Section 5.7, Greenhouse Gas Emissions, the project would not be consistent with the City's CAP because the project is inconsistent with the land use assumptions and GHG emissions assumed in the CAP for the project site. The project would implement MM-GHG-1 through MM-GHG-3 to reduce potential GHG emissions associated with the project to the extent feasible.

While the proposed mitigation measures would reduce GHG emissions, the associated reduction has not been shown to achieve emission levels below existing uses for the site (see Section 5.7, Greenhouse Gas Emissions). The project would not be consistent with the City's CAP.

Scripps Miramar Ranch Community Plan

Consistent with the Residential Element, the project would provide residential development for both single and multi-family residents. The project would comply with the rezoning procedures identified in the Community Plan and zoning regulations.

The Community Plan identifies 165 acres, or 43% of the area, should remain as open space within the plan area. The project would maintain the open space characteristics of the area by preserving 20.56 acres open space on site once restoration of graded slopes occurs. The community plan also states that density within Area E of the community plan (of which the project is located) shall not exceed 15 du per net acre. The project proposes the development of 112 units on approximately 12.67 acres of area designated for residential uses on site, resulting in a density of 9.13 units per net acre for the project. The project would improve the walkability of the project site and surrounding area with the implementation of a pedestrian and bicycle path network providing efficient transportation consistent with the community plan residential element. Additionally, impacts to public facilities and services were determined to be less than significant.

The project would not be consistent with the objectives of the parks, recreation, and open space element due to the removal of eucalyptus trees that would not be replaced through landscaping inclusive of eucalyptus trees. Project landscaping would not include the planting of eucalyptus trees as part of the landscape plan, as eucalyptus are a non-native species, have shallow roots capable of being uprooted (and can damage foundations), and are commonly understood to be fire hazards; eucalyptus trees removed during site development are not proposed to be replaced on site. While the project would be inconsistent with this plan, not planting of eucalyptus would not result in an environmental impact. Overall, the proposed development of the site would be consistent with the Community Plan's goals and policies.

Significance of Impact

Impacts associated with the increase in use intensity are discussed throughout this EIR in the sections identified above. As shown in Table 5.1-3 and Table 5.1-4, the project would not conflict with the environmental principles, goals, and policies contained within the General Plan and Community Plan. However, the project would be inconsistent with the CAP and impacts would be potentially significant.

Mitigation Measures

The project would implement mitigation measures MM-GHG-1 through MM-GHG-3.

Significance After Mitigation

The GHG mitigation measures would not reduce the proposed project GHG emissions to below a level of significance. Project impacts related to GHGs would remain significant.

5.1.3.2 Issue 2: Deviation or Variance

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?

Thresholds

According to the City's Significance Determination Thresholds (City of San Diego 2022b), land use impacts may be significant if a project would result in:

- Conflict with an adopted land use designation or intensity and indirect or secondary environmental impacts could occur.

Impact Analysis

The project's discretionary actions are listed under Section 3.3.5, Discretionary Actions. The project would request a deviation from the RX-1-2 maximum height limit of 30 feet to a maximum height limit of 35 feet; maximum retaining wall height limit of 12 feet to up to 36 feet; from curve radius requirements; and from driveway width requirements. These deviations have been evaluated as part of the EIR. Upon approval of the requested deviations for building height, wall height, curve radius, and driveway width, the project would be consistent with future land use designations and zoning. As concluded in Section 5.2, Transportation, these deviations would not result in a transportation impact.

As described in Section 5.1.1, Existing Conditions, the project site is surrounded by existing residential development, undeveloped open space, and Cypress Canyon Park. Assuming that the majority of existing residential structures surrounding the project site are built within the allowable heights of the underlying base zones, surrounding existing maximum structure heights would range from 30 feet for the existing single-family residences to 40 feet for the proposed multi-family residences. The proposed building height increase to 35 feet would not be visually significant compared to the surrounding residences considering the topographical changes and similarity in height. Based on location within the site plan, the proposed multifamily rental units would be mostly blocked from view along public roads by intervening terrain and by proposed two-story residential homes located around the perimeter of most of the development footprint. Because the increased building height allowances proposed by the project would not be overly noticeable from public

viewing locations compared to that associated with the baseline AR-1-1, and because the proposed multifamily rental units would be mostly blocked from view at public locations in the surrounding area, proposed increases in development height would not result in substantial view blockage from a public viewing area.

As the 36-foot-high soil nail wall (retaining wall) would be located between the existing, elevated ridge and the primary access driveway to the project site from Cypress Canyon Road in the eastern portion of the development footprint. Due to its location and, more specifically, the presence of tall and sloping intervening terrain to the immediate east, the proposed wall would have very limited visibility from public viewing locations. The retaining wall would also be screened by intervening terrain, proposed development, proposed landscaping and existing trees. As detailed in Section 5.17, Visual Effects/Neighborhood Character, the project with these deviations would result in less-than-significant aesthetic impacts. As deviations requested would not affect any other environmental issue or sensitive resource, it would not result in a physical impact on the environment.

Significance of Impact

Deviations requested would not result in a significant physical impact on the environment. Impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.1.3.3 Issue 3: Habitat Conservation 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?

Thresholds

According to the City's Significance Determination Thresholds (City of San Diego 2022b), impacts may be significant if a project would be:

- Inconsistent and/or conflict with adopted environmental plans for an area.

Impact Analysis

The project is within the City's MSCP Subarea Plan; more specifically, the project is located within the Northern Area of the City's MSCP Subarea Plan. The City's MHPA currently overlaps the majority of the project site. Thus, the project has proposed a MHPA boundary line adjustment (BLA) to ensure

the project would not encroach into the MHPA. The BLA would remove on-site areas from the MHPA where the project proposes construction, including infrastructure, and the expanded Zone 1 Brush Management area. The project proposes to add three discrete on-site areas to the MHPA as well as a larger off-site parcel within the North Clairemont community. Areas of restored manufactured slopes (with the exception of manufactured slopes within the Vegetated Stormwater Basin Management Area and any infrastructure associated with the project [e.g., storm water pipes, channels, and best management practices (BMPs) such as rip rap]) would remain in the MHPA following project completion . Overall, the proposed BLA would result in preservation of habitat with potential to support special-status plant and wildlife species by retaining and improving through restoration a portion of the existing MHPA on site after construction and by adding further MHPA area both on site and at the off-site MHPA BLA location at a ratio of 1.42:1. Concurrence from wildlife agencies on the BLA was received April 3, 2024; therefore, the project would not impact native habitat that could support MSCP-covered special-status wildlife species. However, sensitive wildlife species known to occur in the surrounding region, and those which have a potential to occur within the project's vicinity, include Cooper's Hawk (*Accipiter cooperii*) and Coastal California Gnatcatcher (*Polioptila californica californica*). Implementation of the project has the potential to indirectly impact these special-status birds nesting adjacent to project development area. Based on the provisions of the MSCP Implementing Agreement between the Wildlife Agencies and the City of San Diego, no additional protection is required to offset potential indirect impacts to the coastal California gnatcatchers located outside of the MHPA. Though similarly covered by the MSCP, a 300-foot avoidance buffer is required for the Cooper's hawk to comply with the MSCP conditions of coverage. Refer to Section 5.4, Biological Resources, for additional discussion.

Significance of Impact

Concurrence has been received for the proposed BLA. The project would not conflict with the City's MSCP, an adopted habitat conservation plan; natural community conservation plan; other approved local, regional, or state habitat conservation plans; or any local policies or ordinances. Therefore, impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.1.3.4 Issue 4: Division of Established Community

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

Thresholds

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

- Physically divide an established community.

Impact Analysis

Currently, the 40.56-acre project site is partially developed with one residence and associated outbuildings and sheds, as well as a paved area located in the center or the site. The project would not construct structures that have the potential to physically divide an established community (such as large roadways, extension of physical barriers). The project would extend the existing Cypress Canyon Road through the project site to connect with the northwest segment of Cypress Canyon Road. The proposed extension of Cypress Canyon Road through the project site would increase connections between the proposed project and the surrounding community.

Significance of Impact

The project would not divide an established community; therefore, no impact would occur.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.1.3.5 Issue 5: Airport Land Use Compatibility Plan

Issue 5: Would the project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?

Thresholds

According to the City's Significance Determination Thresholds (City of San Diego 2022b), land use impacts may be significant if a project would:

- Include incompatible uses as defined in an airport land use plan or inconsistency with an airport's land use compatibility plan as adopted by the Airport Land Use Commission to the extent that the inconsistency is based on valid data.

Impact Analysis

The closest airport to the project site is the Marine Corps Air Station Miramar Airport, located approximately 4 miles to the southwest of the project site. The project is not located within the Airport Influence Area; thus, the project would not conflict with an existing ALUCP. In addition, the project does not propose uses that would create electrical hazards to aircrafts or propose the use of neon lights that could be mistaken for airport lighting or interfere with night vision goggles used by military pilots. The project would not include large water features or propose uses that would attract wildlife such as birds that would interfere with aircraft operations. Additionally, the project would not meet Federal Aviation Association notification criteria as defined in the Code of Federal Regulations Title 14, Part 77.

The project site is not otherwise located in areas designated for airspace protection, Federal Aviation Administration height notification, or safety zones of an existing ALUCP. Therefore, the project would not result in land uses that are incompatible with an ALUCP.

Significance of Impact

The project would not result in land uses that are incompatible with an ALUCP, and no impacts would occur.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.1.3.6 Issue 6: Noise Element Standards

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

Thresholds

The City CEQA Significance Determination Thresholds (City of San Diego 2022b), discuss noise/land use compatibility. It is also noted that information presented in the City CEQA Significance Determination Thresholds has been superseded by CEQA Guidelines updates and updates to the City General Plan. Specifically, updates to CEQA have occurred that specify CEQA analysis is to address the project impact on the environment and not the converse. In addition, the currently adopted 2008 General Plan and 2015 Noise Element information is utilized for this analysis herein. The City General Plan Noise Element was updated in June 2015 and supersedes Table K-2 included in the CEQA Significance Determination Thresholds from the previous City of San Diego Progress

Guide and General Plan (Transportation Element). As shown in Table 5.1-3, the City considers outdoor noise levels up to:

- 65 dBA CNEL to be conditionally compatible for single dwelling units, provided that interior noise levels of 45 dBA CNEL can be maintained;
- 70 dBA CNEL to be conditionally compatible for multiple dwelling units, provided that interior noise levels of 45 dBA CNEL can be maintained.

The project would have a significant impact on land use as related to noise if the project would:

- Result in a perceptible change in noise level and the noise level that exceeds the exterior noise land use compatibility guidelines.

Impact Analysis

Ambient noise levels in the project area are largely influenced by vehicular traffic and currently exceed 65 dBA CNEL. As discussed in Section 5.11, Noise, the project would meet compatibility requirements since the ambient noise levels exceed the thresholds and the project results in a less than 3 decibel (dB) increase.

Current CEQA Guidelines do not require an assessment of noise impacts on a project from the environment. Nevertheless, this analysis is provided for land use compatibility analysis considering the project includes a rezone and the California Building Code requires that interior background noise levels not exceed a CNEL of 45 dB within habitable rooms. Hence, the following predictive analysis of traffic noise exposure at the exteriors of occupied residences and outdoor living areas is provided below.

The Federal Highway Administration Traffic Noise Modeling was also used to predict the Future + Project scenario traffic noise levels at multiple on-site exterior areas, as listed in Table 5.1-2. Modeled receptor locations include representative positions for the exteriors of multiple lots of the closest to surrounding roadways.

Table 5.1-2
On-Site Roadway Traffic Noise Modeling Results

Modeled Receiver (Lot)	Predicted Traffic Noise Exposure at Modeled Receiver (dBA CNEL)
M11	46.9
M23	49.3
M65	46.9
M97	38.7

Notes: dBA = A-weighted decibel; CNEL = Community Noise Equivalent Level.

Typically, with the windows open, building shells provide approximately 15 dB (i.e., an average of 12 dB to 18 dB [OPR 2017]) of exterior-to-interior noise reduction; while with windows closed residential construction generally provides a minimum of 25 dB attenuation (FHWA 2011). Therefore, rooms exposed to an exterior CNEL not greater than 60 dB would result in an interior background CNEL of 45 dB or less, even with open fenestration. In other words, the arithmetic difference of an exterior noise level less than 60 dBA CNEL and an exposed building façade that provides 15 dB of sound insulation results in an interior background sound level less than 45 dBA CNEL. Table 5.1-2 shows that no residential lot would be exposed to a CNEL of above 60 dB and thus, interior background noise levels would not exceed a CNEL of 45 dB within habitable rooms. Thus, the project would be in compliance with Title 24 interior noise requirements and would meet the compatible use threshold for residential uses.

Significance of Impact

Table 5.1-2 shows that no residential lot would be exposed to a CNEL of above 60 dB and thus, interior background noise levels would not exceed a CNEL of 45 dB within habitable rooms. Thus, the project would be in compliance with Title 24 interior noise requirements and would meet the compatible use threshold for residential uses as identified in Table 5.1-3, City of San Diego Land Use – Noise Compatibility Guidelines. Therefore, impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation is required.

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
Land Use and Community Planning Element			
Policy LU-D.1	Require a general plan and community plan amendment for proposals that involve: a change in community-plan-adopted land use or density/intensity range; a change in the adopted community plan development phasing schedule; or a change in plan policies, maps, or diagrams. (Note: state law mandates that General Plan and community plan amendments are not to be required for projects utilizing state mandated housing density bonuses.)	The project would include a Community Plan Amendment to change the existing residential designation from a density of 1.1 du/ac to a density of 2.7 du/ac. The Community Plan Amendment would be implemented upon approval of the project and would revise the maximum allowed units per the Community Plan at the project site from 45 units to a maximum of 112 units. Therefore, with implementation of the proposed Community Plan Amendment, the project would be consistent with this policy.	The project would be consistent with this policy.
Policy LU-D.3	Evaluate all plan amendment requests through the plan amendment initiation process and present the proposal to the planning commission or city council for consideration.	The project would require a Community Plan Amendment, which would be reviewed by the planning commission and city council pursuant to the requirements of the General Plan, Community Plan, and San Diego Municipal Code.	The project would be consistent with this policy.
Policy LU-D.12	Evaluate specific issues that were identified through the initiation process as well as any additional community-specific amendment evaluation factors.	Through the CEQA process, specific issues identified during the initiation process were reviewed and analyzed for potential environmental impacts. See Chapters 5, 6, and 7 of this EIR. The City Long Range Planning Staff has evaluated the appropriate land use designation and zoning for the site. Therefore, the project would be consistent with this policy.	The project would be consistent with this policy.
Policy LU-D.13	Address the standard plan amendment issues prior to the planning commission decision at a public hearing related to level and diversity of community support; appropriate size and boundary for the amendment site; provision of additional benefit to the community; implementation of major general plan and community plan goals, especially as related to the vision, values, and City of Villages strategy; and provision of public facilities.	Refer to the analyses in Land Use Policy LU-D.3 and LU-D.12. The project objectives, which are included in Chapter 3, Project Description, outline benefits to the community including the addition of affordable housing units and redevelopment of an underutilized site. The proposed project, along with the Community Plan Amendment, would implement those objectives, which would result in a benefit to the community. The Community Plan Amendment would provide additional benefit to the community and would implement major Community Plan goals by adding affordable housing and adding to the housing stock as needed per the RHNA. The project's consistency with the Community Plan is discussed in table 5.1-3. The project would have less-than-significant impacts to public facilities, as detailed in Section 5.14, Public Services and Facilities..	The project would be consistent with this policy.
F. Consistency Goals	Zoning concurrent with community plan updates and amendments to ensure consistency with community plan land use designations. Zones or development regulations to better implement updated community plans.	Refer to the analyses in Land Use Policy LU-D.3. Proposed zoning designations include the following: RX-1-2, RM-2-4, and OR-1-2, which would be implemented concurrent and consistent with the proposed amendments to the Community Plan. The proposed Rezone would implement uses and residential densities within the allowable uses of the existing General Plan designation and proposed Community Plan designations.	The project would be consistent with this goal.
Policy LU-F.1	Apply existing or new Land Development Code zone packages or other regulations as needed to better	As discussed in Section 5.1, Land Use and Planning, and herein throughout Table 5.1-3 and Table 5.1-4 the project would comply with the City's General	The project would be consistent with this policy.

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	implement the policy recommendations of the General Plan, land use designations of the community plans, other goals and policies of the community plans, and community-specific policies and recommendations.	Plan and the Community Plan. The project would also comply with the City's Land Development Code, as discussed in Section 5.1, Land Use and Planning.	
Policy LU-F.2	Review public and private projects to ensure that they do not adversely affect the general plan and community plans. Evaluate whether proposed projects implement specified land use, density/intensity, design guidelines, and other general plan and community plan policies, including open space preservation, community identity, mobility, and the timing, phasing, and provision of public facilities.	The project would be consistent with the City's General Plan. Upon adoption of the proposed Community Plan Amendment, the project would be generally consistent with both the City's General Plan and the Community Plan, including policies regarding open space preservation, community identity, mobility, and the timing, phasing, and provision of public facilities.	The project would be consistent with this policy.
H. Balanced Communities and Equitable Development Goals	Ensure diverse and balanced neighborhoods and communities with housing available for households of all income levels. Community and neighborhood-specific strategies and implementation measures to achieve equitable development.	The project would include 100 single-family homes and 12 multi-family affordable income rental units. As such, the project would ensure a diverse and balanced neighborhood, as well as equitable development, by providing housing that would provide affordable housing on a quality development site that contains homes of varying sizes, open space, and recreational activities.	The project would be consistent with this goal.
Policy LU-H.1	Promote development of balanced communities that take into account community-wide involvement, participation, and needs. a. Plan village development with the involvement of a broad range of neighborhood, business, and recognized community planning groups and consideration of the needs of individual neighborhoods, available resources, and willing partners. b. Invest strategically in public infrastructure and offer development incentives that are consistent with the neighborhood's vision. c. Recognize the important role that schools play in neighborhood life and look for opportunities to form closer partnerships among local schools, residents, neighborhood groups, and the City with the goal of improving public education. d. Ensure that neighborhood development and redevelopment addresses the needs of older people, particularly those disadvantaged by age, disability, or poverty.	The project would include 100 single-family homes and 12 multi-family affordable income rental units on approximately 40.56 acres. The project would include additional community benefits such as the extension of the existing Cypress Canyon Road through the project site, which would promote connectivity to surrounding residential development and Cypress Canyon Park to the east of the project, as well as open space areas at the northern and southern portion of the project site. The proposed 12 multi-family affordable income rental units shall be designated as affordable to meet the City of San Diego's Inclusionary Affordable Housing Regulations. As such, the project would ensure a diverse and balanced neighborhood, as well as equitable development, by providing housing that would provide affordable housing on a quality development site that contains homes of varying sizes, open space, and recreational activities. Any proposed new infrastructure needed to serve the project would be connected to existing infrastructure and construction would occur within the boundaries of the site. Thus, all environmental impacts associated with infrastructure improvements have been accounted for in this Draft EIR, and no additional environmental impacts associated with infrastructure improvements would occur. The project would also provide multimodal transit options including a connection of Cypress Canyon Road between Angelique Street and Cypress Canyon Park Drive, which would provide vehicular access and bicycle	The project would be consistent with this policy.

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	e. Provide affordable housing opportunities within the community to help offset the displacement of the existing population. f. Provide a full range of senior housing from active adult to convalescent care in an environment conducive to the specific needs of the senior population.	connectivity consistent with the proposed Class III Bike Route outlined in the Community Plan. Policy LU-H.1.a, LU-H.1.c, and LU-H.1.f would not be applicable to the project. The project is not a village development, does not propose a school, and senior housing policies would be undertaken by community planning on a broader scale rather than single developments projects such as the project.	
Policy LU-H.2	Provide affordable housing throughout the City so that no single area experiences a disproportionate concentration.	Refer to the analysis in Land Use Goal H.	The project would be consistent with this policy.
Policy LU-H.3	Provide a variety of housing types and sizes with varying levels of affordability in residential and village developments.	Refer to the analysis in Land Use Goal H. Proposed housing types include 100 two-story single-family residences, with six different architectural styles. The proposed multi-family affordable housing units would be located within two 40-foot three-story building.	The project would be consistent with this policy.
Policy LU-I.14	As part of community plan updates or amendments that involve land use or intensity changes, evaluate public health risks associated with identified sources of hazardous substances and toxic air emissions (see also Conservation Element, Section F). Create adequate distance separation based on documents such as those recommended by CARB and site-specific analysis, between sensitive receptor land use designations and potential identified sources of hazardous substances such as freeways; industrial operations; or areas such as warehouses, train depots, port facilities, etc.	The project's potential impacts associated with hazards and hazardous materials are discussed in Section 5.8, Health and Safety. As discussed therein, demolition of on-site structures would be completed in accordance with regulations through PDF-HAZ-1 and would not result in a significant potential to release asbestos and lead particles to the environment. Impacts would be less than significant. Additionally, as discussed, in Section 5.3, Air Quality, the project would result in less-than-significant impacts with MM-AQ-1. In addition, as discussed in Section 5.3, Air Quality, a Health Risk Assessment was performed for the project and impacts would be less than significant (see Appendix C, Air Quality Technical Report).	The project would be consistent with this policy.
		Mobility Element	
A. Walkable Community Goals	A safe and comfortable pedestrian environment. A complete, functional, and interconnected pedestrian network, that is accessible to pedestrians of all abilities. Greater walkability achieved through pedestrian-friendly street, site and building design.	The project site currently does not allow for pedestrian use or connectivity. The project would directly improve the walkability of the project site and surroundings by providing sidewalks with canopy and shade-producing trees connected to the surrounding neighborhoods and open space areas. An extended segment of Cypress Canyon Road would circulate throughout the project site to provide mobility for pedestrians and bicyclists. The project's internal street network would accommodate automobiles, bicycles, and pedestrians.	The project would be consistent with these goals.
Policy ME-A.1	Design and operate sidewalks, streets, and intersections to emphasize pedestrian safety and comfort through a variety of street design and traffic management solutions, including but not limited to those described in the Pedestrian Improvements Toolbox, Table ME-1.	Refer to the analysis for Mobility Element Goal A. Table ME-1 of the General Plan includes examples of pedestrian facilities that can be implemented to support pedestrian circulation. As discussed in Section 5.2, Transportation, to ensure pedestrian safety, the project would install high visibility crosswalks and pedestrian countdown timers. The high visibility crosswalks would be located at all the Pomerado Road and Spring Canyon Road intersection legs. Pedestrian countdown timers would be installed at all	The project would be consistent with this policy.

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		intersections with pedestrian crossings. Pedestrian lighting would be provided to increase on-site safety, visibility, and wayfinding throughout the site during nighttime hours. Additionally, the project would install two chokers along Cypress Canyons Road, as traffic-calming measures.	
Policy ME-A.2	Design and implement safe pedestrian routes. a. Collaborate with appropriate community groups and other interested private and public sector groups or individuals to design and implement safe pedestrian routes to schools, transit, and other highly frequented destinations. Implement needed improvements and programs such as wider and noncontiguous sidewalks, more visible pedestrian crossings, traffic enforcement, traffic calming, street and pedestrian lighting, pedestrian trails, and educating children on traffic and bicycle safety. b. Promote "Walking School Bus" efforts where parents or other responsible adults share the responsibility of escorting children to and from school by foot or bicycle. c. When new schools are planned, work with school districts and affected communities to locate schools so that the number of students who can walk to school safely is maximized. d. Implement CPTED measures to reduce the threat and incidence of crime in the pedestrian environment (see also Urban Design Element, Policy UD-A.17). e. Ensure that there are adequate law enforcement, code enforcement, and litter and graffiti control to maintain safe and attractive neighborhoods. f. Provide adequate levels of lighting for pedestrian safety and comfort.	Refer to the analysis for Policy ME-A.1.Policy ME-A.2(a), ME-A.2(b), ME-A.2(c), would not be applicable to the project as no schools are existing or planned nearby. These policies would be undertaken by community planning on a broader scale rather than single developments projects such as the project. Public spaces would also be clearly marked and would only be open for public use during designated hours. Security lighting would be provided within the parking areas. In addition, lighting would be provided throughout the project, especially along the pedestrian walkways.	The project would be consistent with this policy.
Policy ME-A.4	Make sidewalks and street crossings accessible to pedestrians of all abilities. a. Meet or exceed all federal and state requirements. b. Provide special attention to the needs of children, the elderly, and people with disabilities. c. Maintain pedestrian facilities to be free of damage or trip hazards.	Refer to the analysis for Mobility Element Goal A. The City of San Diego Standard Drawing SDG-164 would require 12-foot-wide driveways with a 3-foot flare on each side. However, the project proposes 16-foot-wide driveways with a 3-foot flare on each side. While the project would increase the width of driveways within the project site, the requested deviation increasing the width of the driveways would not result in the increased frequency of driveways or the inability of pedestrians to use the proposed	The project would be consistent with this policy.

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		sidewalks. All proposed sidewalks and street crossings would be constructed in accordance with all federal, state, and local safety requirements.	
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.	Refer to the analysis for Mobility Element Goal A. The City of San Diego Standard Drawing SDG-164 would require 12-foot-wide driveways with a 3-foot flare on each side. However, the project proposes 16-foot-wide driveways with a 3-foot flare on each side. While the project would increase the width of driveways within the project site, the requested deviation increasing the width of the driveways would not result in the increased frequency of driveways or the inability of pedestrians to use the proposed sidewalks. The project would design driveways in consideration of pedestrian use and safety, consistent with all federal, state, and local safety requirements.	The project would be consistent with this policy.
Policy ME-A.6	Work toward achieving a complete, functional and interconnected pedestrian network. a. Ensure that pedestrian facilities such as sidewalks, trails, bridges, pedestrian oriented and street lighting, ramps, stairways and other facilities are implemented as needed to support pedestrian circulation. Additional examples of pedestrian facilities are provided in the Pedestrian Improvements Toolbox, Table ME-1. 1. Close gaps in the sidewalk network. 2. Provide convenient pedestrian connections between land uses, including shortcuts where possible. 3. Design grading plans to provide convenient and accessible pedestrian connections from new development to adjacent uses and streets. b. Link sidewalks, pedestrian paths, and multipurpose trails into a continuous region-wide network where possible. c. Provide and maintain trash and recycling receptacles and restrooms available to the public where needed. d. Address pedestrian needs as an integral component of community and public facilities financing plan updates and amendments, other planning studies and programs, and the development project review process. e. Routinely accommodate pedestrian facilities and amenities into private and public plans and projects.	Refer to the analysis for Mobility Element Goal A and Policy ME-A.1.	The project would be consistent with this policy.
Policy ME-A.7	Improve walkability through the pedestrian-oriented design of public and private projects in areas where higher levels of pedestrian activity are present or desired.	Refer to the analysis for *Policy ME-A.1* The proposed landscaping would include native and low-water species and would incorporate natural materials such as boulders, cobbles, gravels, and	The project would be consistent with this policy.

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	a. Enhance streets and other public rights-of-way with amenities such as street trees, benches, plazas, public art, or other measures including, but not limited to, those described in the Pedestrian Improvement Toolbox, Table ME-1 (see also Urban Design Element, Policy UD-A.10) b. Design site plans and structures with pedestrian-oriented features (see also Urban Design, Policies UD-A.6, UD-B.4, and UD-C.6). c. Encourage the use of non-contiguous sidewalk design where appropriate to help separate pedestrians from auto traffic. In some areas, contiguous sidewalks with trees planted in grates adjacent to the street may be a preferable design. d. Enhance alleys as secure pathways to provide additional pedestrian connections. e. Implement traffic-calming measures to improve walkability in accordance with Policy ME-C.5. f. When existing sidewalks are repaired or replaced, take care to retain sidewalk stamps and imprints that are indicators of the age of a particular neighborhood or contribute to the historic character of a neighborhood.	aggregates to enhance visual interest. Landscaping would include installation of public right-of-way parkway plantings. In addition, landscaping would be utilized to obscure any undesirable views, such as automobiles, storage, utility areas, etc.). The project would not result in repair or replacement of sidewalks. Therefore, Policy ME-A.7(f) would not apply to the project. The project proposes to install two chokers along Cypress Canyons Road, as traffic-calming measures. One choker would be located east of the Cypress Canyon Road and Angelique Street intersection, while the other would be located east of the Cypress Canyon Road and the proposed Public Street "B" intersection.	
E. Transportation Demand Management	Reduced single-occupant vehicle traffic on congested streets and freeways. Improved performance and efficiency of the street and freeway system by means other than roadway widening or construction. Expanded travel options and improved personal mobility.	An extended segment of Cypress Canyon Road would circulate throughout the project site to provide mobility for pedestrians and bicyclists. The project's internal street network would accommodate automobiles, bicycles, and pedestrians.	The project would be consistent with this policy.
Policy ME-E.1	Support and implement TDM strategies including, but not limited to, alternative modes of transportation, alternative work schedules, and telework.	Refer to the analysis for Mobility Element Goal A. The project would also provide multimodal transit options including a connection of Cypress Canyon Road between Angelique Street and Cypress Canyon Park Drive, which would provide vehicular access and bicycle connectivity consistent with the proposed Class III Bike Route outlined in the Community Plan.	The project would be consistent with this policy.
Policy ME-E.3	Emphasize the movement of people rather than vehicles.	Refer to the analysis for Mobility Element Goal A and Policy ME-E.1. The proposed connection of Cypress Canyon Road between Angelique Street and Cypress Canyon Park Drive would provide pedestrian connectivity and bicycle connectivity consistent with the proposed Class III Bike Route outlined in the Community Plan.	The project would be consistent with this policy.

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
Policy ME-E.6.	Require new development to have site designs and on-site amenities that support alternative modes of transportation. Emphasize pedestrian and bicycle-friendly design, accessibility to transit, and provision of amenities, that are supportive and conductive to implementing TDM strategies such as car sharing vehicles and parking spaces, bike lockers, preferred rideshare parking, showers and lockers, on-site food service, and childcare, where appropriate.	Refer to the analysis for *Policy ME-E.1*. In addition, parking would be provided on site. The project proposes to provide garage parking with two or three spaces for each single-family dwelling unit and a parking garage with 24 parking spaces for the multi-family dwelling units (two spaces per unit). The project proposes to provide four guest parking spaces (one EV and three motorcycle spaces. In addition, the project would include one parking space with a listed cabinet, box, or enclosure connected to a conduit linking the parking spaces with the electrical service, in a manner approved by the building and safety official, to allow for the future installation of EV supply equipment to provide EV charging stations at such time as it is needed for use by the residents.	The project would be consistent with this policy.
F. Bicycling	A safe and comprehensive local and regional bikeway network.	This is not a project-specific goal, but the project would contribute to the bikeway network by connecting the current termini of Cypress Canyon Road.	The project would be consistent with this goal.
Policy ME-F.4	Provide safe, convenient, and adequate short- and long-term bicycle parking facilities and other bicycle amenities for employment, retail, multifamily housing, schools and colleges, and transit facility uses. a. Continue to require bicycle parking in commercial and multiple unit residential zones. b. Provide bicycle facilities and amenities to help reduce the number of vehicle trips.	Refer to the analysis for Policy ME-E.1. Bicycle racks are not required for dwelling units with a garage accessible only by the residents of the dwelling unit.	The project would be consistent with this policy.
G. Parking Management Goal	New development with adequate parking through the application of innovative citywide parking regulations.	The project would provide adequate parking as required by San Diego Municipal Code Table 142-05C.	The project would be consistent with this goal.
Policy ME-G.1	Provide and manage parking so that it is reasonably available when and where it is needed. a. Where parking deficiencies exist, prepare parking master plans to inventory existing parking (public and private), identify appropriate solutions, and plan needed improvements.	Refer to the analysis for Parking Management Goal G.	The project would be consistent with this policy.
Policy ME-G.2.	Implement innovative and up-to-date parking regulations that address the vehicular and bicycle parking needs generated by development. a. Strive to reduce the amount of land devoted to parking through measures such as parking structures, shared parking, mixed-use developments, and managed public parking, while still providing appropriate levels of parking.	The project would provide adequate parking as required by San Diego Municipal Code Table 142-05C. Each proposed single- and multi-family units would be provided with a private garage. The project proposes to provide garage parking with two or three spaces for each single-family dwelling unit and a parking garage with 24 parking spaces for the multi-family dwelling units (two spaces per unit). The project proposes to provide four guest parking spaces (one EV and three motorcycle spaces).	The project would be consistent with this policy.

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		Urban Design Element	
A. General Urban Design Goals	A built environment that respects San Diego's natural environment and climate. An improved quality of life through safe and secure neighborhoods and public places. Utilization of landscape as an important aesthetic and unifying element throughout the City.	The project would develop a community of 112 residential units. The project would provide open space areas, pedestrian pathways, and landscaping features throughout the project site. Landscaping would include drought-tolerant native vegetation and low-water-use plants. The landscape scheme would include a range of tree types and forms, including vertical columnar trees, small accent trees, and large shade-producing canopy trees. Gateways into the community would be clearly marked. Building designs would establish a pattern and hierarchy of building massing and forms to help reduce the visual bulk of the development and would incorporate smaller-scale architectural elements, such as bay windows, decorative panels, color accents, offsets, and framed openings to reduce visual bulk and scale.	The project would be consistent with this goal.
Policy UD-A.1	Preserve and protect natural landforms and features. a. Protect the integrity of community plan designated open spaces. b. Continue to implement the MSCP to conserve San Diego's natural environment and create a linked open space system. Preserve and enhance remaining naturally occurring features such as wetlands, riparian zones, canyons, and ridge lines.	The project site is designated as Residential and Open Space in the Community Plan. The project would develop portions of the project site that is currently open space, however approximately 20.56 acres would remain in open space. As discussed in Section 5.4, Biological Resources, the majority of the project site is located within the City's MHPA. A proposed MHPA BLA would ensure that the project would not encroach into the MHPA. The project would comply with the City's MSCP Land Use Adjacency Guidelines.	The project would be consistent with this policy.
Policy UD-A.2	Use open space and landscape to define and link communities. a. Link villages, public attractions, canyons, open space, and other destinations together by connecting them with trail systems, bikeways, landscaped boulevards, formalized parks, and/or natural open space, as appropriate. b. Preserve and encourage preservation of physical connectivity and access to open space. c. Recognize that sometimes, open spaces prevent the continuation of transportation corridors and inhibit mobility between communities. Where conflicts exist between mobility and open space goals, site-specific solutions may be addressed in community plans.	The proposed sidewalks would circulate throughout the project site to provide mobility and recreational opportunities for pedestrians. The sidewalks would connect to existing sidewalks within adjacent residential streets to maximize access and connectivity. Specifically, the proposed connection of Cypress Canyon Road between Angelique Street and Cypress Canyon Park Drive would provide pedestrian connectivity and bicycle connectivity consistent with the proposed Class III Bike Route outlined in the Community Plan. Lastly, the project would result in increased mobility through the extension of Cypress Canyon Road while maintaining open space on site, resulting in implementing a site-specific solution to the site's unique characteristics.	The project would be consistent with this policy.
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.	Refer to the analysis in Urban Design Policy UD-A.2. The project site contains various hillside area. However, the design of the project would focus development on the center of the site, which contains a	The project would be consistent with this policy.

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	a. Integrate development on hillside parcels with the natural environment to preserve and enhance views and protect areas of unique topography. b. Minimize grading to maintain the natural topography, while contouring any landform alterations to blend into the natural terrain. c. Utilize variable lot sizes, clustered housing, stepped-back facades, split-level units, or other alternatives to slab foundations to minimize the amount of grading. d. Consider terraced homes, stepped down with the slope for better integration with the topography to minimize grading in sensitive slope areas. e. Utilize a clustered development pattern, single-story structures or single-story roof elements, or roofs sloped toward the open space system or natural features, to ensure that the visibility of new developments from natural features and open space areas are minimized. f. Provide increased setbacks from canyon rims or open space areas to ensure that the visibility of new development is minimized. g. Screen development adjacent to natural features as appropriate so that development does not appear visually intrusive or interfere with the experience within the open space system. The provision of enhanced landscaping adjacent to natural features could be used to soften the appearance of or buffer development from the natural features. h. Use building and landscape materials that blend with and do not create visual or other conflicts with the natural environment in instances where new buildings abut natural areas. This guideline must be balanced with a need to clear natural vegetation for fire protection to ensure public safety in some areas. i. Ensure that the visibility of new development from natural features and open space areas is minimized to preserve the landforms and ridgelines that provide a natural backdrop to the open space systems. For example, development should not be visible from	relatively flat area already. While the project site includes steep hillsides that would require alteration to accommodate the residential development footprint, the proposed slopes on site would be designed to integrate into existing contours of adjacent hilly terrain (so as to be perceived as a visual continuation of existing landforms) to the extent practicable. The project would enhance the natural environment through implementation of manufactured slopes within the proposed grading areas (see Figure 3-1, Site Plan). Project development would incorporate building and landscape materials to blend with the surrounding environment. The proposed single-family and multi-family developments would implement one of the six architectural styles that blends with surrounding development. Limited views of the project would be available from public vantage points. As such, the proposed development would not substantially block public views or obstruct available views of a public resource. Additionally, as discussed in Section 5.19, Wildfire, portions of the project site are located within the Very High Fire Hazard Severity Zone. However, the project would include modification measures, including brush management zones, in compliance with the BMZ requirements and as determined by the San Diego Fire Rescue Department (see Section 5.19, Wildfire). The project would also use drought-tolerant, naturalized landscaping, which would include fire-resistive plants. The project would be required to design, construct, and maintain structures, private drives, and facilities in compliance with applicable local, regional, state, and federal requirements related to fire safety, emergency access, and evacuation plans, as well as building materials, setbacks, water supply, hydrants, fire-flow, and defensible space requirements for development in fire hazard areas. As a result, the project was determined to have less-than-significant impacts from wildfire hazards.	

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	canyon trails at the point the trail is located nearest to proposed development. Lines-of-sight from trails or the open space system could be used to determine compliance with this policy. j. Design and site buildings to permit visual and physical access to the natural features from the public right-of-way. k. Encourage location of entrances and windows in development adjacent to open space to overlook the natural features. l. Protect views from public roadways and parklands to natural canyons, resource areas, and scenic vistas. m. Preserve views and view corridors along and/or into waterfront areas from the public right-of-way by decreasing the heights of buildings as they approach the shoreline, where possible. n. Provide public pedestrian, bicycle, and equestrian access paths to scenic viewpoints, parklands, and were consistent with resource protection, in natural resource open space areas. o. Provide special consideration to the sensitive environmental design of roadways that traverse natural open space systems to ensure an integrated aesthetic design that respects open space resources. This could include the use of alternative materials such as "quiet pavement" in noise sensitive locations and bridge or roadway designs that respect the natural environment. p. Design structures to be ignition and fire-resistant in fire prone areas or at-risk areas as appropriate. Incorporate fire-resistant exterior building materials and architectural design features to minimize the risk of structure damage or loss due to wildfires.		
Policy UD-A.4	Use sustainable building methods in accordance with the sustainable development policies in the Conservation Element.	The proposed development would comply with Title 24 and CALGreen, as part of project conditions. To meet these requirements, the proposed residential buildings would include rooftop photovoltaic solar panels, energy-efficient lighting and appliances, cool roofs, energy-efficient windows, and other design features that significantly conserve energy. In addition, the project would result in clustering of residential buildings and minimization of the project's	The project would be consistent with this policy.

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		development footprint, and use of drought tolerant landscaping to reduce water demand.	
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 proximate 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. g. Design rear elevations of buildings to be as well-detailed and visually interesting as the front elevation, if they will be visible from a public right-of-way or accessible public place or street. h. Acknowledge the positive aspects of nearby existing buildings by incorporating compatible features in new developments. i. Maximize natural ventilation, sunlight, and views.	As discussed in Section 3.3.1, Residential Development, architectural styles for the proposed development could consist of California Coastal, Craftsman, Farmhouse, Monterey, Spanish Revival, and/or Tuscan style. The architectural style of the proposed development would be consistent throughout residential units and would include visual interest, such as varied rooflines and facades. The proposed colors shall consist of light to medium dark earth tones. The site design, as indicated in the project goals, includes clustering development to minimize changes to the natural topography and environmental resources.	The project would be consistent with this policy.

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	j. Provide convenient, safe, well-marked, and attractive pedestrian connections from the public street to building entrances. k. Design roofs to be visually appealing when visible from public vantage points and public rights-of-way.		
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.	Refer to the analyses for Policy UD-A.5. The project's landscaping would incorporate color from plant foliage, bark, or flowers to create a visually appealing landscape environment. The project would be designed to have buildings related to existing adjacent uses. One of the project objectives is to provide a cohesive design that is compatible in use, scale, and character with the surroundings (see Section 3.2, Project Objectives). The surrounding development consists of residential (single-family) and open space areas. There would be deviations in building height, as detailed in Section 3.3.5, Discretionary Actions. Should the project be approved, approval of these building height deviations would also be approved.	The project would be consistent with this policy.
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. a. Maximize the planting of new trees, street trees, and other plants for their shading, air quality, and livability benefits (See also Urban Forestry section of Conservation Element, Policies CE-A.11, CE-A.12, and Section J). b. Encourage water conservation through the use of drought-tolerant landscape. c. Use landscape to support stormwater 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 (See also Conservation Element, Section J). f. Design landscape bordering the pedestrian network with new elements, such as a new plant form or material, at a	The landscape scheme would include a range of tree types, including slopes trees, parkway trees, and accent trees. In addition, the landscaped areas would contain slopes shrubs and parkway shrubs. The proposed landscaping would ultimately be designed in accordance with the City of San Diego Municipal Code Section 142.0402, the City of San Diego Land Development Manual, Landscape Standards, and other applicable city and regional standards for landscape installation and maintenance. Landscaping would be a carefully planned aspect of the project and would be consistent with landscaping aesthetics and patterns throughout the City, as the landscaping plan for the project would comply with all relevant local regulations regarding landscaping. Drought-tolerant, naturalized landscaping would be used throughout the project site. A Stormwater Quality Management Plan has also been developed for the project and includes BMPs to maintain natural drainage features and minimize potential impacts to storm drain facilities. Additionally, as discussed in the Drainage Study prepared for the project, Appendix I1, implementation of the project would not adversely affect existing drainage patterns. Furthermore, as discussed in Section 5.6, Geologic Conditions, short-term erosion and sedimentation impacts would be addressed through conformance with applicable elements of the City storm water program and related NPDES standards. Additionally, the project would implement an approved Stormwater	The project would be consistent with this policy.

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	scale and at 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. h. Shade paved areas, especially parking lots. j. Use landscaped walkways to direct people to proper entrances and away from private areas. k. Reduce barriers to views or light by selecting appropriate tree types, pruning thick hedges, and large overhanging tree canopies. l. Utilize landscape adjacent to natural features to soften the visual appearance of a development and provide a natural buffer between the development and open space areas	Pollution Prevention Plan and related plans and BMPs, including appropriate measure to address erosion and sedimentation. As such, potential erosion and sedimentation impacts from implementation of the project would be less than significant.	
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.	As discussed in Section 5.17, Visual Effects/Neighborhood Character, the project would introduce new sources of lighting on the project site. Lighting at the project site would include street lighting for safety and security purposes. All lighting proposed would be constructed in compliance with the standards contained in the City's Outdoor Lighting Regulations (San Diego Municipal Code Section 142.0740), which requires that all outdoor lighting fixtures shall be installed in a manner that minimizes negative impacts from light pollution including light trespass, glare, and urban sky glow in order to preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination. To minimize glare and contrast, lighting would be directed downward and would only be provided to the level necessary for the safety of pedestrians and vehicles. All outdoor lighting would be shielded to prevent spillover and glare to adjacent land uses. Section 5.17, Visual Effects/Neighborhood Character, determined that the project would result in less-than-significant impacts from light and glare.	The project would be consistent with this policy.
Policy UD-A.14.	Provide comprehensive project sign plans to effectively utilize sign area. a. Design signs as a means to communicate a unified theme and identity for the project. b. Include pedestrian-oriented signs to acquaint users with various aspects of a development. Place signs to direct vehicular and pedestrian circulation. c. Post signs to provide directions and rules of conduct where appropriate behavior control is necessary.	. All signage would be consistent with Chapter 14 Article 2 Division 12 of the San Diego Municipal Code and the Scripps Miramar Ranch signage design criteria, where appropriate. Project signage would be designed to be harmonious with the project design and direct pedestrian and vehicular circulation.	The project would be consistent with this policy.

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	d. Design signs to minimize negative visual impacts.		
Policy UD-A.17.	Incorporate CPTED measures, as necessary, to reduce incidences of fear and crime, and design safer environments. a. Design projects to encourage visible space and "eyes on the street" security that would serve as a means to discourage and deter crime through the location of physical features, activities, and people to maximize visibility. b. Define clear boundaries between public, semi-public/private, and private spaces. c. Promote regulations, programs, and practices that result in the proper maintenance of the measures employed for CPTED surveillance, access control, and territoriality. d. Consider pedestrian scale lighting and indirect techniques to provide adequate security but not glare and flood-light conditions.	As described in the analysis for General Plan Policy UD-A.13, the project would incorporate safety lighting throughout the project site for security purposes. Public spaces would also be clearly marked and would only be open for public use during designated hours. Pedestrian lighting would be provided to increase on-site safety, visibility, and wayfinding throughout the site during nighttime hours. Security lighting would be provided within the parking areas. In addition, lighting would be provided throughout the project, especially along the pedestrian walkways.	The project would be consistent with this policy.
B. Distinctive Neighborhoods and Residential Design Goals	A city of distinctive neighborhoods. Development that protects and improves upon the desirable features of San Diego's neighborhoods. Architectural design that contributes to the creation and preservation of neighborhood character and vitality. Innovative design for a variety of housing types to meet the needs of the population. Infill housing, roadways and new construction that are sensitive to the character and quality of existing neighborhoods. Pedestrian connections linking residential areas, commercial areas, parks, and open spaces.	The project would develop the proposed residential units with a unique character and sense of place. The architectural style of the proposed development would be consistent throughout residential units and could consist of California Coastal, Craftsman, Farmhouse, Monterey, Spanish Revival, and/or Tuscan style. This consistent style would create a sense of community and harmonious appearance. Entrances to the neighborhood would be clearly marked and accentuated with distinct landscape features. Residential units would be oriented and relate directly to internal streets and open spaces to generally create an attractive presence. The project would include 112 residential units on approximately 40.56 acres. The proposed residential units would include 100 single-family homes and 12 multi-family affordable income rental units, resulting in a variety of housing types. Although the site is not located in an infill area, existing residential development is generally located on all sides of the project site. Building designs would establish a pattern and hierarchy of building massing and forms to help reduce the visual bulk of the development and would incorporate smaller-scale architectural elements, such as bay windows, decorative panels, color accents, offsets, and framed openings to add visual interest and reduce the scale and mass of buildings.	The project would be consistent with these goals.

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		The project would include sidewalks that connect to existing pedestrian circulation to promote interconnectivity to nearby neighborhoods and open space areas. The project would also include access to open space areas. Refer to analyses in Urban Design Policies UD-A.2 and UD-A.3.	
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 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. c. Provide innovative designs for a variety of housing types to meet the needs of the population.	Refer to analyses in Urban Design Goal B. Also refer to analyses in Policy LU-H.1a and Policy ME-A.1. The project requests a deviation from the maximum allowable height of the proposed single-family residential of 30 feet, allowed under the Land Development Code, to 35 feet. Nonetheless, the project would be compatible with the surrounding community, as discussed in Section 5.17, Visual Effects/Neighborhood Character. Proposed residences would be setbacks from existing residences located near the site and, therefore, are not expected to cast shadows or create wind tunnels that would affect existing development.	The project would be consistent with this policy.
Policy UD-B.2	Achieve a mix of housing types within single developments. a. Incorporate a variety of unit types in multifamily projects. b. Incorporate a variety of single-family housing types in single-family projects/subdivisions. c. Provide transitions of scale between higher-density development and lower density neighborhoods. d. Identify sites for revitalization and additional housing opportunities in neighborhoods.	Refer to analyses in Urban Design Goal B and Policy LU-H.1 and LU-H.3 The project site is currently developed with one existing single-family residence, several outbuildings and associated sheds, and a large asphalt area. Therefore, the project would result in revitalization and additional housing at an under-utilized site.	The project would be consistent with this policy.
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.	Refer to analyses in Urban Design Policy UD-A.6. Entries to the proposed single-family residences and the multi-family residential building would be provided at the ground level.	The project would be consistent with this policy.

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	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.		
Policy UD-B.5	Design or retrofit streets to improve walkability, strengthen connectivity, and enhance community identity. a. Design or retrofit street systems to achieve high levels of connectivity within the neighborhood street network that link individual subdivisions/projects to each other and the community. b. Avoid closed loop subdivisions and extensive cul-de-sac systems, except where the street layout is dictated by the topography or the need to avoid sensitive environmental resources. c. Design open ended cul-de-sacs to accommodate visibility and pedestrian connectivity when development of cul-de-sacs is necessary. d. Emphasize the provision of high-quality pedestrian and bikeway connections to transit stops/stations, village centers, and local schools. e. Design new streets and consider traffic calming where necessary, to reduce neighborhood speeding (see also Mobility Element, Policy ME-C.5). f. Enhance community gateways to demonstrate neighborhood pride and delineate boundaries. g. Clarify neighborhood roadway intersections through the use of special paving and landscape.	Refer to analyses in *Policy ME-A.2* The proposed project would include an extension of Cypress Canyon Road from east to west through the project site. Proposed sidewalks and roadways would connect to existing circulation within Cypress Canyon Road, which would promote interconnectivity between surrounding neighborhoods and open space areas such as Cypress Canyon Park. The proposed extension of Cypress Canyon Road would connect to existing pedestrian and bicycle circulation. Additionally, the project would include connectivity to Cypress Canyon Park The project would include a cul-de-sac. However, the street layout for the project is dictated by both the topography and the need to avoid sensitive environmental resources to the south and north of the project's development footprint. Although the project would include engineered slopes and conventional and mechanically stabilized earth retaining walls, the project would be consistent with the surrounding residential development and therefore would not separate these uses.	The project would be consistent with this policy.

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	h. Develop a hierarchy of walkways that delineate village pathways and link to regional trails. i. Discourage use of walls, gates and other barriers that separate residential neighborhoods from the surrounding community and commercial areas.		
Public Facilities, Services, and Safety Element			
Policy PF- B.4	Recommend development proposals to fully address impacts to public facilities and services. a. Identify the demand for public facilities and services resulting from new development. 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 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.	As described above, the project would require a Community Plan Amendment to change the existing residential designation from a density of 1.1 du/ac to a density of 2.7 du/ac. The Community Plan Amendment would be implemented upon approval of the project and would revise the maximum allowed units at the project site from 45 units to a maximum of 112 units. Impacts to public services and facilities resulting from the proposed project are analyzed in Section 5.14, Public Services and Facilities; and Section 5.15, Public Utilities. As concluded in Section 5.14, Public Services and Facilities, the project would not result in a significant demand on public services and facilities that would result in the need for construction of additional facilities. Impacts were determined to be less than significant. As discussed in Section 5.15, Public Utilities, utilities associated with the project would connect to existing utility lines and would not require the expansion of existing or new facilities. Impacts would be less than significant.	The project would be consistent with this policy.
Policy PF-B.5	Require a fiscal impact analysis to identify operations and maintenance costs with a community plan amendment proposal of potential fiscal significance.	Refer to analysis for Policy PF-B.4	The project would be consistent with this policy.
Policy PF-B.6	Incentivize physical improvements that fully address impacts to public facilities and services, when a nexus exists, that would benefit the affected community planning area.	As discussed in Section 5.14, Public Services and Facilities, implementation of the project would increase the demand for public services and facilities including police and fire protection services, parks and recreation facilities, schools, and libraries. However, the project would be adequately served by existing fire and police protection services, and there would be no need to expand or build new police or fire facilities as a result of the project. Additionally, the project would increase student enrollment at nearby schools. However, development impact fees would also be paid to the San Diego Unified School District, and there would be no need to expand or build new school facilities as a result of the project. With regard to parks and recreation facilities, the project would increase demand for recreational areas or uses in the community. Citywide Park Development Impact Fees would be paid to the City of San Diego, there would be no need to expand or build new park facilities as a result of the project, and the project would include connectivity to Cypress Canyon Park. Finally, the project would increase the use of library facilities;	The project would be consistent with this policy.

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		however, the project would pay a development impact fee that would be used by the library to expand government services. Impacts to public services and facilities were deemed to be less than significant.	
Policy PF-B.9.	Maintain an infrastructure and public spaces program to ensure that public infrastructure and spaces needed to serve new development is provided. a. Ensure new development pays its proportional fair-share of public facilities costs through applicable DIFs pursuant to the California Government Code. b. Ensure DIFs are updated frequently and evaluated periodically to ensure the fees are sufficient to provide the infrastructure needed to serve new development.	Refer to analysis for Policy BF-B.6.	The project would be consistent with this policy.
D. Fire-Rescue Goals	Protection of life, property, and environment by delivering the highest level of emergency and fire-rescue services, hazard prevention, and safety education. Minimize fire hazards resulting from structural or wildland fires. Manage fuel loads in wildland areas.	As discussed in Section 5.14, Public Services and Facilities, implementation of the project would increase the demand for public services and facilities including fire protection services; however, the project would be adequately served by existing fire protection services. For additional information, refer to Section 5.14, Public Services and Facilities. As described in Section 5.19, Wildfire, the project would include one fully irrigated Zone 1 BMZ extending up to 57 feet from the single-family structures and up to 80 feet from the multi-family units to the point where manufactured slopes transition from 4:1 to 2:1. The strip of land between a manufactured slope and the western property boundary of Lot 100 is an HOA maintained open space area Further, structures on site would be built to Chapter 7A standards.	The project would be consistent with this goal.
Policy PF-D.5	Maintain service levels to meet the demands of continued growth and development, tourism, and other events requiring fire-rescue services.	Refer to the analysis for General Plan Public Facilities Element Goal D.	The project would be consistent with this policy.
Policy PF-D.12	Protect communities from unreasonable risk of wildfire within very high fire hazard severity zones. a. Assess site constraints when considering land use designations near wildlands to avoid or minimize wildfire hazards as part of a community plan update or amendment. (see also LU-C.2.a.4) b. Identify building and site design methods or other methods to minimize damage if new structures are located in very high fire hazard severity zones on undeveloped land and when rebuilding after a fire. c. Require ongoing brush management to minimize the risk of structural damage or loss due to wildfires.	The project is located within a very high fire hazard severity zone. As detailed in Section 5.19, Wildfire, due to existing site constraints the project would not meet the standard requirements outlined for BMZs on the project site. Table 5.19-1 details the alternative compliance measures that the project would implement to adequately meet fire standards. The project would include one fully irrigated Zone 1 BMZ extending up to 57 feet from the single-family structures and up to 80 feet from the multi-family units to the point where manufactured slopes transition from 4:1 to 2:1. The strip of land between a manufactured slope and the western property boundary of Lot 100 is an HOA maintained open space area. In addition, all habitable structures would be equipped with automatic alarm and sprinkler systems and would have fire resistance construction per Chapter 7A of the CBC. Refer to the analysis for General Plan Public Facilities Element Goal D.	The project would be consistent with this policy.

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	d. Provide and maintain water supply systems to supplies for structural fire suppression. e. Provide adequate fire protection. (see also PF-D.1 and PF-D.2)		
Policy PF-D.13	Incorporate fire safe design into development within very high fire hazard severity zones to have fire-resistant building and site design, materials, and landscaping as part of the development review process. a. Locate, design and construct development to provide adequate defensibility and minimize the risk of structural loss from wildland fires. b. Design development on hillsides and canyons to reduce the increased risk of fires from topography features (i.e., steep slopes, ridge saddles). c. Minimize flammable vegetation and implement brush management best practices in accordance with the Land Development Code. d. Design and maintain public and private streets for adequate fire apparatus vehicles access (ingress and egress), and install visible street signs and necessary water supply and flow for structural fire suppression. e. Coordinate with the Fire-Rescue Department to provide and maintain adequate fire breaks where feasible or identify other methods to slow the movement of a wildfire in very high fire hazard severity zones.	The project site is located within a Very High Fire Hazard Severity Zone. However, the project would include brush management zones and fuel modification area vegetation management shall occur as-needed for fire safety, in compliance with the BMZ requirements detailed in Section 5.19, Wildfire, and as determined by the San Diego Fire Rescue Department. The project would also use drought-tolerant, naturalized landscaping and a Brush Management Plan has been developed for the proposed project and is included as Appendix F to Appendix L3, Fire Fuel Load Modeling Report. The project would be required to design, construct, and maintain structures, private drives, and facilities in compliance with applicable local, regional, state, and federal requirements related to fire safety, emergency access, and evacuation plans, as well as building materials, setbacks, water supply, hydrants, fire-flow, and defensible space requirements for development in fire hazard areas. As a result, the project was determined to have less-than-significant impacts from wildfire hazards.	The project would be consistent with this policy.
Policy PF-D.14	Implement brush management along City-maintained roads in very high fire hazard severity zones adjacent to open space and canyon areas.	A Brush Management Plan has been developed for the proposed project and is included as Appendix F to Appendix L3, Fire Fuel Load Modeling Report.	The project would be consistent with this policy.
Policy PF-D.15	Maintain access for fire apparatus vehicles along public streets in very high fire hazard severity zones for emergency equipment and evacuation.	Access to the project site would be constructed to current City emergency access road standards. Primary access to the project site would be provided via Cypress Canyon Road. Additional access would be provided to the northeast portion of the project site via Mundial Street.	The project would be consistent with this policy.
Policy PF-E.2.	Maintain average response time goals as development and population growth occurs. Average response time guidelines are as follows: • Priority E Calls (imminent threat to life) within 7 minutes. • Priority 1 Calls (serious crimes in progress) within 12 minutes.	As discussed in Section 5.14, Public Services and Facilities, implementation of the project would increase the demand for public services and facilities including police protection services; however, the project would be adequately served by existing police protection services. For additional information, refer to Section 5.14, Public Services and Facilities.	The project would be consistent with this policy.

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	• Priority 2 Calls (less serious crimes with no threat to life) within 30 minutes. • Priority 3 Calls (minor crimes/requests that are not urgent) within 90 minutes. • Priority 4 Calls (minor requests for police service) within 90 minutes		
Policy PF-E.6.	Monitor how development affects average police response time goals and facilities needs (see also PF-C.5).	Refer to the analysis for Policy PF-E.2.	The project would be consistent with this policy.
Policy PF-E.7.	Maintain service levels to meet demands of continued growth and development, tourism, and other events requiring police services.	Refer to the analysis for Public Facilities Goal C.	The project would be consistent with this policy.
F. Wastewater	Environmentally sound collection, treatment, re-use, disposal, and monitoring of wastewater.	The project would connect to the City's sewer system. Wastewater from the project would ultimately be conveyed through the City's Municipal Wastewater System to the North City Water Reclamation Plant for treatment and disposal. The project would construct new sewer lines to connect the project site to the existing sewer system. On-site sewer systems would be private and would be designed in accordance with state and local plumbing code standards. Alternatively, the private sewer systems within each unit would be designed in accordance with the City's Sewer Design Guide. As discussed in Section 5.15, Public Utilities, the applicant has coordinated with water and wastewater providers to ensure that adequate service levels would be available with the implementation of the project. As such, the project would result in less-than-significant impacts to the City's wastewater system.	The project would be consistent with this goal.
Policy PF-F.4	Maintain conveyance and treatment capacity.	Refer to the analysis for General Plan Public Facilities Element Goal F.	The project would be consistent with this policy.
Policy PF-F.5	Construct and maintain facilities to accommodate regional growth projections that are consistent with sustainable development policies (see also Conservation Element, Section A).	Refer to the analysis for General Plan Public Facilities Element Goal F.	The project would be consistent with this policy.
Policy PF-F.6	Coordinate land use planning and wastewater infrastructure planning to provide for future development and maintain adequate service levels.	Refer to the analysis for General Plan Public Facilities Element Goal F.	The project would be consistent with this policy.
G. Stormwater Infrastructure Goals	Protection of beneficial water resources through pollution prevention and interception efforts. A storm water conveyance system that effectively reduces pollutants in urban runoff and storm water to the maximum extent practicable.	Refer to the analysis included in Policy UD-A.8. The project would not adversely affect existing drainage patterns. The project would result in an overall increase in runoff flows from the project site. However, to address issues of storm water treatment from increased runoff, the project would include on-site bioretention and hydromodification features, which would be implemented in accordance with the federal Clean Water Act and California RWQCB for the San Diego region municipal stormwater NPDES permit (MS4 Permit). The Drainage Study concluded that the total flow rates	The project would be consistent with this goal.

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		after detention would be less than or equal to existing flows. In addition, as discussed in Section 5.18, Water Quality, the project would adhere to the City's Stormwater Standards and would result in less-than-significant impacts to water quality.	
Policy PF-G.1	Ensure that all storm water conveyance systems, structures, and maintenance practices are consistent with federal Clean Water Act and California RWQCB NPDES Permit standards.	Refer to the analyses for Public Facilities Element Goal G and Policy UD-A.8.	The project would be consistent with this policy.
Policy PF-G.2	Install infrastructure that, where feasible, includes components to capture, minimize, and prevent pollutants in urban runoff from reaching receiving waters and our potable water supplies.	Refer to the analyses for Public Facilities Element Goal G and Policy UD-A.8.	The project would be consistent with this policy.
Policy PF-G.5	Identify and implement BMPs for projects that repair, replace, extend, or otherwise affect the stormwater conveyance system. These projects should also include design considerations for maintenance, inspection, and, as applicable, water quality monitoring.	Refer to the analyses for Public Facilities Element Goal G and Policy UD-A.8.	The project would be consistent with this policy.
H. Water Infrastructure	Water supply infrastructure that provides for the efficient and sustainable distribution of water.	The City's Public Works Department would provide domestic water to the project. Each unit within the project is proposed to have a private domestic water system and a private fire protection system. In accordance with City of San Diego standards, private domestic water systems would include a meter and backflow preventer, and private fire protection systems would include backflow preventers. The applicant has coordinated with the City Water Department to ensure that adequate water supplies are available with the implementation of the project. As discussed in Section 5.15, Public Utilities, the project would result in less-than-significant impacts to water supplies.	The project would be consistent with this goal.
Policy PF-H.3	Coordinate land use planning and water infrastructure planning with local, state, and regional agencies to provide for future development, maintain adequate service levels, and ensure adequate water supply during emergency situations. a. Plan for a water supply and emergency reserves to meet peak load demand during a natural disaster such as a fire or earthquake. b. Plan for water supply and emergency reserves recognizing anticipated Climate Change impacts. c. Recognize the water/energy nexus. Plan and implement water projects after consideration of their energy demands in coordination with energy suppliers to minimize and optimize the energy impact of projects.	Refer to the analysis for Public Facilities Element Goal H.	The project would be consistent with this policy.

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
I. Waste Management Goals	Maximize diversion of materials from disposal through the reduction, reuse, and recycling of wastes to the highest and best use.	The project would implement a WMP for solid waste generated by the project (see Appendix M-3). The project would comply with all state and local laws regarding solid waste and recycling with the preparation of a WMP. Additionally, the proposed project would be required to adhere to City ordinances, the City's Recycling Ordinance, and the Refuse and Recyclable Materials Storages Regulations. In addition, waste reduction, recycling, and management programs would be implemented as a part of CALGreen.	The project would be consistent with this goal.
Policy PF-I.1	Provide efficient and effective waste collection services. a. Encourage waste reduction and recycling with source-separated collection of materials. b. Provide space for recycling containers and efficient collection.	Refer to the analysis for Public Facilities Element Goal I.	The project would be consistent with this policy.
Policy PF-I.2	Maximize waste reduction and diversion (see also Conservation Element, Policy CE-A.9). a. Conveniently locate facilities and informational guidelines to encourage waste reduction, diversion, and recycling practices. b. Support resource recovery programs that produce soil additives, mulch, or compost from yard debris and organic waste. c. Maximize the separation of recyclable and compostable materials. d. Reduce and recycle C&D debris. Strive for recycling of 100% of inert C&D materials and a minimum of 50% by weight of all other material. e. Encourage advance disposal fees to prevent the disposal of materials that cause handling problems or hazards at landfills.	Refer to the analysis for Public Facilities Element Goal I.	The project would be consistent with this policy.
Policy PF-1.2.a	Conveniently locate facilities and informational guidelines to encourage waste reduction, diversion, and recycling practices.	Refer to the analysis for General Plan Public Facilities Element Goal I. Additionally, the project would implement waste reduction by improving management and recycling programs, both during and after construction, and provide permanent, adequate, and convenient space for individual homes to collect refuse and recyclable material.	The project would be consistent with this policy.
Policy PF-1.2.d	Maximize the separation of recyclable and compostable materials.	Refer to the analysis for Policy PF-1.2.c	The project would be consistent with this policy.
Policy PF-I.2.f	Reduce and recycle C&D debris. Strive for recycling of 100% of inert C&D materials and a minimum of 50% by weight of all other material.	Refer to the analysis for Public Facilities Element Goal I.	The project would be consistent with this policy.

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
Policy PF-M.3.	Integrate the design and siting of safe and efficient public utilities and associated facilities into the early stages of the long range planning and development process, especially in redevelopment/urban areas where land constraints exist.	As discussed in Section 5.15, Public Utilities, the City's Public Works Department would provide domestic water to the project site. The project would connect to existing pipelines and would include improvements to the public water system. The project would also connect to the City's sewer system. The project would construct new gravity sewer lines to connect the project site to the existing gravity sewer system. Wastewater from the project would ultimately be conveyed through the City's Municipal Wastewater System to the North City Water Reclamation Plant for treatment and disposal. Dry utilities, including electric power and natural gas would be provided SDG&E. No major improvements to the local distribution networks are anticipated to be needed to support the growth facilitated by the proposed project. The applicant would work with dry utility providers to ensure utility systems have adequate capacity to serve the project. Telephone, cable TV, and internet service would be available from a variety of providers. The project would also implement a WMP for solid waste generated by the project. As discussed in Section 5.14, Public Services and Facilities, implementation of the project would result in less-than-significant impacts to all public utilities. The project has coordinated with the applicable public utilities providers and would be adequately served.	The project would be consistent with this policy.
Policy PF-M.4.d	For projects, in particular large-scale developments (such as those requiring redevelopment plans, community plan updates, general plan amendments), consult and coordinate with all appropriate public utilities early on to determine the type, size, and location of facilities that are needed to accommodate the project's increased demand.	Refer to analysis for Policy PF-M.3.	The project would be consistent with this policy.
Q. Seismic Safety Goals	Protection of public health and safety through abated structural hazards and mitigated risks posed by seismic conditions. Development that avoids inappropriate land uses in identified seismic risk areas.	Health and Safety are discussed in Section 5.8 of this EIR. However, seismic hazards are discussed in Section 5.6, Geologic Conditions. As determined therein, the project's potential to expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards would be less than significant. Additionally, a geotechnical investigation would be prepared in accordance with the City's "Guidelines for Geotechnical Reports" and would be reviewed for adequacy by the Geology Section of Development Services. The project would also be required to adequately demonstrate compliance with the CBC and applicable geologic hazards regulations. Upon preparation of a final, design-specific geotechnical investigation report, all potential impacts due to geologic conditions would be reduced to less-than-significant levels.	The project would be consistent with this goal.
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	Refer to the analysis for Public Facilities Goal Q.	The project would be consistent with this policy.

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	include consideration of seismic and other geologic hazards. This information should be disclosed, when applicable, in the 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.		
Policy PF-Q.2	Maintain or improve integrity of structures to protect residents and preserve communities. b. Continue to consult with qualified geologists and seismologists to review geologic and seismic studies submitted to the City as project requirements.	Refer to the analysis for Public Facilities Goal Q.	The project would be consistent with this policy.
		Recreation Element	
Policy RE-A.10	Encourage private development to include recreation facilities, such as children's play areas, rooftop parks and courts, usable public plazas, and mini-parks (see also Urban Design Policies, UD-B.8 and UD-C.5) a. Consider private recreation facilities when evaluating development park needs when it is clearly identified that the facilities and programs provide a public benefit and are bound by easements and agreements that remain in effect in perpetuity according to adopted policies (see also RE-C.6.).	The proposed recreational development include road connectivity to allow for pedestrian and bicycle connectivity. Specifically, the proposed connection of Cypress Canyon Road between Angelique Street and Cypress Canyon Park Drive would provide pedestrian connectivity and bicycle connectivity. A non-contiguous sidewalk along Cypress Canyon Road would provide pedestrian connectivity to the Cypress Canyon Park for residents west of the project site.	The project would be consistent with this policy.
Policy RE-A.19	Ensure that all development impact fees and assessments collected for the acquisition and development of population-based parks and recreation facilities be used for appropriate purposes in a timely and equitable manner.	Refer to the analysis for Public Facilities, Services, and Safety Element Goal C. The project would be required to pay Citywide Park Development Impact Fees to fund parks and recreation facilities.	The project would be consistent with this policy.
Policy RE-C.2	Protect, manage and enhance population- and resource-based parks and open space lands through appropriate means, which include sensitive planning, park and open space dedications, and physical protective devices.	The project would include open space to the north and south, where existing sensitive habitat is located.	The project would be consistent with this policy.
D. Accessibility	Provision of an inter-connected park and open space system that is integrated into and accessible to the community.	Refer to the analyses for General Plan Recreation Element Goal A and policy UD-A.2.	The project would be consistent with this policy.
Policy RE-D.2	Provide barrier-free trails and outdoor experiences and opportunities for persons with disabilities where feasible.	Refer to the analyses for General Plan Recreation Element Goal A, and Policy UD-A.2.	The project would be consistent with this policy.

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
Policy RE-D.6	Provide safe and convenient linkages to, and within, park and recreation facilities and open space areas. a. Provide pedestrian and bicycle paths between recreation facilities and residential development. b. Designate pedestrian and bicycle corridors, and equestrian corridors where appropriate, that link residential neighborhoods with park and recreation facilities, trails, and open spaces. c. Improve public access through development of, and improvements to, multi-use trails within urban canyons and other open space areas. d. Coordinate efforts with the City's Pedestrian Master Plan, the anticipated Parks Master Plan that incorporates trails master planning or a Trails Master Plan, and the County's trail system to provide safe and convenient linkages between areas (see also Mobility Element, Section A). e. Coordinate with the county, state, and federal governments to ensure planning for and connectivity to trail systems outside of the City such as the Trans-County Trail Plan, San Diego River trails, Sweetwater River trails, Otay Valley trails, the California Coastal Trail, the Pacific Crest Trail and the California Riding and Hiking Trail. f. Identify key trails and access points as a part of community plan updates, discretionary permit reviews, and other applicable land use and park planning documents.	Refer to the analyses for General Plan Recreation Element Goal A, and Policy UD-A.2. The project would include sidewalks and Class III Bike Route to enhance pedestrian and bicycle circulation. Additionally, a non-contiguous sidewalk along Cypress Canyon Road would provide pedestrian connectivity through the project site and to the Cypress Canyon Park for residents west of the project site.	The project would be consistent with this policy.
Policy RE-D.7	Provide public access to open space for recreational purposes. a. Provide public access into MSCP open space for only those recreational purposes deemed compatible with the preservation goals of the MSCP Subarea Plan. b. Provide public access at locations consistent with the goals and policies of the Conservation Element.	Public access would be prohibited within the open space areas due to the presence of existing sensitive habitat.	The project would be consistent with this policy.
Policy RE-F.7	Create or enhance open space multi-use trails to accommodate, where appropriate, pedestrians/hikers, bicyclists, and equestrians.	Refer to analysis for Policy UD-A.2.	The project would be consistent with this policy.

Table 5.1-3
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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	a. Develop, adopt and maintain updates of a citywide Trails Master Plan or Parks Master Plan that incorporates trails master planning to guide the provision of and enhancement of open space multi-purpose trails. b. Enhance public access to public open space by clearly identifying trailheads and trail alignments that are consistent with MSCP preservation goals. c. Locate canyon and other open space trails to take advantage of existing pathways and maintenance easements where possible and appropriate. d. Design, construct, and manage trails to: • Consider the context and sensitivity of the area they traverse. • Protect and preserve sensitive natural and cultural resources. • Provide for safe and enjoyable use using best practices (e.g. user management). • Be sustainable and minimize maintenance using best practices (e.g. erosion control). e. Ensure that trails that are considered to be a part of the City's trail system meet one or more of the City's definitions of what constitutes a trail (see Glossary). f. Allow for the closure of existing public trails where such trails are unsafe, unsustainable, redundant, serve only a single private property, lack legal public access, and/or unnecessarily impact environmentally sensitive areas.	The project would not result in updates to the citywide Trails Master Plan or Parks Master Plan. In addition, no existing trails are present at the project site. Therefore Policy *Policy RE-F.7(*a) and *RE-F.7(*f) would not apply to the project.	
		Conservation Element	
Policy CE-A.5	Employ sustainable or "green" building techniques for the construction and operation of buildings.	Refer to the analyses in Land Use Goal I, and Policy UD-A.4. The project would include features that would reduce energy demand, water and resource consumption, and environmental waste, and would generate renewable energy on site. the proposed project would include rooftop photovoltaic solar panels, cool roofs, energy-efficient windows, low-flow plumping, and other design features that significantly conserve energy. In addition, one parking space with a listed cabinet, box, or enclosure connected to a conduit linking the parking spaces with the electrical service, in a manner approved by the building and safety official, to allow for the future installation of EV supply equipment to provide EV charging stations at such time as it is needed for use by the residents.	The project would be consistent with this policy.

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Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
Policy CE-A.7	Construct and operate buildings using materials, methods, and mechanical and electrical systems that ensure a healthful indoor air quality. Avoid contamination by carcinogens, volatile organic compounds, fungi, molds, bacteria, and other known toxins.	Refer to the analyses in Land Use Goal I, and Policy UD-A.4. Additionally, as discussed in Section 5.8, Health and Safety, the demolition of on-site structures and construction of the proposed project would be completed in accordance with regulations and would not result in a significant health risk potential . Impacts would be less than significant.	The project would be consistent with this policy.
Policy CE-A.8	Reduce C&D 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 where feasible.	Refer to the analysis in Public Facilities Goal I. The project would require the demolition of the existing single-family residence and associated sheds on site and the addition of new buildings to provide for 112 residential units. However, the project would reduce C&D waste through implementation of the WMP (Appendix M-3) and existing regulations.	The project would be consistent with this policy.
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.	Refer to the analysis in Public Facilities Goal I.	The project would be consistent with this policy.
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.	Refer to the analysis in Public Facilities Goal I. Additionally, the project would implement waste reduction by providing permanent, adequate, and convenient space for residential units to collect refuse and recyclable material. As discussed in Section 5.15, Public Utilities, the project would be adequately served by landfills and would have less-than-significant impacts on solid waste services.	The project would be consistent with this policy.
Policy CE-A.11	Implement sustainable landscape design and maintenance, where feasible. a. Use integrated pest management techniques, where feasible, to delay, reduce, or eliminate dependence on the use of pesticides, herbicides, and synthetic fertilizers. c. Decrease the number of impervious surfaces in developments, especially where public places, plazas and amenities are proposed to serve as recreation opportunities. d. Strategically plant deciduous shade trees, evergreen trees, and drought tolerant native vegetation, as appropriate, to contribute to sustainable development goals.	The project would utilize integrated pest management to maintain the landscaping on the project site. The project would incorporate drought-resistant, naturalized landscaping. New trees would be planted on the project site as part of the landscaping plan for the project site. The project would maximize pervious surfaces wherever feasible. Open space would be provided at the northern and southern portion of the project site, which would remain pervious. The use of drought-tolerant, naturalized landscaping would also reduce water usage for irrigation. The project design would also include on-site biofiltration and hydromodification features to reduce stormwater runoff. The project would install new tree plantings to provide shade and reduce heat island effect. High-efficiency plumbing fixtures and fittings would be installed in all structures. Recycled water would be used instead of potable water for irrigation of landscaping.	The project would be consistent with this policy.

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	e. Reducing the use of lawn types that require high levels of irrigation. f. Strive to incorporate existing trees and native vegetation into site designs. g. Minimize the use of landscape equipment powered by fossil fuels. h. Implement water conservation measures in site/building design and landscaping. i. Encourage the use of high efficiency irrigation technology, and recycled site water to reduce the use of potable water for irrigation. Use recycled water to meet the need of development project to the maximum extent feasible.		
B. Open Space and Landform Preservation	Preservation and long-term management of the natural landforms and open spaces that help make San Diego unique.	Refer to the analyses in Policies UD-A.2 and CE-A.11. The project includes the preservation of 7.97 acres of open space. The existing open space at the northern and southern portion of the project site would remain under the proposed project. The wetlands on site are human-made and not city jurisdictional wetlands.	The project would be consistent with this goal.
Policy CE-B.1	Protect and conserve the landforms, canyon lands, and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities. a. Utilize Environmental Growth Funds and pursue additional funding for the acquisition and management of MHPA and other important community open space lands. c. Protect urban canyons and other important community open spaces including those that have been designated in community plans for the many benefits they offer locally, and regionally as part of a collective citywide open space system (see also Recreation Element, Sections C and F; Urban Design Element, Section A). d. Minimize or avoid impacts to canyons and other environmentally sensitive lands by relocating sewer infrastructure out of these areas where possible, minimizing construction of new sewer access roads into	Refer to the analyses in Conservation Goal B, and Policies UD-A.1, UD-A.2, and CE-A.11. The project would construct new gravity sewer lines to connect the project site to the existing gravity sewer system. On-site sewer systems would be private and would be designed in accordance with state and local plumbing code standards. The project site is currently located within the City's MSCP and would require a BLA. Sewer improvements are proposed within the project's development footprint and would not be located within open space areas. However, upon approval of the BLA, new sewer infrastructure would not impact canyons or other environmentally sensitive lands.	The project would be consistent with this policy.

Table 5.1-3
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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	these areas, and redirecting of sewage discharge away from canyons and other environmentally sensitive lands. e. Encourage the removal of invasive plant species and the planting of native plants near open space preserves. f Pursue formal dedication of existing and future open space areas throughout the City, especially in core biological areas of the City's adopted MSCP Subarea Plan. g. Require sensitive design, construction, relocation, and maintenance of trails to optimize public access and resources conservation.		
Policy CE-B.4	Limit and control runoff, sedimentation, and erosion both during and after construction activity.	Refer to the analyses in Public Facilities Goal G and Policy UD-A.8.	The project would be consistent with this policy.
Policy CE-B.5	Maximize the incorporation of trails and greenways linking local and regional open space and recreation areas into the planning and development review processes.	Refer to the analyses in Policy UD-A.2.	The project would be consistent with this policy.
Policy CE-B.6	Provide an appropriate defensible space between open space and urban areas through the management of brush, the use of transitional landscaping, and the design of structures (see also Urban Design Element, Policy UD-A.3.o). Continue to implement a citywide brush management system.	Refer to the analysis in Policies UD-A.3 and CE-A.11.	The project would be consistent with this policy.
E. Urban Runoff Management Goals	Protection and restoration of water bodies, including reservoirs, coastal waters, creeks, bays and wetlands.	Wetlands within the project site consist of emergent wetlands and disturbed herbaceous wetlands. As discussed in Section 5.4, Biological Resources, the project would directly impact aquatic resources estimated to include the jurisdiction of RWQCB and CDFW, including wetlands (i.e., emergent wetland and disturbed herbaceous wetland) and non-wetland waters (natural flood channel) in the study area (Table 5.4-4). As described in Section 5.4.1, Existing Conditions, none of the potential jurisdictional resources are considered wetlands under the City's definition or waters of the United States considering they are human-made. The project has been designed to minimize project indirect impacts to wetland buffers through (1) re-planting native species on the proposed manufactured slopes in order to increase the function of the adjacent wetland buffer and (2) installing a fence along the boundary between the project construction footprint and the MHPA, to discourage human intrusion into sensitive vegetation communities. The project would not impact other water bodies including reservoirs, coastal waters, creeks, or bays.	The project would be consistent with this goal.

Table 5.1-3
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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
Policy CE-E.2	Apply water quality protection measures to land development projects early in the process-during project design, 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 drainage into the MHPA or open space areas. c. Reduce the number 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.	Refer to the analysis for Conservation Element Policy CE-A.11, regarding landscaping; Policy CE-A.11, regarding erosion; Policy CE-B.4, regarding drainage and runoff; and Policy CE-B.1, regarding the MHPA. In addition, use of pesticides and herbicides would be minimized. The project has been designed to protect the natural integrity of the existing topography and sensitive habitat on site.	The project would be consistent with this policy.
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.	Refer to the analysis for Conservation Element Policy CE-B.4.	The project would be consistent with this policy.
Policy CE-E.6	Continue to encourage "Pollution Control" measures to promote the proper collection and disposal of pollutants at	Refer to the analysis for Conservation Element Policy CE-B.4.	The project would be consistent with this policy.

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	the source, rather than allowing them to enter the storm drain system.		
F. Air Quality	Regional air quality that meets state and federal standards. Reduction in greenhouse gas emissions effecting climate change.	As discussed in Section 5.3, Air Quality, the project would result in less-than-significant impacts to air quality with mitigation and would meet applicable air quality standards. The project would incorporate MM-AQ-1, which would ensure that all 75 horsepower or greater diesel-powered equipment are powered with CARB certified Tier 4 Interim engines or better where applicable. As discussed in Section 5.7, Greenhouse Gas Emissions, the project would result in a potentially significant impact from greenhouse gas emissions. However, the project would implement MM-GHG-1, MM-GHG-2, and MM-GHG-3 to reduce the impacts to the extent feasible.	The project would be consistent with this goal.
Policy CE-F.4	Preserve and plant trees and vegetation that are consistent with habitat and water conservation policies and that absorb carbon dioxide and pollutants.	Refer to the analysis for Conservation Element Policy CE-A.11. The proposed landscaping would include native and naturalized vegetation types to establish open space and would occur within the proposed development footprint. The proposed revegetation plant palette consists of trees, riparian container planting, an ornamental native and erosion control hydroseed mix. Container planting and hydroseeding of disturbed areas with a mixture of native grasses, shrubs, and groundcover would provide surface cover and erosion control.	The project would be consistent with this policy.
G. Biological Diversity	Preservation of healthy, biologically diverse regional ecosystems and conservation of endangered, threatened, and key sensitive species and their habitats.	Potential direct and indirect impacts to sensitive biological resources would be mitigated to a less-than-significant level. The City's MHPA currently overlaps the majority of the project site. Thus, the project has proposed a BLA to ensure the project does not encroach the MHPA. Refer to Section 5.4, Biological Resources, for additional information.	The project would be consistent with this goal.
Policy CE-G.1	Preserve natural habitats pursuant to the MSCP, preserve rare plants and animals to the maximum extent practicable, and manage all City-owned native habitats to ensure their long-term biological viability.	The City's MHPA currently overlaps the majority of the project site. As such, the project has proposed a BLA to ensure the project does not encroach the MHPA. As part of the BLA, an off-site MHPA BLA parcel would be incorporated into the City's MHPA preserve boundary to account for loss of MHPA areas. The project would adhere to the City's MSCP Land Use Adjacency Guidelines.	The project would be consistent with this policy.
H. Wetlands	Preservation of San Diego's rich biodiversity and heritage through the protection and restoration of wetland resources. Preservation of all existing wetland habitat in San Diego through a "no net loss" approach.	Refer to the analysis for Conservation Element Goals B and E.	The project would be consistent with this goal.
Policy CE-H.7	Encourage site planning that maximizes the potential biological, historic, hydrological, and land use benefits of wetlands.	Refer to the analysis for Conservation Element Goal E. The project has been designed to protect the existing topography, sensitive habitat, and hydrology on site. The proposed project includes open space in the northern and southern portions of the project site. Within the open space area, undeveloped manufactured slopes would be restored on the project site and	The project would be consistent with this policy.

Table 5.1-3
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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		would remain or be added into the MHPA. The proposed project would include restoration activities that would improve conditions of the artificial herbaceous wetland on site. Impact to the natural flood channel and emergent wetland on site would occur but are expected to be mitigated with CDFW and RWQCB requirements. As discussed in Section 5.9, Historic Resources, no historic resources are present on site.	
Policy CE-I.4	Maintain and promote water conservation and waste diversion programs to conserve energy.	Refer to the analysis for Conservation Element Goal I. Additionally, the project would implement sustainability measures to decrease water and resource consumption, including high-efficiency plumbing fixtures and fittings and landscaping with non-invasive drought-tolerant native species. The project would also implement energy conservation measures including rooftop photovoltaic solar panels, consistent with Title 24 requirements.	The project would be consistent with this policy.
Policy CE-I.5	Support the installation of photovoltaic panels, and other forms of renewable energy production. a. Promote the use and installation of renewable energy alternatives in new and existing development.	As discussed in Section 3.3.2, rooftop photovoltaic solar panels would be implemented, consistent with Title 24 requirements.	The project would be consistent with this policy.
Policy CE-I.10	Use renewable energy sources to generate energy to the extent feasible.	Refer to the analysis for Policy CE-1.5.	The project would be consistent with this policy.
Policy CE-J.4	Continue to require the planting of trees through the development permit process. a. Consider tree planting as mitigation for air pollution emissions, storm water runoff, and other environmental impacts as appropriate.	Refer to the analysis for Policy CE-F.4.	The project would be consistent with this policy.
		Noise Element	
A. Noise and Land Use Compatibility Goal	Consider existing and future noise levels when making land use planning decisions to minimize people's exposure to excessive noise.	A Noise Analysis Technical Report was prepared for the project and is incorporated as Appendix J to this EIR. Section 5.11, Noise. Section 5.1.3.6, Issue 6: Noise Element Standards, addresses noise element compatibility. The project would be in compliance with the City's guidelines for noise-compatible land uses as shown in Table 5.1-1, which reproduces Table NE-3 of the General Plan.	The project would be consistent with this goal.
Policy NE-A.1	Separate excessive noise-generating uses from residential and other noise-sensitive land uses with a sufficient spatial buffer of less sensitive uses.	Refer to the analysis for Noise Element Goal A. Existing noise-sensitive land uses in the project area include existing residential uses. However, the predicted sound emission level from the combination of on-site stationary operating units do not exceed City thresholds.	The project would be consistent with this goal.
Policy NE-A.2	Assure the appropriateness of proposed developments relative to existing and future noise levels by consulting the guidelines for noise-compatible land use (shown on Table NE-3) to minimize the effects on noise-sensitive land uses.	Refer to the analysis for Noise Element Goal A and Policy NE-A.1. The project would be in compliance with the City's guidelines for noise-compatible land uses as shown in Table NE-3 of the General Plan.	The project would be in conformance with this policy.
Policy NE-A.3	Limit future residential and other noise-sensitive land uses in areas exposed to high levels of noise.	Refer to the analysis for Noise Element Goal A.	The project would be in conformance with this policy.

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
Policy NE-A.4	Require an acoustical study consistent with acoustical study guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the "compatible" noise level thresholds as indicated on the land use–noise compatibility guidelines (Table NE-3), so that noise mitigation measures can be included in the project design to meet the noise guidelines.	Refer to the analysis for Noise Element Goal A and Policy NE-A.2.	The project would be in conformance with this policy.
Policy NE-A.5	Prepare noise studies that address existing and future noise levels from noise sources that are specific to a community when updating community plans.	Refer to the analysis for Noise Element Goal A.	The project would be in conformance with this policy.
B. Motor Vehicle Traffic Noise Goal	Minimal excessive motor vehicle traffic noise on residential and other noise-sensitive land uses.	The ambient noise in the project area would be primarily generated by traffic; however, the noise generated from the project's increase in traffic would not impact nearby residential or other sensitive land uses.	The project would be in conformance with this goal.
Policy NE-B.2	Consider traffic calming design, traffic control measures, and low-noise pavement surfaces that minimize motor vehicle traffic noise (see also Mobility Element, Policy ME–C.5 regarding traffic calming)..	As discussed in Section 5.11, Noise, the long-term operational noise from roadway traffic associated with the implementation of the project would result be below the City's threshold for significant change in the ambient noise environment, and impacts would be less than significant.	The project would be consistent with this policy.
Policy NE-B.3	Require noise reducing site design, and/or traffic control measures for new development in areas of high noise to ensure that the mitigated levels meet acceptable dB limits.	Refer to the analysis for Noise Element Policy NE-B.2.	The project would be consistent with this policy.
Policy NE-B.4	Require new development to provide facilities that support the use of alternative transportation modes such as walking, bicycling, carpooling, and, where applicable, transit to reduce peak-hour traffic.	The project's circulation system is designed to interconnect with the existing adjacent public street system. The proposed sidewalks would promote pedestrian interconnectivity to surrounding neighborhoods and open space areas. The project's internal street network would consist of private drives that accommodate automobiles, bicycles, and pedestrians.	The project would be in conformance with this policy.
D. Aircraft Noise Goal	Minimal excessive aircraft-related noise on residential and other noise-sensitive land uses.	The nearest airport is the MCAS approximately 4 miles southwest of the project site. The project site is not located within a noise compatibility zone of the MCAS Miramar Airport; thus, aircraft-related noise would not be a concern for the project.	The project would be consistent with this goal.
Policy NE-D.1	Encourage noise-compatible land use within airport influence areas in accordance with federal and state noise standards and guidelines.	Refer to the analysis Noise Element Goal D.	The project would be in conformance with this policy.
G. Construction, Refuse Vehicles, Parking Lot Sweepers, and Public Activity Noise Goal	Minimal exposure of residential and other noise-sensitive land uses to excessive construction, refuse vehicles, parking lot sweeper-related noise and public noise.	Refer to the analysis for Noise Element Goal A and Policy NE-A.1.	The project would be consistent with this goal.
Policy NE-G.1	Implement limits on the hours of operation for non-emergency construction, refuse vehicle, and parking lot sweeper activity in residential areas and areas abutting residential areas.	Refer to the analysis for Noise Element Goal A. Additionally, the project would comply with the requirements set forth in the City's noise ordinance, including limiting construction activity to 7 a.m. to 7 p.m.	The project would be in conformance with this policy.

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
I. Typical Noise Attenuation Methods Goal	Attenuate the effect of noise on future residential and other noise-sensitive land uses by applying feasible noise mitigation measures.	Refer to the analysis for Noise Element Goal A and Policy NE-A.1.	The project would be in conformance with this goal.
Policy NE-1.1	Require noise attenuation measures to reduce the noise to an acceptable noise level for proposed developments to ensure an acceptable interior noise level, as appropriate, in accordance with California's noise insulation standards (California Code of Regulations [CCR] Title 24) and Airport Land Use Compatibly Plans.	Refer to the analysis for Noise Element Goal A and Noise Element Goal D.	The project would be consistent with this policy.
Policy NE-1.2	Apply CCR Title 24 noise attenuation measures requirements to reduce the noise to an acceptable noise level for proposed single-family, mobile homes, senior housing, and all other types of residential uses not addressed by CCR Title 24 to ensure an acceptable interior noise level, as appropriate.	Refer to the analysis for Noise Element Goal A.	The project would be consistent with this policy.
Policy NE-I.3	Consider noise attenuation measures and techniques addressed by the Noise Element, as well as other feasible attenuation measures not addressed as potential mitigation measures, to reduce the effect of noise on future residential and other noise-sensitive land uses to an acceptable noise level.	Refer to the analysis for Noise Element Goal A and Policy NE-A.1.	The project would be in conformance with this policy.
Historic Preservation Element			
A. Identification and Preservation of Historical Resources Goals	Identification of the historical resources of the City. Preservation of the City's important historical resources. Integration of historic preservation planning in the larger planning process.	As discussed in Section 5.9, Historical Resources, no historic structures or properties exist within the project's APE and the property itself is not eligible to be classified as a historical resource. As such, no impacts to historical resources would occur with implementation of the project.	The project would be consistent with this goal.
Housing Element			
HE-A.2	Update community plans regularly to provide certainty in the development process. Through these updates, the City—working with a broad coalition of community stakeholders—should: • Identify areas appropriate for increased infill, residential, and mixed-use development. • Designate land for a variety of residential densities to meet housing needs for a variety of household sizes. • Encourage location- and resource-efficient development whereby housing is located near employment, shopping, schools, recreation, transit, and walking / bicycling infrastructure.	Refer to analyses in Housing Element Goal 1 and Land Use Element Goal B. The project would include a Community Plan Amendment, which would allow the project to develop both single-family homes and multi-family units and increase the existing residential density designation in order to provide a variety of housing units, including affordable housing, to help meet the City's housing shortage.	The project would be consistent with this goal.

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	• Allow for more FAR. • Adopt Programmatic EIRs to allow EIR tiering for individual projects consistent with the updated plan(s).		
Policy HE-A.3	Require new development to meet applicable zone and land use designation density minimums to ensure efficient use of remaining land available for residential development and redevelopment.	Refer to the analysis for Housing Element Goal 1 and Land Use Element Goal B. The project would result in an increase in density at the project site; therefore, the project would meet the minimum density at the project site.	The project would be consistent with this policy.
Goal 3: Provide New Affordable Housing	The City's housing stock is comprised of a spectrum of housing options that vary in size, type, and age. People often find new housing more desirable than older housing, which leads older housing to be priced at a lower sales or rental price than new housing. Older housing within the City provides some naturally affordable homes, but there are not enough to meet demand. Overall housing production has been too slow to keep pace with population growth over the past 20 years, which has limited the supply of both new and older housing. This trend has increased demand on the supply of older housing and increased the cost of all housing. More affordable housing is needed for extremely low, very low, low, and middle income households. Though increased housing production should help increase the supply and decrease prices for older housing, new affordable housing opportunities are needed now for San Diego's lower income residents. To provide new affordable housing opportunities, the City has identified three objectives: Objective I: Promote a diversity of housing available to all income groups across all communities. Objective J: Administer affordable rental and homeownership assistance programs. Objective K: Support and engage in innovative methods for financing housing development.	The project would include the development of 112 residential units on a site that contains a single residence and primarily undeveloped lot, including 12 multi-family affordable housing units. As discussed in Section 5.13, Population and Housing, California is currently experiencing a housing crisis, and the demand for affordable housing is increasing. Implementation of the project would help meet the need for the housing, both market rate (100 units) and affordable income (12 units). As such, the project would be consistent with goals relating to the provision of new housing and would help the City reach RHNA allocation. Lastly, Objectives I, J, and K are directed to the City and therefore not applicable to the project.	The project would be consistent with this policy.
Policy HE-I.2	Encourage mixed-income developments accessible to lower income residents citywide and especially in high opportunity and resource-rich areas.	Refer to analyses in Housing Element Goal 1 and Goal 2, and Land Use Element Goal B.	
Goal 4: Enhance Quality of Life	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. As a part of the General	As discussed in Section 5.8, Health and Safety, the demolition of on-site structures and construction of the proposed project would be completed in	The project would be consistent with this goal.

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	Plan, the Housing Element also provides guidance for how the City can enhance its communities and neighborhoods as growth occurs. To enhance quality of life, the City has identified three objectives: Objective L: Protect public health and safety Objective M: Create vibrant, equitable communities Objective N: Prevent displacement.	accordance with regulations and implementation of PDF-HAZ-1. Impacts to hazardous materials and toxic substances would be less than significant. Additionally, the project would prepare a CHSP as needed to address potential issues associated with possible impacts to the community in the project site vicinity. The project would include the development of 112 residential units within the Scripps Miramar Ranch Community. The project would also include open space areas. Proposed sidewalks and roadways would connect to existing circulation within Cypress Canyon Road, which would promote interconnectivity between surrounding neighborhoods and open space areas such as Cypress Canyon Park. The project would result in demolition of one existing residence on site.	
Policy HE-M.1	Implement General Plan and community plan goals and policies that relate to architectural design, public spaces, and historical and tribal cultural resources	Refer to the analyses for Housing Element Goal 4, Urban Design Goal A and Policy UD-A.6. The Scripps Miramar Ranch Community Plan objectives include to create a harmonious community appearance by utilizing a compatible variety of architectural styles, building heights, setbacks and different lot sizes.As discussed in Section 5.17, Visual Effects/Neighborhood Character, the proposed development includes a mix of building designs that utilize compatible architectural styles, colors, building heights, lot sizes, setbacks, landscaping, and street furniture harmonious to the existing community appearance.	The project would be consistent with this policy.
Policy HE-M.2	Ensure that new housing fosters a sense of community through development regulations that address building orientation and architectural design features that promote interaction and active lifestyles/commutes.	Refer to the analyses for Housing Element Goal 4, Urban Design Element Goal B, Mobility Element Goal A, and Policy UD-B.1.	The project would be consistent with this policy.
Policy HE-M.4	Engage actively with local tribal representatives to identify opportunities to preserve and feature tribal, cultural, historical, and archaeological resources.	Consultation with Native American tribes has been conducted in accordance with AB 52 and would be conducted per SB 18 requirements. In compliance with AB 52, letters were sent to tribes on May 3, 2022.	The project would be consistent with this policy.

Table 5.1-3
Project's Consistency with City of San Diego's General Plan

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
HE-O.2	Encourage new housing that relies on and supports transit use and environmentally sustainable patterns of movement.	Refer to the analysis in Housing Element Goal 5. The project would include fully equipped EV parking spaces within the project site. Circulation within the project site would accommodate pedestrians and bicycles and would connect to the existing portion Cypress Canyon Road to interconnect to the surrounding neighborhood.	The project would be consistent with this policy.
HE-P.1	Support and encourage high performance design standards in new construction and redevelopment to promote increased energy conservation.	Refer to analyses in Housing Element Goal 5, Conservation Element Goal A, and Policy CE-A.11.	The project would be consistent with this policy.

Notes: du/ac = dwelling units per acre; CEQA = California Environmental Quality Act; EIR = environmental impact report; RHNA = regional housing needs assessment; Community Plan = Scripps Miramar Ranch Community Plan; RX = Residential–Small Lot; RM = Residential–Multiple Unit; OR = Open Space–Residential; CARB = California Air Resources Board; CPTED = Crime Prevention Through Environmental Design; TDM = Transportation Demand Management; EV = electric vehicle; PDF = Project Design Feature; MSCP = Multiple Species Conservation Program; MHPA = Multi-Habitat Planning Area; BLA = boundary line adjustment; CALGreen = California Green Building Standards Code; BMP = best management practice; NPDES = National Pollutant Discharge Elimination System; DIF = Development Impact Fees; HOA = homeowners association; BMZ = Brush Management Zone; CBC = California Building Code; MS4 = Municipal Separate Storm Sewer System; WMP = Waste Management Plan; C&D = Construction and Demolition; RWQCB = Regional Water Quality Control Board; SDG&E = San Diego Gas & Electric; CDFW = California Department of Fish and Wildlife; dB = decibel; MCAS = Marine Corps Air Station; CCR = California Code of Regulations; APE = area of potential effect; FAR = floor area ratio; CHSP = Community Health Safety Plan; AB = Assembly Bill; SB = Senate Bill.

Table 5.1-4
Project's Consistency with Scripps Miramar Ranch Community Plan

Objective/Guideline	Goal/Recommendation	Analysis	Project Consistency
Overall Community Goals	Preserve and enhance the valued natural resources of the Scripps Miramar Ranch community: hills, trees, water resources, Miramar Reservoir, Carroll Canyon, and subsidiary canyons; maximize public benefit through public ownership and/or access, both visual and physical, to these resources. Provide a harmonious physical environment within the community by maximizing preservation of existing stands of trees and foresting appropriate open space areas as development occurs. Maintain and enhance usable open space networks throughout the community by providing continuous open space systems that link such community elements as parks, schools, residential, commercial and industrial areas. Encourage development of open space buffers, which would effectively screen disparate elements of the community. Guarantee that existing public facilities (roads, parks, schools, open space, recreational facilities) shall not be adversely impacted by added population resulting from development in the planning area.	As described in Section 5.17, Visual Effects/Neighborhood Character, development of the project site would result in the removal of numerous eucalyptus trees that are identified in the Community Plan as important public resources. Despite this loss, the existing collection of eucalyptus trees on the project site is not particularly large or visually prominent. Further, development of the project site would include the planting of slope trees, accent trees, or other trees (planting of eucalyptus trees is not proposed) that would contribute vegetative forms, scales, and character to the project site. The project would maintain the open space characteristics of the area by preserving 20.56 acres open space on site once restoration of graded slopes occurs. Refer to the analysis for Conservation Element Goal E. The project would include open space areas at the northern and southern portions of the project site. Open space located at the southern and northern portions of the project site. As discussed in Section 5.14, Public Services and Facilities, impacts to public services, including parks, schools, and recreational facilities, would be less than significant. The project would result in an improved circulation system and connection of Cypress Canyon Road and would not adversely impact roads.	The project would be consistent with these goals.
Residential Element Objectives	The overriding residential goal for Scripps Miramar Ranch is to enhance the present living environment while accommodating residential growth that complements the existing community. The following objectives are set forth to guide future residential development in Scripps Miramar Ranch. Promote a variety of housing types and prices throughout the community in support of the citywide concept of balanced housing opportunities. Support cluster-type housing and PRDs that maximize open space. Integrate open space areas in residential developments to provide continuous open space systems wherever possible. Create a harmonious community appearance by utilizing a compatible variety of architectural styles, building heights, setbacks and different lot sizes.	The project would include the development of both 100 single-family homes and 12 multifamily affordable income rental units within the Scripps Miramar Ranch Community. The architectural style of the proposed development would be consistent throughout residential units to create a sense of community and harmonious appearance. The architectural styles could include California Coastal, Craftsman, Farmhouse, Monterey, Spanish Revival, and/or Tuscan style. The landscaping and architectural design of the project would create compatibility with surrounding communities. The project would include open space areas at the northern and southern portion of the project site. In addition, the project would include circulation to accommodate pedestrians and bicycles, which would promote interconnectivity to surrounding neighborhoods and open space areas such as Cypress Canyon Park.	The project would be consistent with these objectives.
Parks, Recreation, and Open Space Element Objectives	In order to provide a well-balanced and aesthetically pleasing system of open space and recreational facilities and opportunities, the following objectives have been selected to meet this goal: Assure continuation of the open space network throughout the planning area to permit walking between various community facilities and areas, including schools, parks, and residential, commercial, industrial and institutional developments. Guarantee that open space areas are easily accessible to residents and include usable recreation areas that permit such uses as hiking and picnicking.	The project would include 20.56 acres of open space areas at the southern and northern portions of the project site (over 50% of the project site). The project would include the extension of the existing Cypress Canyon Road throughout the project site, which would accommodate recreational use of pedestrians and bicycles. The proposed extension of Cypress Canyon Road would connect to existing pedestrian and bicycle circulation. In addition, the project would promote the interconnectivity to Cypress Canyon Park to the east of the project site. The project would also use drought-tolerant, naturalized landscaping and a Brush Management Plan has been developed for the project. The project would be required to design, construct, and maintain structures, private drives, and facilities in	The project would be inconsistent with these objectives.

Table 5.1-4
Project's Consistency with Scripps Miramar Ranch Community Plan

Objective/Guideline	Goal/Recommendation	Analysis	Project Consistency
	Provide desirable topographic open space buffers as needed between disparate elements of the community. Require developers to set aside at least 25% of the total project area for designation as park and/or open space. Maximize preservation of existing mature eucalyptus groves, natural slopes, and major canyons through careful siting of roadways and structures. Forest open space areas not adjoining Miramar Reservoir at a minimum of 100 eucalyptus trees per acre, thereby expanding the unique and valued eucalyptus environment of this community. Preserve and enhance the valued natural resources of the Scripps Miramar Ranch community: hills, trees, water resources, Miramar Reservoir, Carroll Canyon, and subsidiary canyons. Designate the park site located adjacent to the eastern end of the Miramar Reservoir for passive neighborhood park use, and preserve the site south of Pomerado Road in Carroll Canyon on property adjacent to Alliant International University by including the land as part of the City's MHPA.	compliance with applicable local, regional, state, and federal requirements related to fire safety, emergency access, and evacuation plans, as well as building materials, setbacks, water supply, hydrants, fire-flow, and defensible space requirements for development in fire hazard areas. As described in Section 5.17, Visual Effects/Neighborhood Character, development of the project would include the removal of numerous on-site eucalyptus trees. The project would preserve views of the large existing grove of eucalyptus located to the immediate north of Spring Canyon Road. Project landscaping would not include the planting of eucalyptus trees as part of the landscape plan, as eucalyptus are a non-native species, have shallow roots capable of being uprooted (and can damage foundations), and are commonly understood to be fire hazards; eucalyptus trees removed during site development are not proposed to be replaced on site.	
Public Facilities and Services Element	Given this community's traditional reliance on Mira Mesa for many of its public facilities and services, the goal of this Plan is to assure the availability of adequate public facilities and services to the Scripps Miramar Ranch Community and minimize public and private expenditures through prudent planning of these facilities. The following objectives specify the intent of this goal. Assure the availability of all utilities needed for new development.	As discussed in Section 5.14, Public Services and Facilities, implementation of the project would increase the demand for public services and facilities including police and fire protection services, parks and recreation facilities, schools, and libraries. There would be no need to expand or build new police or fire facilities as a result of the project. Additionally, the project would increase student enrollment at nearby schools. However, development impact fees would also be paid to the San Diego Unified School District, and there would be no need to expand or build new school facilities as a result of the project. With regard to parks and recreation facilities, the project would increase demand for recreational areas or uses in the community. Citywide Park Development Impact Fees would be paid to the City of San Diego, and there would be no need to expand or build new park facilities as a result of the project. The project would include open space areas, and residents would be able to access Cypress Canyon Park by the proposed extension of Cypress Canyon Road. Finally, the project could potentially result in increased utilization of existing library facilities. Furthermore, dispersal of residents to library branches throughout the City is typical, and nearby library branches would be used by both existing and new residents associated with the project. Impacts to public services and facilities were all deemed less than significant.	The project would be consistent with this objective.
Transportation Element Objectives	The goal of this element is to provide an efficient and aesthetically pleasing transportation system for vehicular, bicycle, equestrian, and pedestrian traffic within the community and to the greater metropolitan area. Realization of this goal depends upon identification and successful implementation of more specific objectives outlined below. By emphasizing efficiency, as well as diversity within the Scripps Miramar Ranch	The project's circulation system is designed to interconnect with the existing Cypress Canyon Road, which would interconnect the project and surrounding residential areas. The project's internal street network accommodates automobiles, bicycles, and pedestrians. The streets would include sidewalks along at least one side of the street. The project would provide parking in accordance with City requirements.	The project would be consistent with these objectives.

Table 5.1-4
Project's Consistency with Scripps Miramar Ranch Community Plan

Objective/Guideline	Goal/Recommendation	Analysis	Project Consistency
	circulation system, these objectives provide a more complete answer to residents' transportation needs than presently exists in the community. Provide a continuous pedestrian, equestrian, and bicycle system throughout the community in conjunction with open space areas, minimizing conflicts with vehicular traffic patterns. Encourage and facilitate the use of public transit, carpools, and bicycles within and outside the community in conjunction with ongoing citywide programs. Design of all roadways in the planning area should consider the following objectives: Maintain and enhance the rural, forested character of the community. Support the concepts of hillside preservation and design. Incorporate eucalyptus trees and compatible vegetation in landscaping along roadways where appropriate. Preserve mature trees wherever possible.	As described in Section 5.17, Visual Effects/Neighborhood Character, the project would be consistent with the character of the surrounding community. While the project site includes steep hillsides that would require alteration to accommodate the residential development footprint, the proposed slopes on site would be designed to integrate into existing contours of adjacent hilly terrain) to the extent practicable. Development of the project site would result in the removal of numerous eucalyptus trees; however, development of the project site would include the planting of slope trees, accent trees, or other trees (planting of eucalyptus trees is not proposed) that would contribute vegetative forms, scales, and character to the project site.	
Community Environment Element	On behalf of Scripps Miramar Ranch residents and the greater San Diego community, this Plan seeks to ensure a desirable, healthful and comfortable living and working environment for Scripps Miramar Ranch while preserving the community's valuable natural resources and amenities. To this end the following objectives have been adopted. Minimize visual pollution by controlling location, size, design, maintenance and lighting of outdoor signs. Encourage water and energy conservation, water and sewage reclamation and use of natural channels for drainage systems.	The project would include drought-tolerant, naturalized landscaping. The use of drought-tolerant, naturalized landscaping would reduce water usage for irrigation. The project design would also include on-site biofiltration and hydromodification features to reduce stormwater runoff. Refer to the analysis in Section 5.5, Energy. The proposed development would comply with the California Energy Code (Title 24) and CALGreen. The project would include rooftop photovoltaic solar panels, low-flow plumbing, cool roofs, and other design features to significantly conserve energy.	The project would be consistent with these objectives.
Design Element	The purpose of this element is to ensure that future development within Scripps Miramar Ranch would promote a positive community identity, allow for reasonable freedom of design expression, and maintain the character of existing development. Observance of the guidelines outlined herein during the design of individual projects would meet the objectives of this Plan as well as the Hillside Review process. The intent of these guidelines is presented below. Protect environmental resources that are typically associated with hillsides, preserve significant public views of and from hillsides, and maintain a clear sense of natural hillside topography throughout the development of Scripps Miramar Ranch. Encourage a sensitive form of development on the community's hillsides by allowing for their reasonable use in a manner that complements their natural character and relates to the visual environmental character of the community and the Open Space Element of the General Plan. Encourage design diversity and variety of interpretation but avoid visual chaos and incongruity. Foster a sense of neighborhood identity by encouraging design diversity between development subunits while promoting design integration and compatibility within neighborhood concept areas.	As discussed in Section 5.17, Visual Effects/Neighborhood Character, while the project would result in changes to views of the project site, the project would not result in the blockages of views of public resources; therefore, impacts would be less than significant. The project site includes steep hillsides that would require alteration to accommodate the residential development footprint, the proposed slopes on site would be designed to integrate into existing contours of adjacent hilly terrain) to the extent practicable. As shown in Figure 5.17-12, Cross Sections, proposed grading would generally create steeper slopes compared to existing site topography and, in certain locations, proposed cut and fill would create manufactured terrain requiring retainment that would not be considered "naturalized." The project would result in a temporary significant impact to an existing landform during construction, Landscaping of proposed manufactured slopes is proposed; over time, this would help to mask the effects of the creation of new bare terrain and would help soften the introduction of new terrain into the existing landscape. The proposed development includes a mix of building designs that utilize compatible architectural styles, colors, building heights, lot sizes, setbacks, landscaping, and	The project would be consistent with this objective.

Table 5.1-4
Project's Consistency with Scripps Miramar Ranch Community Plan

Objective/Guideline	Goal/Recommendation	Analysis	Project Consistency
		street furniture harmonious to the existing community appearance. The architectural style of the residential buildings would be consistent throughout the project site to create a harmonious community.	

Notes: PRD = Planned Residential Development; MHPA = Multi-Habitat Planning Area; CALGreen = California Green Building Standards Code.

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SOURCE: SANGIS 2017

0 250 500 Feet

FIGURE 5.1-1

Surrounding Land Uses

EIR for the Renzulli Estates Project, City of San Diego, California

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5.2 TRANSPORTATION

This section describes the existing transportation conditions of the proposed Renzulli Estates Project (project) site, identifies associated regulatory requirements, evaluates potential significant impacts and identifies mitigation measures, if applicable, related to implementation of the project. The following discussion is based on the Vehicle Miles Traveled (VMT) Analysis (Appendix B1) prepared by Linscott Law & Greenspan (April 2024), and the Local Mobility Analysis (Appendix B2) also prepared by Linscott Law & Greenspan (April 2024).

5.2.1 EXISTING CONDITIONS

Existing Physical Conditions

Currently, the project site is primarily undeveloped, except for an existing large residence, several outbuildings, and two associated sheds. In addition, in the center of the site is a cleared area that has been paved. The project site is surrounded by existing residential development to the north, east, and west; small patches of undeveloped open space to the south and southeast; and Cypress Canyon Park further east. Cypress Canyon Road currently ends at the project site.

Existing Street Network

Scripps Poway Parkway

Scripps Poway Parkway is classified as a Six-Lane Prime Arterial west of Spring Canyon Road and as a Six-Lane Major Arterial from Spring Canyon Road to the eastern planning area boundary in the Scripps Miramar Ranch Community Plan (Community Plan) (Scripps Miramar Ranch Planning Committee et al. 2018). It is currently built as a six-lane roadway separated by a raised center median west of Spring Canyon Road and as a four-lane roadway separated by a raised center median between Spring Canyon Road and Cypress Canyon Road. The posted speed limit is 45–50 mph and parking is prohibited within the area surrounding the project site.

West of Spring Canyon Road, contiguous sidewalks are provided on both sides of the street. Between Spring Canyon Road and Cypress Canyon Road, a non-contiguous sidewalk is provided on the north side of the street and a contiguous sidewalk is provided on the south side of the street. East of Cypress Canyon Road, a non-contiguous sidewalk is provided on both sides of the street. Class II bike lanes are provided on both sides of the street. Class II bike lanes provide a restricted right-of-way (ROW) and are designated for the use of bicycles with a striped lane on a street or highway.

Spring Canyon Road

Spring Canyon Road is classified as a Four-Lane Collector west of Pomerado Road in the Community Plan (Scripps Miramar Ranch Planning Committee et al. 2018). It is currently built as a four-lane roadway separated by a painted median between Scripps Ranch Boulevard and Pomerado Road with intermittent turn pockets. The posted speed limit is 45 mph and parking is prohibited within the area surrounding the project site. Class II bike lanes and contiguous sidewalks are provided on both sides of the street.

Pomerado Road

Pomerado Road is classified as a Four-Lane Major Arterial between Spring Canyon Road and Stonebridge Parkway in the Community Plan (Scripps Miramar Ranch Planning Committee et al. 2018). It is currently built as a four-lane major roadway separated by a raised median. The posted speed limit is 45 mph and parking is prohibited within the area surrounding the project site. Class II bike lanes and contiguous sidewalks are provided on both sides of the street.

Cypress Canyon Road

Cypress Canyon Road is classified as a Four-Lane Collector between Scripps Poway Parkway and Blue Cypress Drive and as a Two-Lane Collector east of Blue Cypress Drive in the Miramar Ranch North Community Plan (City of San Diego Planning Dept 2016). It is currently built as a three- to four-lane roadway separated by a painted two-way left-turn lane between Scripps Poway Parkway and Alderhill Terrace and as a two-lane roadway between Alderhill Terrace and Angelique Street. The posted speed limit is 25–40 mph and parking is intermittently permitted within the area surrounding the project site. Class II bike lanes are provided on both sides of the street between Scripps Poway Parkway and Blue Cypress Drive. Contiguous sidewalks are provided on both sides of the street within the area surrounding the project site.

Cypress Canyon Park Drive

Cypress Canyon Park Drive is classified as a Two-Lane Residential Collector in the Community Plan (Scripps Miramar Ranch Planning Committee et al. 2018). It is currently built as a two-lane roadway. The posted speed limit is 25 mph. Parking is intermittently permitted within the area surrounding the project site, but prohibited on the east side of Cypress Canyon Park Drive, north of Spring Canyon Road for approximately 1,500 feet. Contiguous sidewalks are provided on both sides of the

street within the area surrounding the project site. The curb-to-curb width of Cypress Canyon Park Drive is approximately 40 feet.

Angelique Street

Angelique Street is an unclassified local street in the Community Plan (Scripps Miramar Ranch Planning Committee et al. 2018). It is currently built as a two-lane roadway. The posted speed limit is 25 mph and parking is permitted on both sides of the street within the area surrounding the project site. Contiguous sidewalks are provided on both sides of the street within the area surrounding the project site. The curb-to-curb width of Angelique Street is approximately 40 feet.

Existing Pedestrian Conditions

A pedestrian network inventory was conducted along street segments, which included documenting missing sidewalks, pedestrian barriers, and pedestrian pathways within 0.5 miles walking distance of the project. Existing pedestrian counts were conducted on Thursday, August 6, 2020, at every intersection in the study area for the pedestrian network inventory during the commuter AM/PM peak hours. Appendix B2 shows the existing pedestrian counts within the project study area.

A walkshed analysis was performed to evaluate the pedestrian connectivity in the vicinity of the project site and to ensure the project provides the appropriate pedestrian facilities. The walkshed analysis was performed by identifying all access points to and from the project considering topography constraints. From each access point, areas outside the project site that could be reached by walking 0.5 miles were identified. Selected walking routes from each access point were mapped considering sidewalks, crosswalks, and pedestrian routes, while some areas located within the 0.5-mile radius around the project site may not be accessible by walking due to lack of facilities. After creating the walkshed network, the area that could be captured by walking was measured. A larger walkshed area (walkshed network) means higher connectivity between the project site and nearby areas.

Existing Bicycle Conditions

A detailed bicycle network inventory was conducted for the area surrounding the project site. Existing bicycle counts were conducted on Thursday, August 6, 2020, at every intersection in the study area during the commuter AM/PM peak hours.

A bike shed analysis was conducted to evaluate bicycle connectivity in the vicinity of the project site. This analysis also identifies potential locations where providing bicycle access could improve project connectivity to the surrounding area. The bike shed analysis was performed by identifying all access points to and from the project. From each access point, areas outside the project site that could be reached by biking 0.5 miles were identified. Selected biking routes from each access point were

mapped considering the presence of bike routes, lanes, and dedicated pathways, while some areas that are within the 0.5-mile buffer around the project site may not be reached by bike due to lack of facilities. A larger bike shed area (bike shed network) means higher connectivity between the project site and nearby areas.

There are six Class II Bike Lanes within 0.5 miles of the project site. Scripps Poway Parkway, Pomerado Road, and Cypress Canyon Road have Class II bike lanes on both sides of the street. Additionally, Stonebridge Parkway, Spring Canyon Road, and Semillon Boulevard have buffered Class II bike lanes on both sides of the street. Class II bike lanes provide a restricted ROW and are designated for the use of bicycles with a striped lane on a street or highway. Class II bike lanes are at least 5 feet wide and should be buffered.

Existing Transit Mobility

Per Appendix B2, there are no transit stops within a 0.5-mile walking distance of any of the pedestrian access points of the project. The closest transit stop is located approximately 2.5 miles away from the site, at the intersection of Poway Road and Springbrook Drive, which serves Metropolitan Transit System Route 944. Route 944 runs between Sabre Springs/Peñasquitos Transit Station and Hilleary Place in Poway.

5.2.2 REGULATORY FRAMEWORK

State

California Department of Transportation

The California Department of Transportation is the public agency responsible for designing, building, operating, and maintaining California's state highway system, which consists of freeways, highways, expressways, and toll roads. The California Department of Transportation is also responsible for permitting and regulating the use of state roadways.

Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law changing the way transportation impact analysis is conducted under the California Environmental Quality Act (CEQA). Within the CEQA Guidelines, these changes include elimination of automobile delay, level of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. In December 2018, new CEQA Guidelines implementing SB 743 (Section 15064.3), along with the Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts for CEQA, were finalized and made effective. Guidelines Section

15064.3, and the associated Office of Planning and Research Technical Advisory, provide that use of automobile VMT is the preferred CEQA transportation metric and correspondingly eliminate auto delay/level of service as the metric for assessing significant impacts under CEQA statewide (OPR 2018). Under Section 15064.3, statewide application of the new VMT metric was required beginning on July 1, 2020.

Local

General Plan

The Mobility Element (City of San Diego 2015) of the City of San Diego (City) General Plan defines policies regarding traffic flow and transportation facility design. The purpose of the Mobility Element is "to improve mobility through development of a balanced, multi-modal transportation network" (City of San Diego 2015). The main goals of the Mobility Element pertain to walkable communities, transit first, street and freeway systems, intelligent transportation systems, transportation demand management, bicycling, parking management, airports, passenger rail, goods movement/freight, and regional transportation coordination and financing. The Mobility Element contains policies that help make walking more viable for short trips, in addition to addressing various other transportation choices in a manner that strengthens the City of Villages land use visions and helps to achieve a sustainable environment.

Scripps Miramar Ranch Community Plan

The Community Plan sets forth objectives and proposals to guide future development within Scripps Miramar Ranch. The Transportation Element of the Community Plan aims to provide an efficient and aesthetically pleasing transportation system for vehicular, bicycle, equestrian, and pedestrian traffic within the community and to the greater metropolitan area (Scripps Miramar Ranch Planning Committee et al. 2018).

City of San Diego Bicycle Master Plan

The 2013 City of San Diego Bicycle Master Plan, which updates the City's 2002 plan, presents a bicycle network, projects, policies, and programs for improving bicycling through 2030 and beyond, consistent with the City's 2008 General Plan mobility, sustainability, health, economic, and social goals. The goals of the Bicycle Master Plan are to create a city where bicycling is a viable travel choice, particularly for trips of less than five miles; a safe and comprehensive local and regional bikeway network; and environmental quality, public health, recreation and mobility benefits through increased bicycling. These goals are supported by 12 key policies to help bicycling become a more viable transportation mode for trips of less than 5 miles, to connect to transit, and for recreation (City of San Diego 2013).

The Bicycle Master Plan addresses existing bicycling conditions, the relationship of the plan to other plans and policies, a bicycle needs analysis, bicycle facility recommendations, bicycle program recommendations, and implementation and funding issues (City of San Diego 2013).

City of San Diego Pedestrian Master Plan

The City has developed a Pedestrian Master Plan to guide the planning and implementation of pedestrian improvement projects in the City (City of San Diego 2022a). The Master Plan will help the City enhance neighborhood quality and mobility options by facilitating pedestrian improvement projects and will identify and prioritize improvement projects based on technical analysis and community input, as well as improve the City's ability to receive grant funding for implementation of pedestrian projects.

During Phase 1, the City developed the Master Plan Citywide Framework Report, which provides a foundation for identifying and prioritizing projects in each community. Phases 2 and 3 inventoried seven communities in the City to understand pedestrian needs, identify problems, and create a prioritized list of pedestrian projects specific to each community. Phase 4 of the Pedestrian Master Plan created pedestrian plans for an additional seven communities, including College, Kensington-Talmadge, Midway-Pacific Highway, Old Town, Ocean Beach, Pacific Beach, and San Ysidro. Phase 4 began in mid-2011 and was completed in December 2013 (City of San Diego 2022a).

City of San Diego Transportation Study Manual

The City prepared guidelines for VMT analysis in compliance with SB 743—these guidelines are contained in the City's Transportation Study Manual (TSM) (current version dated September 2022). The City's guidelines are consistent with the Office of Planning and Research Technical Advisory.

In addition, the City has developed regulations for requiring land development projects to incorporate VMT reducing measures into projects or pay an active transportation in-lieu fee depending upon a project's location within the City. These regulations are contained in the Complete Communities: Mobility Choices Program (SCH No. 2019060003). The intention is that compliance with these regulations would be used as mitigation to the extent feasible per the findings and statement of overriding considerations of the Final Program Environmental Impact Report (EIR) for Complete Communities: Housing Solutions and Mobility Choices. The Final Program EIR for Complete Communities: Housing Solutions and Mobility Choices and the associated findings and statement of overriding considerations are incorporated by reference. The Program EIR concluded that the program would reduce citywide VMT, but since the timing and specific location of improvements were not known, the Complete Communities: Mobility Choices Program would have a significant and unavoidable transportation VMT impact. The Complete Communities: Mobility Choices Program was approved by City Council on November 9, 2020 (City of San Diego 2020).

5.2.3 IMPACTS ANALYSIS

5.2.3.1 Issue 1: Conflict with an Adopted Program, Plan, Ordinance, or Policy Addressing the Transportation System

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

Thresholds

According to the City's Significance Determination Thresholds (City of San Diego 2022b), the following should be used to determine the significance of a project, plan, or policy's transportation impact:

- City of San Diego Transportation Study Manual

Impact Analysis

As described in Section 5.1, Land Use, the project has demonstrated consistency with the City's General Plan and Community Plan related transportation goals and policies (see Tables 5.1-3 and 5.1-4).

Further, the City requires that project improvements be considered at transportation facilities with poor operations with the addition of project traffic.

Access and Circulation

Transportation (Roadway) Analysis

Vehicular access to the site would be provided via Cypress Canyon Road. The project would include construction of the connection of Cypress Canyon Road, between Angelique Street and Cypress Canyon Park Drive, consistent with the Community Plan. More specifically, Cypress Canyon Road would be extended southeast from its intersection with Angelique Street, located to the northwest of the site (Cypress Canyon Road—North), and northwest from Cypress Canyon Park Drive to the southeast of the site (Cypress Canyon Road—South). An additional roadway, Street "B," is proposed perpendicular to the Cypress Canyon Road—South extension to the northeast. Street "A" would extend from the Cypress Canyon Road—North extension to the east until it reaches Cypress Canyon Road—South. The project would downgrade this proposed segment of Cypress Canyon Road that crosses the project site from a two-lane collector to a two-lane sub-collector. Per the City's Street Design Manual (City of San Diego 2017), a two-lane sub-collector street has a design average daily traffic of 2,200 and allows for single-family homes with front yards fronting the street. As stated in

Appendix B2, the Cypress Canyon Road connection is forecasted to have fewer than 2,200 average daily trips. The proposed Cypress Canyon Road connection would also provide bicycle access and access for emergency service providers through the project site from both the eastern and western access points on Cypress Canyon Road.

In addition, the project proposes to install two chokers along Cypress Canyon Road, one east of the intersection of Cypress Canyon Road and Angelique Street and one near the eastern property boundary (see Figure 3-1, Site Plan), as traffic calming features. The project also includes a ROW vacation. This applies to a portion of the Lakehurst Avenue ROW located within the Multi-Habitat Planning Area Boundary Line Adjustment addition site. This portion of Lakehurst Avenue has not been constructed and currently ends at the intersection of Pocahontas Avenue. The ROW vacation would not result in conflict with related transportation goals and policies.

As described in Section 3.3.8, the project proposes a deviation from San Diego Municipal Code (SDMC) Section 142.0560(j)(1), Table 42-05N. Per SDMC Section 142.0560(j)(1), Table 42-05N, the minimum required and maximum allowed driveway width (outside a Parking Impact Overlay Zone) for a detached single dwelling unit (lot width of 50 feet or less) are 12-feet and 20-feet, respectively. Additionally, per SDMC Section 142.0560(j)(1), Table 142-05M, for a detached single dwelling unit (lot width greater than 50 feet), the minimum required and maximum allowed driveway widths are 12 feet and 25 feet, respectively. However, per standard drawing SDG-164, which is referred to in SDMC Section 142.0560(j)(3), curb openings shall not exceed 40% of the property frontage. Although the proposed 16-foot-wide driveway falls within the driveway width allowed, a deviation is requested due to the proposed 22-foot-wide (16-foot driveway plus 3-foot flare on each side) curb opening exceeding the 40% max frontage for a curb opening of any lot less than 55 feet wide, which is the width of 91 of the 100 total single-family residential lots in this subdivision. As demonstrated in Table 5.1-3, the project would not conflict with any Mobility Element policies. More specifically, while the project would increase the width of driveways within the project site, the requested deviation increasing the width of the driveways would not result in the inability of pedestrians to use the proposed sidewalks. This deviation would not result in inconsistency with transportation policies or goals.

Pedestrian/Bicycle/Transit Analysis

The Cypress Canyon Road connection through the project would include non-contiguous sidewalks that would provide pedestrian connectivity through the project site and to Cypress Canyon Park for residents west of the project site. The project also proposes a sidewalk connection on the north side of Cypress Canyon Road at the southeast terminus of the project site to connect to the existing sidewalk. As analyzed in Appendix B2, a review of the City's Systemic Safety Hot Spot map was conducted. Based on a review of the map and an evaluation of the intersection footprints found in Appendix C of the City's Systemic Safety, The Data-Driven Path to Vision Zero Report (April 2019), the

following study area intersections were identified as pedestrian and bicycle "hot spots" necessitating further evaluation:

- Scripps Poway Parkway/Angelique Street
- Pomerado Road/Spring Canyon Road

However, as a part of the recent Scripps Poway Parkway Pavement Repair Project, the Scripps Poway Parkway and Angelique Street intersection has been recently improved with the installation of high visibility crosswalks and Americans with Disabilities Act (ADA) compliant curb ramps at all the intersection legs. Additionally, loop detectors for vehicles and bikes are already installed at the Scripps Poway Parkway and Angelique Street intersection. Therefore, no additional project improvements are proposed at this intersection.

The Pomerado Road and Spring Canyon Road intersection has existing high visibility crosswalks at all legs except the north leg and ADA-compliant curb ramps exist at all corners except the northeast corner of the intersection. Loop detectors for vehicles and bikes are already installed at the intersection. The project would obtain a public improvement permit and install a high visibility crosswalk at the north leg and an ADA curb ramp with truncated domes at the northeast corner of the intersection per current City standards, as well as pedestrian countdown timers at all intersection legs with pedestrian crossings. The project would construct the connection of Cypress Canyon Road between Angelique Street and Cypress Canyon Park Drive, which would provide bicycle connectivity consistent with the proposed Class III Bike Route outlined in the Community Plan. Therefore, the project would not conflict with a program, plan ordinance, or policy addressing bicycle facilities.

Lastly, as discussed in Section 5.2.1, there are no transit stops within a 0.5-mile walking distance of any of the pedestrian access points of the project. The closest transit stop is approximately 2.5 miles away from the site, at the intersection of Poway Road and Springbrook Drive, which serves Metropolitan Transit System Route 944, which runs between Sabre Springs/Peñasquitos Transit Station and Hilleary Place in Poway. Thus, the project would not conflict with a program, plan ordinance, or policy addressing transit facilities.

Significance of Impact

The project would not conflict with adopted policies, plans, or programs addressing the transportation system. Impacts would be less than significant.

Mitigation Measures

As less-than-significant impacts would occur, no mitigation would be required.

5.2.3.2 Issue 2: VMT

Issue 2: Would the project or plan/policy result in VMT exceeding thresholds identified in the City of San Diego Transportation Study Manual?

Thresholds

The methodology and significance criteria for determining VMT transportation impacts in the City is contained in the City's TSM (current version dated September 2022). The TSM (City of San Diego 2022c) outlines the following process for performing analysis:

1. Determine if VMT analysis is necessary by comparing project characteristics to the City's screening criteria.
2. If the project does not meet any of the screening criteria, perform VMT analysis to determine the project's VMT.
3. Compare the project's VMT to the significance criteria to determine if there would be a VMT transportation impact.
4. If there would be an impact, identify mitigation measures to reduce the project impact (through compliance with the City's Complete Communities: Mobility Choices Program, compliance with the Climate Action Plan consistency checklist measures, and/or other measures).

The City has established the following significance threshold for VMT transportation impacts for residential projects:

- TSM Table 3 indicates that the threshold for determining a significant transportation VMT impact is 15% below the regional mean (also referred to as average) resident VMT per capita. Per TSM Table 3, "The regional mean and total regional VMT are determined using the San Diego Association of Governments (SANDAG) Regional Travel Demand Model. The specific model version and model year will be identified by the Development Services Department's (DSD) Transportation Development Section."

Impact Analysis

Project VMT Screening Assessment

The first step in analyzing transportation VMT impacts is to review the SANDAG VMT per capita location-based screening map and to compare the project characteristics to the City's screening criteria to determine if VMT analysis is necessary. A project that meets at least one of the following screening criteria would be presumed to have a less-than-significant VMT impact due to project characteristics and/or location. Table 5.2-1 outlines the City's screening criteria used to determine if

a detailed VMT analysis is necessary and explains whether or not the project is screened out using these criteria.

Table 5.2-1
VMT Screening Analysis Criteria

Screening Criteria	Analysis	Is the Project Screened?
Residential or Commercial Project Located in a VMT Efficient Area	The project is a residential or commercial employment project located in a VMT efficient area (15% or more below the base year average household VMT per capita or VMT per employee) based on the applicable location-based screening map produced by SANDAG.	No – the project is not located within a VMT-efficient area per SANDAG (Series 14 ABM 2+ Base Year 2016) SB 743 VMT Maps.
Small Project	The project is a small project defined as generating less than 300 daily unadjusted driveway trips using the City of San Diego trip generation rates/procedures.	Not applicable – the project generates more than 300 daily trips
Affordable Housing	The project has access to transit and is wholly or has a portion that meets one of the following criteria: is affordable to persons with a household income equal to or less than 50% of the area median income (as defined by California Health and Safety Code Section 50093), housing for senior citizens [as defined in Section 143.0720(e)], housing for transitional foster youth, disabled veterans, or homeless persons [as defined in 143.0720(f)]. The units shall remain deed restricted for a period of at least 55 years. The project shall provide no more than the minimum amount of parking per unit, per SDMC Section 143.0744. Only the portion of the project that meets the above criteria is screened out. For example, if the project is 100 units with ten deed-restricted affordable housing units, transportation VMT analysis would not be necessary for the ten affordable units but would be necessary for the remaining 90 units (unless they meet one of the other screening criteria). For purposes of applying the small project screening criteria, the applicant would only include the trip generation for the non-affordable housing portion of the project	No – the project proposes 12 affordable units. Because the project is not located within 0.5 miles of transit and the affordable housing units would be provided at 60% of AMI, the project's affordable units do not screen out.

Table 5.2-1
VMT Screening Analysis Criteria

Screening Criteria	Analysis	Is the Project Screened?
	(since the affordable housing portion is screened out).	
Redevelopment Project	The project is a redevelopment project that demonstrates that the proposed project's total project VMT is less than the existing land use's total VMT. Exception: If a project replaces affordable housing (either deed restricted or other types of affordable housing) with a smaller number of moderate-income or high-income residential units, the project is not screened out and must analyze VMT impacts per Table 3 of the TSM.	Not applicable – the project VMT would be significantly more than VMT generated by existing use.
Industrial Project Located in a VMT Efficient Area	The project is an industrial employment project located in VMT efficient area (in an area with average or below average base year VMT/employee) based on the applicable location-based screening map produced by SANDAG.	Not applicable – the project is not industrial
Locally Serving Retail/ Recreational Project	The project is a locally serving retail/recreational project defined as having 100,000 square feet gross floor area or less and demonstrates through a market area study that the market capture area for the project is approximately three miles (or less) and serves a population of roughly 25,000 people or less. Locally serving retail is consistent with the definitions of Neighborhood Shopping Center in the SDMC Land Development Code Trip Generation Manual. Locally serving recreation is consistent with the land uses listed in Appendix B of the TSM, given that it meets the square footage and market capture area above. Adding retail/recreation square footage (even if it is 100,000 square feet gross floor area or less) to an existing regional retail shopping area is not screened out.	Not applicable – the project is not retail or recreational

Note: VMT = vehicle miles traveled; SANDAG = San Diego Association of Governments; SB = Senate Bill; SDMC = San Diego Municipal Code; AMI = Area Median Income; TSM = Transportation Study Manual.

As shown in Table 5.2-1, the residential project does not meet the City's VMT screening criteria. The project does not meet the VMT efficient area screening criteria, as the project is located in Census Tract 170.44 with a VMT per resident of 23.4 (Series 14 ABM 2+ Base Year 2016), which is 123.4% of the regional average (23.4 compared to the regional average VMT per resident of 18.9), thus exceeding the significance threshold of 85% of the regional average VMT/capita. The project would generate more than 300 trips and would not qualify for the small project screening criteria. Although the project includes 12 affordable dwelling units, the project is not located within 0.5 miles of a transit facility; therefore, the project's affordable units do not meet the affordable housing VMT screening criteria. The project is a redevelopment project; however, it would generate more VMT than current uses and would not meet the requirements for the redevelopment project screening criteria. Finally, the project is not industrial, retail, or recreational in nature and would not meet the industrial project located in a VMT efficient area or the locally serving retail/recreational project screening criteria. For these reasons, a detailed VMT analysis of the project is required.

Project VMT Assessment

As described in Appendix B1, the project would generate approximately 1,096 average daily trips. Per the City's TSM, for projects that the generate less than 2,400 daily unadjusted trips, the project's VMT per resident would be the same as the VMT per resident of the census tract in which it is located. Therefore, using the current SANDAG SB 743 VMT Map (Series 14 ABM 2+ Base Year 2016), the project is located in Census Tract 170.44, which has a VMT per resident of 123.4% of the regional average (23.4 compared to the regional average VMT per resident of 18.9), which is above the City's 85% resident VMT per capita significance threshold.

Significance of Impact

The proposed residential project would result in a VMT per capita of 123.4% of the regional mean, which is above the City's 85% VMT per resident significance threshold. Therefore, the project's VMT impact would be significant.

Mitigation Measures

The project would mitigate its significant VMT impact through compliance with the Mobility Choices Regulations and rely upon on the findings and statement of overriding considerations from the Final Program EIR for Complete Communities: Housing Solutions and Mobility Choices as mitigation to the extent feasible . Considering the project is located within Mobility Zone 4, the project would be required to provide payment of the active transportation in-lieu fee towards mobility improvements in accordance with the Mobility Choices Regulations.

MM-TRA-1: Prior to final inspection of any buildings, the Owner/Permittee shall pay the required Active Transportation In-Lieu Fee in accordance with the Mobility Choices Regulations (San Diego Municipal Code Chapter 14, Article 3, Division 11), Appendix T Mobility Choices Regulations: Implementation Guidelines, which is required of projects located within Mobility Zone 4 under the Complete Communities: Mobility Choices program and ordinance.

Significance After Mitigation

Even with the implementation of MM-TRA-1 that would contribute to future improvements to reduce VMT, there is uncertainty whether the improvements would be implemented at the time a future development project's VMT impacts could occur and whether those impacts would be mitigated to a less-than-significant level. As identified in the findings and statement of overriding considerations from the Final Program EIR for Complete Communities: Housing Solutions and Mobility Choices (City of San Diego 2020), VMT impacts would remain significant and not fully mitigated with the payment of the active transportation in-lieu fee.

5.2.3.3 Issue 3: Hazards Due to a Design Feature

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

Thresholds

According to the City's Significance Determination Thresholds (City of San Diego 2022b), a project is considered to have a significant impact if a project would:

- Increase traffic hazards to motor vehicles, bicyclists or pedestrians due to proposed non-standard design features (e.g., poor sight distance, proposed driveway onto an access-restricted roadway).

Impact Analysis

The project does not include any project elements that could potentially create a traffic hazard for motor vehicles, bicycles, or pedestrians due to a proposed non-standard design feature. The proposed project's circulation system is designed to interconnect with the existing adjacent public street system and discourage cut-through automobile traffic. Additionally, the proposed connection of Cypress Canyon Road, between Angelique Street and Cypress Canyon Park Drive, would be designed in accordance with the City's Street Design Manual.

Currently Lakehurst Avenue ends at its intersection with Pocahontas Avenue. The Lakehurst Avenue ROW extends past Pocahontas Avenue into an urban canyon that is undeveloped. The proposed partial vacation of the Lakehurst Avenue ROW would not result in a hazard for vehicles, as the current termini is a three-legged intersection with a side-stop control at Lakehurst Avenue. The proposed vacation of Lakehurst Avenue would not result in any new vehicular trips or change the existing configuration of the Lakehurst Avenue/Pocahontas Avenue intersection. Therefore, the proposed vacation would not result in an increase in traffic hazards due to non-standard design features.

Access points would not create a hazard for vehicles or people entering or exiting the site. A Systemic Safety Review was prepared as part of the Local Mobility Analysis (Appendix B2), which included a review of the City's Systemic Safety Hot Spot map. As part of this analysis, the project would install a high visibility crosswalk at the north leg (continental crosswalks exist at the south, east, and west legs) and an ADA curb ramp with truncated domes at the northeast corner of the intersection of Pomerado Road/Spring Canyon Road per current City standards. In addition, the project would install pedestrian countdown timers at all the intersection legs with pedestrian crossings with a traffic signal modification plan.

Deviations from the driveway width requirements would not result in a hazardous design. The 16-ft-wide driveways would allow a larger amount of total parking within the subdivision than strict adherence to the Land Development Code. Additionally, the project would not result in a hazardous roadway design or unsafe roadway configuration; place incompatible uses on existing roadways; or create or place curves, slopes, or walls that impede adequate sight distance on a roadway. Moreover, because the project would be required to comply with City standards for any public street road improvements, the proposed project would not significantly increase hazards due to design features or incompatible uses.

Significance of Impact

Impacts associated with an increase in hazards would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.2.3.4 Issue 4: Emergency Access

Issue 4: Would the project or plan/policy result in inadequate emergency access?

Thresholds

Based on the City's Significance Determination Thresholds (City of San Diego 2022b), a project would result in a significant impact if the project would:

- Result in inadequate emergency access.

Impact Analysis

As stated in Section 5.19, Wildfire, all access roads would be constructed in accordance with SDMC Sections 55.8701 and 55.8703, which outline the requirements for fire apparatus access roads and gates to ensure adequate emergency access within the project site. Since the required fire access roads throughout the area are designed to meet or exceed Chapter 5, Appendix D, of the California Fire Code, as amended in SDMC Article 11, Division 1, and San Diego Fire–Rescue Department Policy A-14-1, which call for adequate parking, turning radius, grade maximums, and roadside fuel modification zones, potential conflicts that could reduce the roadway efficiency are minimized, allowing for smoother evacuations. Additionally, the project is subject to review by the San Diego Fire-Rescue Department and the San Diego Police Department to ensure compliance with applicable safety standards. Thus, the proposed project would not result in inadequate emergency access.

Significance of Impact

Impacts associated with inadequate emergency access would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.3 AIR QUALITY AND ODOR

This section describes the existing air quality conditions of the proposed Renzulli Estates Project (project) site, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if applicable, related to the implementation of the project. The following discussion is based on the air quality technical report, prepared by Dudek (January 2025) and included as Appendix C.

5.3.1 EXISTING CONDITIONS

Existing Physical Conditions

The majority of the 40.56-acre project site is undeveloped, with some development present in the center of the site. The site is primarily characterized by undeveloped land and currently features a large existing residence, several outbuildings, and two associated structures. Surrounding land uses include residential development and Cypress Park to the east of the project site. Since the project site is currently vacant, no pollutants are currently being emitted. No cars are traveling to or from the site and the site is not being maintained.

Regional Setting

The project site is located within the San Diego Air Basin (SDAB) and is subject to the San Diego Air Pollution Control District (SDAPCD) guidelines and regulations. The SDAB is one of 15 air basins that geographically divide the State of California. The weather of the San Diego region, as in most of Southern California, is influenced by the Pacific Ocean and its semi-permanent high-pressure systems that result in dry, warm summers and mild, occasionally wet winters. The average temperature ranges (in °F) from the mid-40s to the high 90s. Most of the region's precipitation falls from November to April with infrequent (approximately 10%) precipitation during the summer. The average seasonal precipitation along the coast is approximately 10 inches; the amount increases with elevation as moist air is lifted over the mountains to the east.

The topography in the San Diego region varies greatly, from beaches on the west to mountains and desert on the east. Along with local meteorology, the topography influences the dispersal and movement of pollutants in the SDAB. The mountains to the east prohibit dispersal of pollutants in that direction and help trap them in inversion layers as described in the next section.

The interaction of ocean, land, and the Pacific High Pressure Zone maintains clear skies for much of the year and influences the direction of prevailing winds (westerly to northwesterly). Local terrain is often the dominant factor inland, and winds in inland mountainous areas tend to blow through the valleys during the day and down the hills and valleys at night.

Meteorological and Topographical Conditions

The SDAB lies in the southwest corner of California, makes up the entire San Diego region (covering approximately 4,260 square miles), and is an area of high air pollution potential. The SDAB experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, and/or Santa Ana winds.

The climate also drives the pollutant levels. The climate of San Diego is classified as Mediterranean, but it is incredibly diverse due to the topography. The climate is dominated by the Pacific High-pressure system that results in warm, dry summers and mild, wet winters. The Pacific High-pressure drives the prevailing winds in the SDAB. The winds tend to blow onshore during the daytime and offshore at night. In the fall months, the SDAB is often impacted by Santa Ana winds. These winds are the result of a high-pressure system over the Nevada–Utah region that overcomes the westerly wind pattern and forces hot, dry winds from the east to the Pacific Ocean (SDAPCD 2015). The winds blow the air basin's pollutants out to sea. However, a weak Santa Ana wind can transport air pollution from the South Coast Air Basin and greatly increase San Diego ozone (O_3) concentrations. A strong Santa Ana also primes the vegetation for firestorm conditions.

The SDAB experiences frequent temperature inversions. Subsidence inversions occur during the warmer months as descending air associated with the Pacific High Pressure Zone meets cool marine air. The boundary between the two layers of air creates a temperature inversion that traps pollutants. Another type of inversion, a radiation inversion, develops on winter nights when air near the ground cools by heat radiation and air aloft remains warm. The shallow inversion layer formed between these two air masses can also trap pollutants. As the pollutants become more concentrated in the atmosphere, photochemical reactions occur that produce O_3, commonly known as smog.

Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland, toward the mountains. During the fall and winter, air quality problems are created due to emissions of carbon monoxide (CO) and oxides of nitrogen (NO_x). CO concentrations are generally higher in the morning and late evening. In the morning, CO levels are elevated due to cold temperatures and the large number of motor vehicles traveling. Higher CO levels during the late evenings are a result of stagnant atmospheric conditions trapping CO in the area. Since CO is produced almost entirely from automobiles, the highest CO concentrations in the basin are associated with heavy traffic. Nitrogen dioxide (NO_2) levels are also generally higher during fall and winter days when O_3 concentrations are lower.

The local climate in the central part of the County of San Diego (County) is characterized as semi-arid with consistently mild, warmer temperatures throughout the year. The average summertime high temperature in the region is approximately 86°F. The average wintertime low temperature is approximately 39°F. Average precipitation in the local area is approximately 13.2 inches per year, with the bulk of precipitation falling between November and April (WRCC 2017).

Criteria Pollutants

Criteria pollutants are defined by state and federal law as a risk to the health and welfare of the general public. In general, air pollutants include the following compounds:

- O_3
- Reactive organic gases or volatile organic compounds (VOCs)
- CO
- NO_2
- Particulate matter less than or equal to 10 microns in diameter (PM_{10}) and particulate matter less than or equal to 2.5 microns in diameter ($PM_{2.5}$)
- Sulfur dioxide (SO_2)
- Lead
- Toxic air contaminants (TACs)

Odorous Compounds. Odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). The ability to detect odors varies considerably among the population and, overall, is quite subjective. People may have different reactions to the same odor. An odor that is offensive to one person may be perfectly acceptable to another (e.g., coffee roaster). An unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. In a phenomenon known as odor fatigue, a person can become desensitized to almost any odor, and recognition may only occur with an alteration in the intensity. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receptors.

***Sensitive Receptors*.** Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution include children, the elderly, athletes, and people with cardiovascular and chronic respiratory diseases. Facilities and structures where these air pollution-sensitive people live or spend considerable amounts of time are known as sensitive receptors. Land uses where air

pollution-sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing and retirement homes, hospitals, residential homes where medical patients reside, and residential communities (sensitive sites or sensitive land uses) (CARB 2005; City of San Diego 2022). The SDAPCD identifies sensitive receptors as those who are especially susceptible to adverse health effects from exposure to TACs, such as children, the elderly, and the ill. Sensitive receptors include schools (grades kindergarten through 12), daycare centers, nursing homes, retirement homes, health clinics, and hospitals within 2 kilometers of the facility (SDAPCD 2019). The closest sensitive receptors to the project are surrounding residences and Cypress Canyon Park to the east of the project site.

San Diego Air Basin Attainment Designation

Pursuant to the 1990 federal Clean Air Act (CAA) amendments, the U.S. Environmental Protection Agency (EPA) classifies air basins (or portions thereof) as in "attainment" or "nonattainment" for each criteria air pollutant, based on whether the National Ambient Air Quality Standards (NAAQS) have been achieved. Generally, if the recorded concentrations of a pollutant are lower than the standard, the area is classified as "attainment" for that pollutant. If an area exceeds the standard, the area is classified as "nonattainment" for that pollutant. If there are not enough data available to determine whether the standard is exceeded in an area, the area is designated as "unclassified" or "unclassifiable." The designation of "unclassifiable/attainment" means that the area meets the standard or is expected to be meet the standard despite a lack of monitoring data. Areas that achieve the standards after a nonattainment designation are redesignated as maintenance areas and must have approved maintenance plans to ensure continued attainment of the standards. The California Clean Air Act, like its federal counterpart, called for the designation of areas as "attainment" or "nonattainment," but based on California Ambient Air Quality Standards (CAAQS) rather than the NAAQS. Table 5.3-1 depicts the current attainment status of the SDAB with respect to the NAAQS and CAAQS.

Table 5.3-1
San Diego Air Basin Attainment Classification

Pollutant	Designation/Classification	
	Federal Standards	*State Standards*
Ozone (O_3) – 1 hour	Attainment	**Nonattainment**
O_3 – (8 hour)	**Nonattainment (moderate)**	**Nonattainment**
Nitrogen Dioxide (NO_2)	Unclassifiable/attainment	Attainment
Carbon Monoxide (CO)	Attainment (maintenance)	Attainment
Sulfur Dioxide (SO_2)	Unclassifiable/attainment	Attainment
Coarse Particulate Matter (PM_{10})	Unclassifiable/attainment	**Nonattainment**
Fine Particulate Matter ($PM_{2.5}$)	Unclassifiable/attainment	**Nonattainment**

Table 5.3-1
San Diego Air Basin Attainment Classification

Pollutant	Designation/Classification	
	Federal Standards	*State Standards*
Lead	Unclassifiable/attainment	Attainment
Hydrogen Sulfide	No federal standard	Attainment
Sulfates	No federal standard	Unclassified
Visibility-Reducing Particles	No federal standard	Unclassified
Vinyl Chloride	No federal standard	No designation

Sources: CARB 2022.
Notes: Attainment = meets the standards; Attainment/maintenance = achieve the standards after a nonattainment designation; Nonattainment = does not meet the standards; Unclassified or Unclassifiable = insufficient data to classify; Unclassifiable/attainment = meets the standard or is expected to be meet the standard despite a lack of monitoring data.
If nonattainment for federal standards, a clarifying classification will be provided indicating the severity of the nonattainment status.

In summary, the SDAB is designated as an attainment area for the 1997 8-hour O_3 NAAQS and as a nonattainment area for the 2008 8-hour O_3 NAAQS. The SDAB is designated as a nonattainment area for O_3, PM_{10}, and $PM_{2.5}$ CAAQS. The portion of the SDAB where the project would be located is designated as attainment or unclassifiable/unclassified for all other criteria pollutants under the NAAQS and CAAQS.

Local Ambient Air Quality

The California Air Resources Board (CARB), air districts, and other agencies monitor ambient air quality at approximately 250 air quality monitoring stations across the state. Local ambient air quality is monitored by SDAPCD. SDAPCD operates a network of ambient air monitoring stations throughout the County that measure ambient concentrations of pollutants and determine whether the ambient air quality meets the CAAQS and the NAAQS. The nearest SDAPCD-operated monitoring station to the project is the Kearny Villa Road monitoring station, which is located approximately 10 miles south of the project site. This Kearny Villa Road monitoring station was used to show the background ambient air quality for O_3, PM_{10}, $PM_{2.5}$, and NO_2 for the project site. The monitoring station located on First Street was the closest to the project that monitored CO and SO_2 (15 miles south of the project site). Table 5.3-2 presents the most recent background ambient air quality data and number of days exceeding the ambient air quality standards from 2021 through 2023.

Table 5.3-2
Local Ambient Air Quality Data

Averaging Time	Unit	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
				2021	*2022*	*2023*	*2021*	*2022*	*2023*
Ozone (O_3) – Kearny Villa Road									
Maximum 1-hour Concentration	ppm	State	0.09	0.095	0.095	0.091	1	1	0
Maximum 8-hour Concentration	ppm	State	0.070	0.072	0.083	0.080	2	2	3
		Federal	0.070	0.071	0.083	0.079	1	2	3
Nitrogen Dioxide (NO_2) – Kearny Villa Road									
Maximum 1-hour Concentration	ppm	State	0.18	0.059	0.051	0.038	0	0	0
		Federal	0.100	0.059	0.051	0.038	0	0	0
Annual Concentration	ppm	State	0.030	0.005	0.008	0.006	0	0	0
		Federal	0.053	0.005	0.008	0.006	0	0	0
Carbon Monoxide (CO) – First Street									
Maximum 1-hour Concentration	ppm	State	20	1.2	1.5	1.1	0	0	0
		Federal	35	1.2	1.5	1.1	0	0	0
Maximum 8-hour Concentration	ppm	State	9.0	1.1	1.1	0.9	0	0	0
		Federal	9	1.1	1.1	0.9	0	0	0
Sulfur Dioxide (SO_2) – First Street									
Maximum 1-hour Concentration	ppm	Federal	0.075	0.001	0.001	0.001	0	0	0
Maximum 24-hour Concentration	ppm	State	0.04	0.000	0.000	0.000	0	0	0
	ppm	Federal	0.140	0.000	0.000	0.000	0	0	0
Annual Concentration	ppm	Federal	0.030	0.000	0.000	0.000	0	0	0
Coarse Particulate Matter (PM_{10})[a] – Kearny Villa Road									
Maximum 24-hour Concentration	μg/m^3	State	50	N/A	N/A	55	0	0	0
		Federal	150	N/A	N/A	55	0	0	0
Annual Concentration	μg/m^3	State	20	N/A	N/A	22	0	0	0

Table 5.3-2
Local Ambient Air Quality Data

Averaging Time	Unit	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
				2021	*2022*	*2023*	*2021*	*2022*	*2023*
Fine Particulate Matter ($PM_{2.5}$)[a] – Kearny Villa Road									
Maximum 24-hour Concentration	μg/m³	Federal	35	20.9	13.9	24.5	0	0	0
Annual Concentration	μg/m³	State	12	7.6	6.8	7.0	0	0	0
		Federal	9.0	7.6	6.8	7.0	0	0	0

Sources: CARB 2024; SDAPCD 2022, 2023, 2024.
Notes: ppm = parts per million; μg/m³ = micrograms per cubic meter; N/A = not available.
Data taken from CARB iADAM (http://www.arb.ca.gov/adam) and Environmental Protection Agency AirData (http://www.epa.gov/airdata/) represent the highest concentrations experienced over a given year.
Daily exceedances for particulate matter are estimated days because PM_{10} and $PM_{2.5}$ are not monitored daily. All other criteria pollutants did not exceed federal or state standards during the years shown. There is no federal standard for 1-hour O_3, annual PM_{10}, or 24-hour SO_2, nor is there a state 24-hour standard for $PM_{2.5}$.
[a] Measurements of PM_{10} and $PM_{2.5}$ are usually collected every 6 days and every 1 to 3 days, respectively. Number of days exceeding the standards is a mathematical estimate of the number of days concentrations would have been greater than the level of the standard had each day been monitored.

5.3.2 REGULATORY FRAMEWORK

Federal

Federal Clean Air Act/National Ambient Air Quality Standards

The CAA, passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. EPA is responsible for implementing most aspects of the CAA, including the NAAQS for major air pollutants, hazardous air pollutant standards, approval of state attainment plans, motor vehicle emission standards, stationary source emission standards and permits, acid rain control measures, stratospheric O_3 protection, and enforcement provisions.

Under the CAA, NAAQS are established for the following criteria pollutants: O_3, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and lead. The NAAQS describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The CAA requires EPA to reassess the NAAQS at least every 5 years to determine whether adopted standards are adequate to protect public health based on

current scientific evidence. States with areas that exceed the NAAQS must prepare state implementation plans (SIPs) that demonstrate how those areas will attain the standards within mandated time frames.

National Emission Standards for Hazardous Air Pollutants

The 1977 federal CAA amendments required EPA to identify national emission standards for hazardous air pollutants to protect public health and welfare. Hazardous air pollutants include certain VOCs, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure to humans and other mammals. Under the 1990 CAA amendments, which expanded the control program for hazardous air pollutants, 189 substances and chemical families were identified as hazardous air pollutants.

State

California Clean Air Act/California Ambient Air Quality Standards

The federal CAA delegates the regulation of air pollution control and the enforcement of the NAAQS to the states. In California, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for ensuring the implementation of the California Clean Air Act of 1988, responding to the CAA and regulating emissions from motor vehicles and consumer products.

CARB has established CAAQS, which are generally more restrictive than the NAAQS. The CAAQS describe adverse conditions; that is, pollution levels must be below these standards before a basin can attain the standard. Air quality is considered in attainment if pollutant levels are continuously below the CAAQS and violate the standards no more than once each year. The CAAQS for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, PM_{10}, $PM_{2.5}$, and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. The NAAQS and CAAQS are presented in Table 5.3-3.

Table 5.3-3
Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	*Primary*[c,d]	*Secondary*[c,e]
O_3	1 hour	0.09 ppm (180 μg/m^3)	—	Same as Primary Standard[f]
	8 hours	0.070 ppm (137 μg/m^3)	0.070 ppm (137 μg/m^3)[f]	

Table 5.3-3
Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	*Primary*[c,d]	*Secondary*[c,e]
NO_2[g]	1 hour	0.18 ppm (339 μg/m^3)	0.100 ppm (188 μg/m^3)	Same as Primary Standard
	Annual Arithmetic Mean	0.030 ppm (57 μg/m^3)	0.053 ppm (100 μg/m^3)	
CO	1 hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	None
	8 hours	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	
SO_2[h]	1 hour	0.25 ppm (655 μg/m^3)	0.075 ppm (196 μg/m^3)	—
	3 hours	—	—	0.5 ppm (1,300 μg/m^3)
	24 hours	0.04 ppm (105 μg/m^3)	0.14 ppm (for certain areas)[g]	—
	Annual	—	0.030 ppm (for certain areas)[g]	—
PM_{10}[i]	24 hours	50 μg/m^3	150 μg/m^3	Same as Primary Standard
	Annual Arithmetic Mean	20 μg/m^3	—	
$PM_{2.5}$[i]	24 hours	—	35 μg/m^3	Same as Primary Standard
	Annual Arithmetic Mean	12 μg/m^3	9.0 μg/m^3	15.0 μg/m^3
Lead[j,k]	30-day Average	1.5 μg/m^3	—	—
	Calendar Quarter	—	1.5 μg/m^3 (for certain areas)[k]	Same as Primary Standard
	Rolling 3-Month Average	—	0.15 μg/m^3	
Hydrogen sulfide	1 hour	0.03 ppm (42 μg/m^3)	—	—
Vinyl chloride[j]	24 hours	0.01 ppm (26 μg/m^3)	—	—
Sulfates	24 hours	25 μg/m^3	—	—

Table 5.3-3
Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	*Primary*[c,d]	*Secondary*[c,e]
Visibility reducing particles	8 hour (10:00 a.m. to 6:00 p.m. PST)	Insufficient amount to produce an extinction coefficient of 0.23 per kilometer due to the number of particles when the relative humidity is less than 70%	—	—

Source: CARB 2016b; EPA 2024.

Notes: O_3 = ozone; ppm = parts per million by volume; μg/m^3 = micrograms per cubic meter; NO_2 = nitrogen dioxide; CO = carbon monoxide; mg/m^3= milligrams per cubic meter; SO_2 = sulfur dioxide; PM_{10} = particulate matter with an aerodynamic diameter less than or equal to 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns.

[a] California standards for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, suspended particulate matter (PM_{10}, $PM_{2.5}$), and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. California Ambient Air Quality Standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[b] National standards (other than O_3, NO_2, SO_2, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once per year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 μg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard.

[c] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based on a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[d] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

[e] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[f] On October 1, 2015, the national 8-hour O_3 primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[g] To attain the national 1-hour standard, the three-year average of the annual 98th percentile of the one-hour daily maximum concentrations at each site must not exceed 100 parts per billion (ppb). Note that the national 1-hour standard is in units of ppb. California standards are in units of ppm.

To directly compare the national 1-hour standard to the California standards, the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

[h] On June 2, 2010, a new 1-hour SO_2 standard was established, and the existing 24-hour and annual primary standards were revoked. To attain the national 1-hour standard, the three-year average of the annual 99th percentile of the one-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment of the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

[i] On February 7, 2024, the national annual $PM_{2.5}$ primary standard was lowered from 12 $\mu g/m^3$ to 9 $\mu g/m^3$. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 $\mu g/m^3$, as was the annual secondary standard of 15 $\mu g/m^3$. The existing 24-hour PM_{10} standards (primary and secondary) of 150 $\mu g/m^3$ were also retained. The form of the annual primary and secondary standards is the annual mean averaged over three years.

[j] California Air Resources Board has identified lead and vinyl chloride as toxic air contaminants with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[k] The national standard for lead was revised on October 15, 2008, to a rolling three-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

Toxic Air Contaminants

A TAC is defined by California law (Section 39655 of the California Health and Safety Code) as an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. Federal laws use the hazardous air pollutants to refer to the same types of compounds that are referred to as TACs under state law. California regulates TACs primarily through the Tanner Air Toxics Act (Assembly Bill [AB] 1807) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588).

AB 1807 sets forth a formal procedure for CARB to designate substances as TACs. This includes research, public participation, and scientific peer review before CARB can designate a substance as a TAC. Pursuant to AB 2588, existing facilities that emit air pollutants above specified levels were required to (1) prepare a TAC emission inventory plan and report; (2) prepare a risk assessment if TAC emissions were significant; (3) notify the public of significant risk levels; and (4) if health impacts were above specified levels, prepare and implement risk reduction measures.

The following regulatory measures pertain to the reduction of diesel particulate matter (DPM) and criteria pollutant emissions from off-road equipment and diesel-fueled vehicles.

Idling of Commercial Heavy-Duty Trucks (13 CCR 2485)

In July 2004, CARB adopted an Airborne Toxic Control Measure (ATCM) to control emissions from idling trucks. The ATCM prohibits idling for more than 5 minutes for all commercial trucks with a gross vehicle weight rating over 10,000 pounds. The ATCM contains an exception that allows trucks to idle while queuing or involved in operational activities.

In-Use Off-Road Diesel-Fueled Fleets (13 CCR 2449 et seq.)

In July 2007, CARB adopted an ATCM for in-use off-road diesel vehicles. This regulation requires that specific fleet average requirements are met for NO_x emissions and for particulate matter emissions. Where average requirements cannot be met, best available control technology requirements apply. The regulation also includes several recordkeeping and reporting requirements.

In response to AB 8 2X, the regulations were revised in July 2009 (effective December 3, 2009) to allow a partial postponement of the compliance schedule in 2011 and 2012 for existing fleets. On December 17, 2010, CARB adopted additional revisions to further delay the deadlines reflecting reductions in diesel emissions due to the poor economy and overestimates of diesel emissions in California. The revisions delayed the first compliance date until no earlier than January 1, 2014, for large fleets, with final compliance by January 1, 2023. The compliance dates for medium fleets were delayed until an initial date of January 1, 2017, and final compliance date of January 1, 2023. The compliance dates for small fleets were delayed until an initial date of January 1, 2019, and final compliance date of January 1, 2028. Correspondingly, the fleet average targets were made more stringent in future compliance years. The revisions also accelerated the phaseout of older equipment with newer equipment added to existing large and medium fleets over time, requiring the addition of Tier 2 or higher engines starting on March 1, 2011, with some exceptions; Tier 2 or higher engines on January 1, 2013, without exception; and Tier 3 or higher engines on January 1, 2018 (January 1, 2023, for small fleets).

On October 28, 2011 (effective December 14, 2011), the executive officer of CARB approved amendments to the regulation. The amendments included revisions to the applicability section and additions and revisions to the definition. The initial date for requiring the addition of Tier 2 or higher engines for large and medium fleets, with some exceptions, was revised to January 1, 2012. New provisions also allow for the removal of emission control devices for safety or visibility purposes. The regulation also was amended to combine the particulate matter and NO_x fleet average targets under one, instead of two, sections. The amended fleet average targets are based on the fleet's NO_x average, and the previous section regarding particulate matter performance requirements was deleted completely. The best available control technology requirements, if a fleet cannot comply with the fleet average requirements, were restructured and clarified.

On November 17, 2022, CARB approved amendments to the regulation aimed at further reducing emissions from the off-road sector. Other amendments to the regulations included minor administrative changes to the regulatory text.

In-Use On-Road Diesel-Fueled Vehicles (13 CCR 2025)

On December 12, 2008, CARB adopted an ATCM to reduce NO_x and particulate matter emissions from most in-use on-road diesel trucks and buses with a gross vehicle weight rating greater than 14,000 pounds. The original ATCM regulation required fleets of on-road trucks to limit their NO_x and particulate matter emissions through a combination of exhaust retrofit equipment and new vehicles. The regulation limited particulate matter emissions for most fleets by 2011 and limited NO_x emissions for most fleets by 2013. The regulation did not require any vehicle to be replaced before 2012 and never required all vehicles in a fleet be replaced.

In December 2009, the CARB Governing Board directed staff to evaluate amendments that would provide additional flexibility for fleets adversely affected by the struggling California economy. On December 17, 2010, CARB revised this ATCM to delay its implementation along with limited relaxation of its requirements. Starting on January 1, 2015, lighter trucks with a gross vehicle weight rating of 14,001 to 26,000 pounds with 20-year-old or older engines need to be replaced with newer trucks (2010 model year emissions equivalent as defined in the regulation). Trucks with a gross vehicle weight rating greater than 26,000 pounds with 1995 model year or older engines needed to be replaced as of January 1, 2015. Trucks with 1996 to 2006 model year engines must install a Level 3 (85% control) diesel particulate filter starting on January 1, 2012, to January 1, 2014, depending on the model year, and then must be replaced after 8 years. Trucks with 2007 to 2009 model year engines have no requirements until 2023, at which time they must be replaced with 2010 model year emissions-equivalent engines, as defined in the regulation. Trucks with 2010 model year engines would meet the final compliance requirements. The ATCM provides a phase-in option under which a fleet operator would equip a percentage of trucks in the fleet with diesel particulate filters, starting at 30% as of January 1, 2012, with 100% by January 1, 2016. Under each option, delayed compliance is granted to fleet operators who have or will comply with requirements before the required deadlines.

On September 19, 2011 (effective December 14, 2011), the executive officer of CARB approved amendments to the regulations, including revisions to the compliance schedule for vehicles with a gross vehicle weight rating of 26,000 pounds or less to clarify that all vehicles must be equipped with 2010 model year emissions equivalent engines by 2023. The amendments included revised and additional credits for fleets that downsize; implement early particulate matter retrofits; incorporate hybrid vehicles, alternative-fueled vehicles, and vehicles with heavy-duty pilot ignition engines; and implement early addition of newer vehicles. The amendments included provisions for additional

flexibility, such as for low-usage construction trucks, and revisions to previous exemptions, delays, and extensions. Other amendments to the regulations included minor administrative changes to the regulatory text, such as recordkeeping and reporting requirements related to other revisions.

California Health and Safety Code Section 41700

Section 41700 of the California Health and Safety Code states that a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. This section also applies to sources of objectionable odors.

Local

San Diego Air Pollution Control District

While CARB is responsible for the regulation of mobile emission sources within the state, local air quality management districts and air pollution control districts are responsible for enforcing standards and regulating stationary sources. The project site is located within the SDAB and is subject to the guidelines and regulations of the SDAPCD.

In the County, O_3 and particulate matter are the pollutants of main concern, since exceedances of CAAQS for those pollutants have been observed in most years. For this reason, the SDAB has been designated as a nonattainment area for the state PM_{10}, $PM_{2.5}$, and O_3 standards. The SDAB is also a federal O_3 attainment (maintenance) area for 1997 8-hour O_3 standard, an O_3 nonattainment area for the 2008 8-hour O_3 standard, and a CO maintenance area (western and central part of the SDAB only, including the project site).

Federal Attainment Plans

SDAPCD has prepared the 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (2020 Attainment Plan) that demonstrates how the region will further reduce air pollutant emissions to attain the current NAAQS for O_3. The 2020 Attainment Plan was approved by the SDAPCD on October 14, 2020. On November 19, 2020, CARB adopted the 2020 Attainment Plan for attaining the federal 8-hour 75 parts per billion and 70 parts per billion O_3 standards; CARB projects attainment for the standards by 2026 and 2032, respectively (SDAPCD 2020). The 2020 Attainment Plan will be submitted to EPA as a revision to the California SIP for attaining the O_3 NAAQS.

In December 2016, the SDAPCD adopted an update to the Eight-Hour Ozone Attainment Plan for San Diego County (2008 O_3 NAAQS), which indicated that local controls and state programs would allow the region to reach attainment of the federal 8-hour O_3 standard (1997 O_3 NAAQS) by 2018 (SDAPCD 2016a). In this plan, SDAPCD relied on the Regional Air Quality Strategy (RAQS) to demonstrate how the region would comply with the federal O_3 standard. The RAQS details how the region will manage and reduce O_3 precursors (NO_x and VOCs) by identifying measures and regulations intended to reduce these pollutants. The control measures identified in the RAQS generally focus on stationary sources; however, the emissions inventories and projections in the RAQS address all potential sources, including those under the authority of CARB and EPA. Incentive programs for reduction of emissions from heavy-duty diesel vehicles, off-road equipment, and school buses are also established in the RAQS.

Currently, the County is designated as moderate nonattainment for the 2008 NAAQS and maintenance for the 1997 NAAQS. As documented in the 2016 8-Hour Ozone Attainment Plan for San Diego County, the County has a likely chance of obtaining attainment due to the transition to low-emission cars, stricter new source review rules, and continuing the requirement of general conformity for military growth and the San Diego International Airport. The County will also continue emission control measures, including ongoing implementation of existing regulations in O_3 precursor reduction to stationary and area-wide sources, subsequent inspections of facilities and sources, and the adoption of laws requiring best available retrofit control technology for control of emissions (SDAPCD 2016a).

State Attainment Plans

The SDAPCD 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 SDAB. The RAQS for the SDAB was initially adopted in 1991 and is updated on a triennial basis, most recently in 2022 (SDAPCD 2022). Approved by the SDAPCD Board on October 14, 2020, and CARB on November 19, 2020, the plan was submitted by CARB on January 8, 2021, for EPA's consideration as a revision to the California SIP for attaining the O_3 standards. The RAQS outlines SDAPCD's plans and control measures designed to attain the state air quality standards for O_3. The RAQS relies on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County and the cities in the County, to forecast future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by the County and the cities in the County as part of the development of their general plans (SANDAG 2017a, 2017b).

Since 2007, the San Diego region has reduced daily VOC emissions and NO_x emissions by 3.9% and 7.0%, respectively; the SDAPCD expects to continue reductions through 2035 (SDAPCD 2016b). These reductions were achieved through implementation of six VOC control measures and three NO_x control measures adopted in the SDAPCD's 2009 RAQS (SDAPCD 2009a); in addition, the SDAPCD is considering additional measures, including three VOC measures and four control measures to reduce 0.3 daily tons of VOC and 1.2 daily tons of NO_x, provided they are found to be feasible region-wide. In addition, SDAPCD has implemented nine incentive-based programs, has worked with SANDAG to implement regional transportation control measures, and has reaffirmed the state emission offset repeal.

Regarding particulate matter emissions-reduction efforts, in December 2005, the SDAPCD prepared a report titled Measures to Reduce Particulate Matter in San Diego County to address implementation of Senate Bill 656 in the County (Senate Bill 656 required additional controls to reduce ambient concentrations of PM_{10} and $PM_{2.5}$) (SDAPCD 2005). In the report, SDAPCD evaluated implementation of source-control measures that would reduce particulate matter emissions associated with residential wood combustion; various construction activities including earthmoving, demolition, and grading; bulk material storage and handling; carry-out and track-out removal and cleanup methods; inactive disturbed land; disturbed open areas; unpaved parking lots/staging areas; unpaved roads; and windblown dust (SDAPCD 2005).

SDAPCD Rules and Regulations

As stated above, the SDAPCD is responsible for planning, implementing, and enforcing federal and state ambient standards in the SDAB. The following rules and regulations apply to all sources in the jurisdiction of SDAPCD and would apply to the proposed project.

SDAPCD Regulation II: Permits; Rule 20.2: New Source Review Non-Major Stationary Sources

This rule requires new or modified stationary source units (that are not major stationary sources) with the potential to emit 10 pounds per day or more of VOC, NO_x, SO_x, or PM_{10} to be equipped with best available control technology. For those units with a potential to emit above Air Quality Impact Assessments Trigger Levels, the units must demonstrate that such emissions would not violate or interfere with the attainment of any national air quality standard (SDAPCD 2016b).

The project does not propose specific stationary sources and the regulation is not applicable.

SDAPCD Regulation IV: Prohibitions; Rule 50: Visible Emissions

This rule prohibits discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than 3 minutes in any period of 60

consecutive minutes, which is darker in shade than that designated as Number 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or of such opacity as to obscure an observer's view to a degree greater than does smoke of a shade designated as Number 1 on the Ringelmann Chart (SDAPCD 1997).

Construction of the project may result in visible emissions, primarily during earth-disturbing activities, which would be subject to SDAPCD Rule 50.

SDAPCD Regulation IV: Prohibitions; Rule 51: Nuisance

This rule prohibits the discharge, from any source, of such quantities of air contaminants or other materials that cause or have a tendency to cause injury, detriment, nuisance, annoyance to people and/or the public, or damage to any business or property (SDAPCD 1969).

Any criteria air pollutant emissions, TAC emissions, or odors that would be generated during construction or operation of the project would be subject to SDAPCD Rule 51. Violations can be reported to the SDAPCD in the form of an air quality complaint by telephone, email, and online form. Complaints are investigated by the SDAPCD as soon as possible.

SDAPCD Regulation IV: Prohibitions; Rule 55: Fugitive Dust

This rule regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions, including active operations, open storage piles, and inactive disturbed areas, as well as track-out and carry-out onto paved roads beyond a project area (SDAPCD 2009b). Construction of a project, primarily during earth-disturbing activities, may result in fugitive dust emissions that would be subject to SDAPCD Rule 55.

SDAPCD Regulation IV: Prohibitions; Rule 67.0.1: Architectural Coatings

This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories (SDAPCD 2021). Construction and operation of the project would include application of architectural coatings (e.g., paint and other finishes), which are subject to SDAPCD Rule 67.0.1. Architectural coatings used in the reapplication of coatings during operation of the project would be subject to the VOC content limits identified in SDAPCD Rule 67.0.1, which applies to coatings manufactured, sold, or distributed within the County.

SDAPCD Regulation XII: Toxic Air Contaminants; Rule 1200: Toxic Air Contaminants - New Source Review

This rule requires new or modified stationary source units with the potential to emit TACs above rule threshold levels to either demonstrate that they will not increase the maximum incremental cancer

risk above one in 1 million at every receptor location, demonstrate that toxics best available control technology will be employed if maximum incremental cancer risk is equal to or less than 10 in 1 million, or demonstrate compliance with the SDAPCD's protocol for those sources with an increase in maximum incremental cancer risk at any receptor location of greater than 10 in 1 million but less than 100 in 1 million (SDAPCD 2024a).

The project does not currently include specific stationary sources that would generate TACs that are not commonly associated with residential development projects and the regulation is not applicable.

SDAPCD Regulation XII: Toxic Air Contaminants; Rule 1210: Toxic Air Contaminant Public Health Risks – Public Notification and Risk Reduction

This rule requires each stationary source required to prepare a public risk assessment to provide written public notice of risks at or above the following levels: maximum incremental cancer risks equal to or greater than 10 in 1 million, cancer burden equal to or greater than 1.0, total acute non-cancer health hazard index equal to or greater than 1.0, or total chronic non-cancer health hazard index equal to or greater than 1.0 (SDAPCD 2024b).

The project does not currently include specific stationary sources that would generate TACs and the regulation is not applicable.

San Diego Association of Governments

SANDAG is the regional planning agency for the County and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. SANDAG serves as the federally designated metropolitan planning organization for the County. With respect to air quality planning and other regional issues, SANDAG has prepared San Diego Forward: The Regional Plan (Regional Plan) for the San Diego region (SANDAG 2015). The Regional Plan combines the big-picture vision for how the region will grow over the next 35 years with an implementation program to help make that vision a reality. The Regional Plan, including its Sustainable Communities Strategy, is built on an integrated set of public policies, strategies, and investments to maintain, manage, and improve the transportation system so that it meets the diverse needs of the San Diego region through 2050.

Regarding air quality, the Regional Plan sets the policy context in which SANDAG participates, responds to the air district's air quality plans, and builds off the air district's air quality plan processes that are designed to meet health-based criteria pollutant standards in several ways (SANDAG 2015). First, it complements air quality plans by providing guidance and incentives for public agencies to consider best practices that support the technology-based control measures in air quality plans. Second, the Regional Plan emphasizes the need for better coordination of land use

and transportation planning, which heavily influences the emissions inventory from the transportation sectors of the economy. This also minimizes land use conflicts, such as residential development near freeways, industrial areas, or other sources of air pollution.

On December 10, 2021, SANDAG's Board of Directors adopted the final 2021 Regional Transportation Improvement Program, which is a multibillion dollar, multiyear program of proposed major transportation projects in the San Diego region. Transportation projects funded with federal, state, and TransNet (the San Diego transportation sales tax program) funds must be included in an approved Regional Transportation Improvement Program. Locally funded projects also may be programmed at the discretion of the agency. The 2021 Regional Transportation Improvement Program covers five fiscal years and incrementally implements the Regional Plan (SANDAG 2021).

City of San Diego Municipal Code

The San Diego Municipal Code addresses air quality and odor impacts at Chapter 14, Article 2, Division 7, paragraph 142.0710, Air Contaminant Regulations, which states that air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health, cause damage to vegetation or property, or cause soiling shall not be permitted to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located.

5.3.3 IMPACT ANALYSIS

5.3.3.1 Issue 1: Air Quality Plan

Issue 1: Would the project conflict with or obstruct the implementation of the applicable air quality plan?

Thresholds

According to the City of San Diego (City) Significance Determination Thresholds (City of San Diego 2022) and Appendix G of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.), air quality impacts would be significant if the project would:

- Conflict with or obstruct implementation of the applicable air quality plan.

Impact Analysis

The SDAPCD and SANDAG are responsible for developing and implementing the clean air plans for attainment and maintenance of the ambient air quality standards in the SDAB. Specifically, the SIP and RAQS. The federal O_3 maintenance plan, which is part of the SIP, was adopted in 2012. The most

recent O_3 attainment plan was adopted in 2020. The SIP includes a demonstration that current strategies and tactics will maintain acceptable air quality in the SDAB based on the NAAQS. The RAQS was initially adopted in 1991 and is updated on a triennial basis. As such, the RAQS was most recently updated in 2022. The RAQS outlines SDAPCD's plans and control measures designed to attain the state air quality standards for O_3. The SIP and RAQS rely on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County as a whole and the cities in the County, to project future emissions and determine the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by the County and the cities in the County as part of the development of their general plans.

If a project proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might be in conflict with the SIP and RAQS. The project site is currently zoned as Agricultural-Residential and is designated as Park, Open Space, and Recreation and Residential per the City's General Plan. The Scripps Miramar Ranch Community Plan (Community Plan) land use designation for the project site is Very Low Residential (3-5 dwelling units per net acre) and Open Space (Scripps Miramar Ranch Planning Committee et al. 2018). The Community Plan, Figure 7b "Area "E" Unit Allocation by Owner" identifies a maximum of 45 units on the project site. Under the permitted uses within the Agricultural-Residential zone, the site buildout forecast would be agricultural uses or low-density single dwelling unit homes with a minimum of 10 acre lots. Considering the site is 40.56 acres, the zoning would allow up to four single-family units. Overall, considering both land use and zoning, the maximum allowed buildout would be four single-family units under the existing conditions. The project includes a rezone and land use designation change to allow for the proposed 112 units. The rezone would change potential buildout through zoning by 108 units, increasing the maximum from 4 units to 112 units. The community plan amendment would change the maximum unit allocation in Figure 7b from 45 units to 112 units, increasing the identified community plan allowance by 67 units.

Every 4 years SANDAG works with local jurisdictions, the California State Department of Finance, demographic and economic experts, and stakeholders to create a long-term forecast that predicts what the region will look like in terms of population, housing units, and number of jobs. SANDAG's Series 15 Forecast, with a launch year of 2022 and look-to year 2050, was recently completed and is being used in the modeling and planning for the 2025 Regional Plan. The Series 15 Forecast estimates that the City would have 553,921 housing units in 2022 and 645,899 units in 2040 (SANDAG 2024). This would equate to an additional 5,110 units per year from 2022 to 2040.

The City is currently in urgent need for housing and is experiencing a housing shortage, as discussed in the City of San Diego General Plan Housing Element 2021–2029. The City's portion of the County's

regional housing needs assessment target for the 2021–2029 Housing Element period is 108,036 homes (City of San Diego 2020). While the City is planning for additional housing to meet the need and targeted to permit more than 88,000 new housing units between 2010 and 2020, less than half of those units were constructed (42,275) as of December 2019 (City of San Diego 2020). The land use designation and zoning would allow for a maximum of 4 units at the project site. Considering this, the proposed addition of 112 units be 108 units beyond that planned for the site. Regardless, the SANDAG growth forecast is not anticipated to result in a population increase considering there is a shortage of housing to accommodate the existing and planned population.

Although the project proposes a Community Plan Amendment that would increase the residential density of the site, the proposed housing would be growth accommodating. Thus, the project would not directly induce substantial unplanned population growth to the area. In addition, the proposed project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations.

Significance of Impact

The project would not conflict with SANDAG's regional growth forecast for the City, which accounts for residential growth in the City. Therefore, impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.3.3.2 Issues 2 and 3: Air Quality Standard or Cumulatively Considerable Net Increase of Any Criteria Pollutant

Issue 2: Would the project result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?

Issue 3: Would the project exceed 100 pounds per day of Particulate Matter (PM) dust?

Thresholds

To determine the significance of the project's emissions on the environment, the City's CEQA Significance Determination Thresholds (City of San Diego 2022) were used. Per the City's thresholds, the project would have a significant impact on air quality if the project would:

- Violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Additionally, the non-attainment status of regional pollutants is the result of past and present development. As such, the SDAPCD develops and implements plans for future attainment of ambient air quality standards. Based on the considerations of the SDAPCD, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a project's individual emissions would violate any air quality standard, contribute substantially to an existing or projected air quality violation, or have a cumulatively significant impact on air quality.

Impact Analysis

Construction

Construction of the project would result in the temporary addition of pollutants to the local airshed caused by sources located within the project site (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (worker vehicle trips). Construction emissions can vary substantially day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions. Criteria air pollutant emissions associated with construction activities were quantified using California Emissions Estimator Model (CalEEMod) Version 2022.1 (CAPCOA 2022).

As described in Chapter 3, Project Description, the project would result in the development of 100 single-family homes and 12 multifamily units on an approximately 40.56-acre project site within the community of Scripps Miramar Ranch. For the purposes of modeling, it was assumed that construction of the proposed project would commence in June 2023 and would last approximately 53 months, ending in first week of November 2027. While the assumed construction start date used for the air quality modeling has passed, a later start date would not alter the analysis since the estimated durations are still applicable. In addition, assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years. The project was assumed to be constructed in one phase, based on the following assumptions (durations are approximate):

- Demolition: 2 months
- Site Preparation: 1 month
- Grading: 13 months
- Building Construction: 31 months

- Paving: 3.5 months
- Architectural Coatings: 2.5 months

The construction phases listed above would occur sequentially. The estimated construction duration was provided by the project applicant. The construction equipment mix used for estimating the construction emissions of the project is also based on information provided by the project applicant and is shown in Table 5.3-4.

Table 5.3-4
Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Demolition	16	4	196	Concrete Industrial Saws	1	8
				Excavators	3	8
				Rubber Tired Dozers	2	8
Site Preparation	18	4	0	Rubber Tired Dozers	3	8
				Tractors/Loaders /Backhoes	4	8
Grading	20	4	2,312	Excavators	2	8
				Graders	1	8
				Rubber Tired Dozers	1	8
				Scrapers	2	8
				Tractors/Loaders /Backhoes	2	8
Building Construction	82	28	0	Cranes	1	7
				Forklifts	3	8
				Generator Sets	1	8
				Welders	3	7
				Tractors/Loaders /Backhoes	1	8
Paving	16	0	0	Pavers	2	8
				Paving Equipment	2	8

Table 5.3-4
Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
				Rollers	2	8
Architectural Coating	4	0	0	Air Compressors	1	6

Note: See Appendix A of Appendix C**.**

For the analysis, it was assumed that heavy construction equipment would be operating 5 days per week (22 days per month) during proposed project construction. Construction worker and vendor trips were based on CalEEMod default assumptions and rounded up to the nearest whole number to account for whole round trips.

Proposed project grading would include approximately 558,043 cubic yards (cy) of cut and 539,543 cy of fill with an export of 18,500 cy to other construction sites or Hanson Aggregates. Conservatively, 564,798 cy of cut and 546,298 cy of fill with 18,500 cy of export was assumed in the CalEEMod analysis. It is anticipated that earth movement would be primarily, if not completely, accomplished using off-road equipment (e.g., scrapers and excavators).

A detailed depiction of the construction schedule—including information regarding phases and equipment used during each phase—is included in Appendix A of Appendix C of this EIR. The information contained in Appendix A of Appendix C was used as CalEEMod inputs.

Development of the project would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, asphalt pavement application, and architectural coatings. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM_{10} and $PM_{2.5}$ emissions. As such, the project would be subject to SDAPCD Rule 55, Fugitive Dust Control. This rule requires the project to take the necessary steps to restrict visible emissions of fugitive dust beyond the project site. Compliance with Rule 55 would limit fugitive dust (PM_{10} and $PM_{2.5}$) generated during grading and construction activities. To account for dust control measures in the calculations, the project would ensure that active construction sites be watered at least three times daily as a condition of project approval.

The exhaust from the internal combustion engines used by construction equipment and vehicles would result in emissions of VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$. In addition, the application of asphalt pavement and architectural coatings would also produce VOC emissions. In accordance with

SDAPCD Rule 67.0.1, the applicant shall use architectural coatings that do not exceed 50 grams per liter for interior and 100 grams per liter for exterior applications, which controls VOCs.

Table 5.3-5 shows the estimated maximum daily construction emissions associated with the construction of the project. Complete details of the emissions calculations are provided in Appendix A to Appendix C of this EIR.

Table 5.3-5
Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per day					
Summer						
2024	N/A	N/A	N/A	N/A	N/A	N/A
2025	3.29	30.6	29.6	0.07	10.8	4.89
2026	1.39	11.00	16.9	0.03	1.26	0.57
2027	1.34	10.40	16.7	0.03	1.22	0.53
2028	1.29	9.93	16.5	0.03	1.18	0.50
2029	N/A	N/A	N/A	N/A	N/A	N/A
Winter						
2024	3.72	36.20	33.80	0.05	21.40	11.60
2025	3.39	31.80	31.00	0.07	21.20	11.40
2026	3.13	28.20	28.70	0.07	10.70	4.78
2027	1.33	10.50	16.30	0.03	1.22	0.53
2028	26.1	9.99	16.10	0.03	1.29	0.50
2029	25.2	1.05	4.43	<0.01	0.89	0.22
Maximum	**26.10**	**36.20**	**33.80**	**0.07**	**21.40**	**11.60**
City Threshold	*137*	*250*	*550*	*250*	*100*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; N/A = not applicable; CalEEMod = California Emissions Estimator Model.
See Appendix A of Appendix C for complete results.
The values shown are the maximum summer or winter daily emissions results from CalEEMod. Although not considered mitigation, these emissions reflect the CalEEMod "mitigated" output, which accounts for the required compliance with SDAPCD Rule 55 (Fugitive Dust) and Rule 67.0.1 (Architectural Coatings).

As shown in Table 5.3-6, daily construction emissions would not exceed the significance thresholds for any criteria air pollutant. Particulate matter emissions would also not exceed 100 pounds per

day. Therefore, impacts during construction of the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Operation

Operation of the project would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile sources (e.g., resident vehicle trips), area sources (e.g., consumer products, landscape maintenance equipment), and energy sources. Pollutant emissions associated with long-term operations of the project were quantified using CalEEMod.

Operational emissions from area sources include emissions from consumer product use, architectural coatings, and landscape maintenance equipment. Consumer products are chemically formulated products used by household and institutional consumers, including detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. Other paint products, furniture coatings, or architectural coatings are not considered consumer products (CAPCOA 2022). Consumer product VOC emissions for the buildings are estimated in CalEEMod based on the floor area of buildings and on the default factor of pounds of VOC per building square foot per day. Consumer products associated with the parking lot and other asphalt surfaces include degreasers, which were estimated based on the square footage of the parking lot and the default factor of pounds of VOC per square foot per day. The CalEEMod default values for consumer products were assumed.

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings, such as in paints and primers used during building maintenance. CalEEMod calculates the VOC evaporative emissions from the application of surface coatings based on the VOC emission factor, the building square footage, the assumed fraction of surface area, and the reapplication rate. The VOC emissions factor is based on the VOC content of the surface coatings, and SDAPCD's Rule 67.0.1 (Architectural Coatings) governs the VOC content for interior and exterior coatings. This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories (SDAPCD 2021). The proposed project would use architectural coatings that would not exceed 50 grams per liter for interior applications and 100 grams per liter for exterior applications consistent with SDAPCD Rule 67.0.1. The model default reapplication rate of 10% of area per year is assumed. Consistent with CalEEMod defaults, it is assumed that the surface area for painting equals 2.7 times the floor square footage, with 75% assumed for interior coating and 25% assumed for exterior surface coating (CAPCOA 2022).

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chainsaws, and hedge trimmers. The emissions associated with landscape equipment use are estimated based on CalEEMod default values for emission factors (grams per square foot of building space per day) and number of summer days (when landscape maintenance would generally be performed) and winter days.

Energy sources include emissions associated with building electricity and natural gas usage. CalEEMod default values were used to estimate emissions. Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for greenhouse gases in CalEEMod, since criteria pollutant emissions occur at the site of the power plant, which is typically off site. Emissions associated with natural gas usage in space heating and water heating and wood burning fireplaces are calculated in the building energy use module of CalEEMod. However, the project includes PDFs that prohibit fireplaces, PDF-AQ-1, and ensure no natural gas will be utilized by the project, PDF-AQ-2.

Mobile sources include vehicular traffic from residents of the project. Project-generated mobile source emissions were estimated in CalEEMod based on project-specific trip rates. The maximum weekday trip rates were taken from the Local Mobility Analysis for the project (Appendix B2). The weekend trip rates were adjusted based on CalEEMod default trip rates. CalEEMod default data, including trip characteristics and emissions factors, were used for the model inputs. Project-related traffic was assumed to include a mixture of vehicles in accordance with the associated use, as modeled within the CalEEMod. Emission factors representing the vehicle mix and emissions for 2028 were used to estimate emissions associated with vehicular sources. Table 5.3-6 presents the maximum daily area, energy, and mobile source emissions associated with the start of project operation (Year 2027) without mitigation**.** Details of the emission calculations are provided in Appendix A to Appendix C of this EIR.

Table 5.3-6
Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Emission Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per day					
Summer						
Area	5.44	1.08	6.80	0.01	0.08	0.09
Energy	0.04	0.76	0.32	<0.01	0.06	0.06
Mobile	4.15	2.79	30.30	0.08	2.75	0.53
Summer Total	**9.63**	**4.63**	**37.42**	**0.09**	**2.89**	**0.68**
Winter						
Area	4.88	1.02	0.43	0.01	0.08	0.08
Energy	0.04	0.76	0.32	<0.01	0.06	0.06

Table 5.3-6
Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Emission Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per day					
Mobile	4.08	3.06	28.60	0.07	2.75	0.53
Winter Total	**8.99**	**4.84**	**29.35**	**0.08**	**2.89**	**0.67**
Maximum Total	**9.63**	**4.84**	**37.42**	**0.09**	**2.89**	**0.68**
City Threshold	*137*	*250*	*550*	*250*	*100*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Note: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter.

As shown in Table 5.3-7, the combined daily area, energy, and mobile source emissions as a result of project operation would not exceed the City's operational thresholds for VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$. Particulate matter emissions would also not exceed 100 pounds per day. Impacts during project operation would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Furthermore, as the project would be built over a period of 5 years, with some occupancy occurring during the construction of other residential units, the overlap of construction and operational emissions was evaluated to determine the peak day. As a conservative approach, the maximum daily construction emissions were added to the maximum operational emissions for each air pollutant. This assumes maximum construction operations would occur at the same time as maximum operational emissions. This assumption is highly conservative, as the maximum operational emissions won't be achieved until construction is complete. Table 5.3-7 shows the maximum overlap of construction and operational emissions from the project.

Table 5.3-7
Estimated Maximum Daily Overlap between Construction and Operational Criteria Air Pollutant Emissions

Emission Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per day					
Construction	26.10	36.20	33.80	0.07	21.40	11.60
Operation	9.63	4.84	37.42	0.09	2.89	0.68
Total	**35.73**	**41.04**	**71.22**	**0.16**	**24.29**	**12.28**
City Threshold	*137*	*250*	*550*	*250*	*100*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Note: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter.

Maximum daily overlap of construction and operation of the project would not exceed the operational emissions threshold or the 100 pounds per day threshold of PM_{10}. As such, impacts would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Cumulative Analysis

The SDAB has been designated as a federal nonattainment area for O_3 and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The poor air quality in the SDAB is the result of cumulative emissions from motor vehicles, off-road equipment, commercial and industrial facilities, and other emission sources. Projects that emit these pollutants or their precursors (i.e., VOCs and NO_x for O_3) potentially contribute to poor air quality. In analyzing cumulative impacts from a project, the analysis must specifically evaluate the project's contribution to the cumulative increase in pollutants for which the SDAB is designated as nonattainment for the CAAQS and NAAQS. If the project does not exceed thresholds and is determined to have less-than-significant project-specific impacts, it may still contribute to a significant cumulative impact on air quality if the emissions from the project, in combination with the emissions from other proposed or reasonably foreseeable future projects, are in excess of established thresholds. However, a project would only be considered to have a significant cumulative impact if the project's contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact).

Regarding short-term construction impacts, the SDAPCD thresholds of significance are used to determine whether the project may have a short-term cumulative impact. As shown in Table 5.3-5, the project would not exceed any criteria air pollutant during construction.

Additionally, for the SDAB, the RAQS serves as the long-term regional air quality planning document for the purpose of assessing cumulative operational emissions in the basin to ensure the SDAB continues to make progress toward NAAQS- and CAAQS-attainment status. As such, cumulative projects located in the San Diego region would have the potential to result in a cumulative impact to air quality if, in combination, they would conflict with or obstruct implementation of the RAQS. Similarly, individual projects that are inconsistent with the regional planning documents upon which the RAQS is based would have the potential to result in cumulative operational impacts if they represent development and population increases beyond regional projections.

Regarding long-term cumulative operational emissions in relation to consistency with local air quality plans, the SIP and RAQS serve as the primary air quality planning documents for the state and SDAB, respectively. The SIP and RAQS rely on SANDAG growth projections based on population, vehicle trends, and land use plans developed by the cities and the County as part of the

development of their general plans. Therefore, projects that propose development that is consistent with the growth anticipated by local plans would be consistent with the SIP and RAQS and would not be considered to result in cumulatively considerable impacts from operational emissions. As stated previously, the project would not result in significant regional growth that is not accounted for within the RAQS.

Significance of Impact

The project would include PDF-AQ-1, and PDF-AQ-2, which reduce project emissions. The project construction and operational emissions would not exceed the significance thresholds for any criteria air pollutant. The overlapping construction and operational emissions would also not exceed any significance thresholds. Impacts associated with conflicts with air quality standards or a cumulatively considerable net increase of any criteria pollutant would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.3.3.3 Issue 4: Substantial Pollutant Concentrations

Issue 4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Thresholds

To determine the significance of the project's emissions on the environment, the City's CEQA Significance Determination Thresholds (City of San Diego 2022) were used. Per the City's thresholds, the project would have a significant impact on air quality if the project would:

- Expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates.

Impact Analysis

Air quality varies as a direct function of the amount of pollutants emitted into the atmosphere, the size and topography of the air basin, and the prevailing meteorological conditions. Air quality problems arise when the rate of pollutant emissions exceeds the rate of dispersion. Reduced visibility, eye irritation, and adverse health impacts upon those persons termed "sensitive receptors" are the most serious hazards of existing air quality conditions in the area. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution, as identified by the City (City of San Diego 2020), include children, the elderly, athletes, and people with

cardiovascular and chronic respiratory diseases. As such, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes. The closest sensitive receptors to the proposed project are residences and the park adjacent to the project property boundaries.

Health Impacts of Toxic Air Contaminants

The San Diego Municipal Code Division 7, Off-Site Development Impact Regulations, Section 142.0710, states the following: "Air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health, cause damage to vegetation or property, or cause soiling shall not be permitted to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located."

The proposed project would not result in the generation of smoke, charred paper, soot, grime, carbon, noxious acids, or toxic fumes. As demonstrated in Tables 5.3-5, 5.3-6, and 5.3-7, criteria air pollutants, including particulate matter, during construction and operation of the project would be below City thresholds of significance and therefore would not represent a release substantial quantities of air contaminants beyond the project boundaries.

Construction

"Incremental cancer risk" is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period would contract cancer based on the use of standard Office of Environmental Health Hazard Assessment (OEHHA) risk-assessment methodology (OEHHA 2015). In addition, some TACs have noncarcinogenic effects. TACs that would potentially be emitted during construction activities would be DPM emitted from heavy-duty construction equipment and heavy-duty trucks. Heavy-duty construction equipment and diesel trucks are subject to CARB ATCMs to reduce DPM emissions. According to the OEHHA, health risk assessments (HRAs) should be based on a 30-year exposure duration based on a typical residency period; however, such assessments should be limited to the period/duration of activities associated with the project (OEHHA 2015). The duration of proposed construction activities would be approximately 53 months. Upon completion of construction, there would be no long-term source of TAC emissions during operation.

An HRA was performed to evaluate the risk from diesel exhaust emissions on existing sensitive receptors from construction activities (provided as Appendix B to Appendix C). This report includes an HRA associated with emissions from the construction of the project based on the methodologies prescribed in the OEHHA document, Air Toxics Hot Spots Program Risk Assessment Guidelines – Guidance Manual for Preparation of Health Risk Assessments (OEHHA Guidelines) (OEHHA 2015). To

implement the OEHHA Guidelines based on proposed project information, the SDAPCD has developed a three-tiered approach where each successive tier is progressively more refined, with fewer conservative assumptions. The SDAPCD document, Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments (SDAPCD 2019), provides guidance with which to perform HRAs within the SDAB.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SDAPCD identifies a "significance risk threshold" as any of the following health risk levels: (i) maximum individual cancer risks equal to or greater than 10 in one million, (ii) cancer burden equal to or greater than 1.0, (iii) total acute noncancer health hazard index equal to or greater than 1.0, or (iv) total chronic noncancer health hazard index equal to or greater than 1.0 (Rule 1210). Additionally, some TACs increase non-cancer health risk due to long-term (chronic) exposures. The Chronic Hazard Index is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system. The SDAPCD recommends a Chronic Hazard Index significance threshold of one (project increment).

The exhaust from diesel engines is a complex mixture of gases, vapors, and particles, many of which are known human carcinogens. DPM has established cancer risk factors and relative exposure values for long-term chronic health hazard impacts. No short-term, acute relative exposure level has been established for DPM; therefore, acute impacts of DPM are not addressed in this assessment. The HRA for the proposed project evaluated the risk to existing residents from diesel emissions from exhaust from on-site construction equipment and diesel haul and vendor trucks.

The dispersion modeling of DPM was performed using the American Meteorological Society/EPA Regulatory Model (AERMOD), which is the model SDAPCD requires for atmospheric dispersion of emissions. AERMOD is a steady-state Gaussian plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of surface and elevated sources, building downwash, and simple and complex terrain (EPA 2021). For the proposed project, AERMOD was run with all sources emitting unit emissions (1 gram per second) to obtain the "X/Q" values. X/Q is a dispersion factor that is the average effluent concentration normalized by source strength and is used as a way to simplify the representation of emissions from many sources. The X/Q values of ground-level concentrations were determined for construction emissions using AERMOD and the maximum concentrations were determined for the 1-hour and period-averaging periods.

The detailed assessment is provided in Appendix B to Appendix C of this EIR. Table 5.3-8 summarizes the results of the HRA for project construction.

Table 5.3-8
Construction Activity Health Risk Assessment Results

Impact Parameter	Units	Project Impact	CEQA Threshold
Off-Site			
Cancer Risk	Per Million	45.20	10.0
HIC	Not Applicable	0.02	1.0

Source: Appendix B of Appendix C.
Notes: CEQA = California Environmental Quality Act; HIC = Chronic Hazard Index.

The results of the HRA demonstrate that the TAC exposure from construction diesel exhaust emissions would result in cancer risk on site above the 10 in 1 million threshold, as well as a Chronic Hazard Index rating of less than 1.0. Therefore, TAC emissions from the construction of the project would potentially expose sensitive receptors to substantial pollutant concentrations

Health Impacts of Carbon Monoxide

There is a potential for the formation of microscale CO "hotspots" in the area immediately around points of congested traffic. Because of continued improvement in mobile emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SDAB is steadily decreasing. The City's Significance Determination Thresholds (City of San Diego 2022) CO hotspot screening guidance was followed to determine if the project would require a site-specific hotspot analysis. The City recommends that a quantitative analysis of CO hotspots be performed if a proposed development causes a six-lane or four-lane roadway to deteriorate to level of service (LOS) E or worse, causes a six-lane roadway to drop to LOS F, or if a proposed development is within 400 feet of a sensitive receptor and the LOS is D or worse. The project's Local Mobility Analysis determined that with the addition of project traffic all intersections—including Scripps Poway Parkway/Spring Canyon Road, Scripps Poway Parkway/Cypress Canyon Road, Scripps Poway Parkway/Angelique Street/Springbrook Drive, Angelique Street/Cypress Canyon Park Drive, Angelique Street/Cypress Canyon Road, Cypress Canyon Park Drive/Cypress Canyon Road, Spring Canyon Road/Pomerado Road/Cypress Canyon Park Drive, and Spring Canyon Road/Stonebridge Parkway—would continue to operate at acceptable LOS D or better and therefore would not exceed the City's screening guidance for CO hotspots (Appendix B2). Therefore, a CO hotspot analysis is not needed.

Health Impacts of Other Criteria Air Pollutants

Construction and operation of the project would not result in emissions that exceed the SDAPCD's emission thresholds for any criteria air pollutants. Regarding VOCs, some VOCs are associated with

motor vehicles and construction equipment, while others are associated with architectural coatings, the emissions of which would not result in the exceedances of the SDAPCD's thresholds. Generally, the VOCs in architectural coatings are of relatively low toxicity. Additionally, SDAPCD Rule 67.0.1 restricts the VOC content of coatings for both construction and operational applications.

In addition, VOCs and NO_x are precursors to O_3, for which the SDAB is designated as nonattainment with respect to the NAAQS and CAAQS (the SDAB is designated by EPA as an attainment area for the 1-hour O_3 NAAQS standard and 1997 8-hour NAAQS standard). The health effects associated with O_3 are generally associated with reduced lung function (Appendix C). The contribution of VOCs and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SDAB due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC emissions would occur, because exceedances of the O_3 ambient air quality standards tend to occur between April and October when solar radiation is highest.

Regarding NO_2, according to the construction emissions analysis, the construction of the project would not contribute to exceedances of the NAAQS and CAAQS for NO_2. Health impacts from exposure to NO_2 and NO_x are associated with respiratory irritation, which may be experienced by nearby receptors during the periods of heaviest use of off-road construction equipment (Appendix C). However, these operations would be relatively short term. Additionally, off-road construction equipment would operate at various portions of the site and would not be concentrated in one portion of the site at any one time. Construction of the project would not require any stationary emission sources that would create substantial, localized NO_x impacts.

The VOC and NO_x emissions, as described previously, would minimally contribute to regional O_3 concentrations and its associated health effects. In addition to O_3, NO_x emissions would not contribute to potential exceedances of the NAAQS and CAAQS for NO_2. As shown in Table 5.3-2, the existing NO_2 concentrations in the area are well below the NAAQS and CAAQS standards. Thus, it is not expected that the project's operational NO_x emissions would result in exceedances of the NO_2 standards or contribute to the associated health effects. CO tends to be a localized impact associated with congested intersections. The associated CO "hotspots" were discussed previously as not exceeding the City's screening guidance for CO hotspots. Thus, the project's CO emissions would not contribute to significant health effects associated with this pollutant. Likewise, PM_{10} and $PM_{2.5}$ would not contribute to potential exceedances of the NAAQS and CAAQS for particulate matter, would not obstruct the SDAB from coming into attainment for these pollutants, and would not contribute to significant health effects associated with particulates.

Significance of Impact

While health impacts of CO and other criteria pollutants would be less than significant, the project's potential to expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates would be potentially significant because the unmitigated cancer risk of 45.20 in a million exceeds the threshold of 10 in a million.

Mitigation Measures

To reduce the potentially significant cancer risk impact from construction emissions, the project shall implement the following mitigation measure (MM):

MM-AQ-1: Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Permits, and Building Permits, or a Notice to Proceed for Subdivisions by the City of San Diego (City), the Owner/Permittee shall ensure via a written letter provided to the City Mitigation Monitoring Coordinator that all 75-horsepower or greater diesel-powered equipment is powered with California Air Resources Board–certified Tier 4 Interim engines or better. Should Tier IV equipment not be available or possible, the applicant may submit a request to the Development Services Department Environmental Analysis Section to apply an equivalent method of achieving project-generated construction emissions that fall below the numeric California Environmental Quality Act (CEQA) cancer risk standard. Documentation using industry-standard emission estimation methodologies shall be furnished to the City demonstrating that estimated project-generated construction emissions would not exceed the applicable CEQA cancer risk threshold with the alternate construction method(s). If the documentation demonstrates that project-generated construction emissions will remain below the applicable cancer risk threshold, then the City Development Services Department Environmental Analysis Section may approve the alternate construction method(s) at their discretion. Required construction equipment fleet and methodologies approved by the City shall be included in the contract specifications for the applicant's construction contractor.

Significance after Mitigation

As shown in Table 5.3-8, the construction HRA results from the unmitigated scenario show cancer risks exceeding the 10 in 1 million threshold and thus a potentially significant impact at the maximally exposed individual residential receptors. Implementation of MM-AQ-1 would reduce project construction-generated DPM missions to the extent feasible. The HRA results after incorporation of MM-AQ-1 are presented in Table 5.3-9.

Table 5.3-9
Construction Activity Health Risk Assessment Results – Mitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk – Residential	Per Million	8.52	10	Less than Significant
Chronic Hazard Index – Residential	Index Value	0.004	1.0	Less than Significant

Source: Appendix B of Appendix C.
Notes: CEQA = California Environmental Quality Act.

The project would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

5.3.3.4 Issue 5: Odors

Issue 5: Would the project create objectionable odors affecting a substantial number of people?

Thresholds

To determine the significance of the project's emissions on the environment, the City's CEQA Significance Determination Thresholds (City of San Diego 2022) were used. Per the City's thresholds, the project would have a significant impact on air quality if the project would:

- Create objectionable odors affecting a substantial number of people.

The City also states that the significance of potential odor impacts should be determined based on what is known about the quantity of the odor compounds that would result from the project's proposed uses, the types of neighboring uses potentially affected, the distances between the project's point sources and the neighboring uses such as sensitive receptors, and the resultant concentrations at the receptors.

Impact Analysis

Section 41700 of the California Health and Safety Code and SDAPCD Rule 51 (Public Nuisance) prohibit emissions from any source whatsoever in such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to the public health or damage to property. Projects required to obtain permits from SDAPCD are evaluated by SDAPCD staff for potential odor nuisance, and conditions may be applied (or control equipment required) where necessary to prevent occurrence of public nuisance.

SDAPCD Rule 51 (Public Nuisance) also prohibits the emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person. A project that proposes a use that would produce objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of off-site receptors. Odor issues are very subjective by the nature of odors themselves and due to the fact that their measurements are difficult to quantify. As a result, this guideline is qualitative and will focus on the existing and potential surrounding uses and location of sensitive receptors.

The occurrence and severity of potential odor impacts depend on numerous factors: the nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of the receiving location each contributing to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying, cause distress among the public, and generate citizen complaints.

Construction

Odors would be potentially generated from vehicles and equipment exhaust emissions during the construction of the project. Potential odors produced during the proposed construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people.

Operation

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The project includes residential uses that are not anticipated to result in substantial odors.

Significance of Impact

Impacts associated with odors during construction and/or operation would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.3.3.5 Issue 6: Alteration of Air Movement

Issue 6: Would the project result in substantial alteration of air movement in the area of the project?

Thresholds

Per the City's thresholds (City of San Diego 2022), the project would have a significant impact on air quality if the project would:

- Result in substantial alteration of air movement in the area of the project.

Impact Analysis

The proposed project is situated on a 40.56-acre site within the Scripps Miramar Ranch Community Plan Area. The project site surrounded by existing residential developments, open space, and parkland. Given the project's location within an already developed area, the construction of new residential buildings would not substantially alter air movement in the area as discussed below.

This issue of alteration of air movement is usually associated with the placement of tall structures in proximity that can result in tunneling of air movement in an area that was previously unobstructed. This typically occurs in developed urban areas with tall buildings that create a wind tunnel effect. In the case of the project, the proposed residential units would not include tall structures in proximity resulting in tunneling of air movement. The nearby open space and parkland, along with the surrounding residential developments, help to maintain natural airflow patterns. Furthermore, the scale of the proposed development is consistent with the existing residential uses in the area and would not involve the introduction of large structures or significant landform alterations that would impede or redirect air currents in a substantial manner.

Given that the project site is surrounded by similar land uses and topographical features, and considering the project does not include tall structures in proximity, the project would not result in a substantial alteration of air movement within the area. The project is designed to integrate with the existing neighborhood and topography, thereby maintaining the current air circulation patterns typical of the Community Plan Area.

In summary, the residential development would not significantly affect air movement in the area, as it would align with existing development patterns and topographical features that contribute to the natural air circulation in the region.

Significance of Impact

Impacts relating to alteration of air movement would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

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5.4 BIOLOGICAL RESOURCES

This section describes the existing biological resources conditions of the proposed Renzulli Estates Project (project) site, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, as applicable. The following discussion is based on the Biological Technical Report prepared by Dudek (August 2025) and included as Appendix D.

5.4.1 EXISTING CONDITIONS

Physical Conditions

The 40.56-acre project site is located on primarily undeveloped land within the City of San Diego. The site is primarily characterized by undeveloped land and currently features a large existing residence, several outbuildings, and two associated sheds. The project overlaps with a total of 33.40 acres of Multi-Habitat Planning Area (MHPA) lands. The project site is surrounded by existing residential development, small patches of undeveloped open space, and Cypress Canyon Park to the east.

Vegetation Communities

A total of 13 vegetation communities were identified on the project site: Diegan coastal sage scrub (including disturbed), Diegan coastal sage scrub (*Baccharis*-dominated), coastal sage–chaparral transition, flat-topped buckwheat scrub, southern mixed chaparral (including disturbed), scrub oak chaparral, emergent wetland, natural flood channel, disturbed habitat, eucalyptus woodland, developed land, *Arundo*-dominated disturbed habitat, and herbaceous wetland (artificial) (Table 5.4-1; Figure 5.4-1, Existing Vegetation Communities and Rare Plants).

Table 5.4-1
Vegetation Communities and Land Cover Types in the Project Area

Vegetation Community/ Land Cover Type	City of San Diego Biology Guidelines Vegetation Community	Subarea Plan Tier	Acreage
Native Vegetation Communities			
Diegan coastal sage scrub (including disturbed)	Coastal sage scrub	II	4.60
Diegan coastal sage scrub (*Baccharis*-dominated)	Coastal sage scrub	II	0.11
Coastal sage–chaparral transition	Coastal sage scrub/chaparral	II	4.08

Table 5.4-1
Vegetation Communities and Land Cover Types in the Project Area

Vegetation Community/ Land Cover Type	City of San Diego Biology Guidelines Vegetation Community	Subarea Plan Tier	Acreage
Flat-topped buckwheat scrub	Coastal sage scrub	II	2.41
Southern mixed chaparral (including disturbed)	Mixed chaparral	IIIA	12.25
Scrub oak chaparral	Scrub oak chaparral	I	2.46
Non-Native Vegetation Communities and Land Covers			
Disturbed habitat	Disturbed land	IV	6.96
Eucalyptus woodland	Eucalyptus woodland	IV	3.58
Urban/developed land	Disturbed land	IV	2.34
Arundo-dominated disturbed habitat	Disturbed land	IV	0.74
Wetlands, including Non-Wetland Waters of the United States and State			
Emergent wetland (artificial)	Freshwater marsh	IV	0.41
Herbaceous wetland (artificial)	Disturbed land	IV	0.42
Natural Flood Channel	Disturbed Land	IV	0.20
		Total	**40.56**

Source: Appendix D.

Diegan Coastal Sage Scrub (Including Disturbed)

Diegan coastal sage scrub is a native vegetation community composed of a variety of soft, low, aromatic shrubs, characteristically dominated by drought-deciduous species—such as coastal sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), and sages (*Salvia* spp.)—with scattered evergreen shrubs, including lemonadeberry (*Rhus integrifolia*) and laurel sumac (*Malosma laurina*).

Coastal sage scrub in the project area consists of coastal sagebrush, black sage (*Salvia mellifera*), and Nuttall's scrub oak (*Quercus dumosa*). Coastal sage scrub is present in moderately sized patches in the north and northwest section of the project site and in two small patches in the southern area. Some of the patches in the northern area of the project site, north of the existing residence, are considered disturbed due to a relatively high cover of non-native species (specifically giant reed

[*Arundo donax*]) and evidence of human alteration. This vegetation community is considered a Tier II habitat by the City's Biology Guidelines (City of San Diego 2018a).

Diegan Coastal Sage Scrub (Baccharis-Dominated)

Diegan coastal sage scrub (*Baccharis*-dominated) is similar to Diegan coastal sage scrub but dominated by *Baccharis* species (broom baccharis [*Baccharis sarothroides*] and/or coyote brush [*Baccharis pilularis*]) (Oberbauer et al. 2008). This community typically occurs on disturbed sites or those with nutrient-poor soils and is often found within other forms of Diegan coastal sage scrub and on upper terraces of river valleys.

Diegan coastal sage scrub (*Baccharis*-dominated) in the project area is dominated by coyote brush, with chamise (*Adenostoma fasciculatum*), black sage, and mission manzanita (*Xylococcus bicolor*). It occurs in one small patch in the central northern section of the project site just west of the artificial herbaceous wetland, in an area likely disturbed by previous grading associated with the adjacent development to the north. This vegetation community is considered a Tier II habitat by the City's Biology Guidelines (City of San Diego 2018a).

Coastal Sage-Chaparral Transition

Coastal sage–chaparral transition is a habitat type composed of a mixture of coastal sage scrub and chaparral species occurring in the transition zone between coastal sage scrub and chaparral (Oberbauer et al. 2008).

Coastal sage–chaparral transition in the project area consists of chamise, laurel sumac, and Nuttall's scrub oak. Coastal sage–chaparral transition is present in relatively large patches just southwest of the existing residence in the central area of the project site. This vegetation community is considered a Tier II habitat by the City's Biology Guidelines (City of San Diego 2018a).

Flat-Topped Buckwheat Scrub

Flat-topped buckwheat scrub is a native vegetation community that, according to Oberbauer et al. (2008), is a near monoculture community of California buckwheat, usually resulting from disturbance and transitioning to coastal sage scrub or chaparral. It is often found in disturbed areas in coastal and foothills areas of San Diego County and intergrades frequently with Diegan coastal sage scrub.

Flat-topped buckwheat scrub in the project area is dominated by California buckwheat with felt-leaf yerba santa (*Eriodictyon crassifolium*) and coastal goldenbush (*Isocoma menziesii*). Buckwheat scrub is present in the south and southeast portion of the project site, southeast of the existing residence.

This vegetation community most closely matches coastal sage scrub in the City's Biology Guidelines (City of San Diego 2018a). Therefore, it is considered a Tier II habitat.

Southern Mixed Chaparral (Including Disturbed)

Southern mixed chaparral is a drought- and fire-adapted community of woody shrubs that is 1.5 meters to 3 meters (5 feet to 10 feet) tall, frequently forming dense, impenetrable stands. It develops primarily on mesic, north-facing slopes and in canyons and is characterized by crown- or stump-sprouting species that regenerate following burns or other ecological catastrophes. This vegetation community is typically a mixture of chamise, bush-rue (*Cneoridium dumosum*), ceanothus (*Ceanothus* spp.), manzanita species (Eastwood's manzanita [*Arctostaphylos glandulosa*] and mission manzanita), Nuttall's scrub oak, laurel sumac, and black sage.

Southern mixed chaparral in the project area is dominated by chamise with coyote brush, black sage, Nuttall's scrub oak, laurel sumac, and Del Mar manzanita (*Arctostaphylos glandulosa* ssp. *crassifolia*). Southern mixed chaparral is present in several relatively large patches in the northeast, east, southeast, and western portions of the project site. Two smaller patches of southern mixed chaparral exist in the northern area of the project site near an existing shed structure. One of these patches, west of this structure, is considered disturbed due to low vegetation cover and evidence of ground disturbance. This vegetation community is considered a Tier IIIA habitat by the City's Biology Guidelines (City of San Diego 2018a).

The southern mixed chaparral in the project area does not conform with southern maritime chaparral vegetation descriptions (Oberbauer et al. 2008). The two indicators of southern maritime chaparral on the project site are Del Mar manzanita and Nuttall's scrub oak, both of which occur in both coastal and relatively inland settings such as the eastern portions of Miramar Marine Corps Air Station. Other indicators of southern maritime chaparral are absent from the site, including wart-stem lilac (*Ceanothus verrucosus*), weathered sandstone soils, and low-growing, open vegetation cover. The chaparral on site, by contrast, has a tall, dense, closed canopy with a predominance of chamise. The project site is located approximately 11 miles from the coast, and topographic barriers exist such that the coastal influence required to establish the southern maritime chaparral vegetation community variety is also absent from this site.

Scrub Oak Chaparral

Scrub oak chaparral contains a dense, evergreen chaparral up to 20 feet tall, often dominated by Nuttall's scrub oak with considerable mountain-mahogany (*Cercocarpus* spp.). In San Diego County, scrub oak (*Quercus berberidifolia*) is often the dominant species (over 50% cover) and usually occurs in small patches within a variety of other vegetation communities (Oberbauer et al. 2008). Scrub oak chaparral is somewhat more mesic than many chaparrals and often occurs at slightly higher

elevations (to ~5,000 feet above mean sea level [amsl]). These more favorable sites recover from fire more quickly than other chaparrals. Substantial leaf litter accumulates. In San Diego County, this is usually found on north-facing or otherwise mesic slopes and can occur at various elevations (Oberbauer et al. 2008).

Scrub oak chaparral in the project site consists of Nuttall's scrub oak, toyon (*Heteromeles arbutifolia*), and mission manzanita. Scrub oak chaparral is present in a small patch on the central eastern section of the project site. This vegetation community is considered a Tier I habitat by the City's Biology Guidelines (City of San Diego 2018a). The description of southern mixed chaparral above, which details why the chaparral on site does not conform with southern maritime chaparral vegetation descriptions, also applies to this community of scrub oak chaparral on site.

Disturbed Habitat/Land

Disturbed lands are areas that have been subject to extensive physical anthropogenic disturbance and as a result cannot be identified as a native or naturalized vegetation association. However, these areas typically still have a recognizable soil substrate. The existing vegetation is typically composed of non-native ornamental or exotic species (Oberbauer et al. 2008).

Disturbed land comprises the gravel storage areas northeast of the residence, dirt roads and ornamental vegetation in the central section of the project site, and strips of land in the southern project area north of the wetlands that show evidence of grading and vegetation removal/clearing. This land cover is ranked as Tier IV and is not considered sensitive under the City's Biology Guidelines (City of San Diego 2018a).

Eucalyptus Woodland

Eucalyptus woodland, according to Oberbauer et al. (2008), includes eucalyptus species (blue gum [*Eucalyptus globulus*], river red gum [*E. camaldulensis*], or other *Eucalyptus* species) planted as trees, groves, and windbreaks that form thickets with minimal shrubby understory and scattered trees with a well-developed understory. In most cases, however, eucalyptus trees form dense stands with closed canopies where the understory is either depauperate or absent owing to shade and the possible allelopathic (toxic) properties of the eucalyptus leaf litter. Although eucalyptus woodlands are of limited value to most native plants and animals, they frequently provide nesting and perching sites for several raptor species.

Eucalyptus woodland occurs mainly in the southwest portion of the project site, south of the wetlands in that area. Smaller patches of eucalyptus woodland occur northwest of the existing residence and in the southeast corner of the project site. Eucalyptus woodland is classified as a Tier IV vegetation community under the City's Biology Guidelines (City of San Diego 2018a).

Urban/Developed Land

According to Oberbauer et al. (2008), urban/developed land represents areas that have been constructed upon or otherwise physically altered to an extent that native vegetation communities are not supported. This land cover type generally consists of semi-permanent structures, homes, parking lots, pavement or hardscape, and landscaped areas that require maintenance and irrigation (e.g., ornamental greenbelts). Typically, this land cover type is unvegetated or supports a variety of ornamental plants and landscaping.

Within the project area, urban/developed land includes the existing residence, the associated paved driveway, and other human-made structures on the project site and the adjacent residential development areas. This land cover is synonymous with disturbed land and is considered a Tier IV vegetation community (City of San Diego 2018a).

Arundo-Dominated Disturbed Habitat

Arundo-dominated disturbed habitat is composed of monotypic or nearly monotypic stands of giant reed and is fairly widespread in Southern California. Typically, this habitat occurs on moist soils and/or in streambeds and may be related directly to soil disturbance or the introduction of propagules by grading or flooding.

Arundo-dominated disturbed habitat comprises one dense stand of giant reed within the project area just northeast of the existing residence in the central project area. It is positioned on a steep north-facing slope and did not show signs that it was associated with any wetland or riparian features. This land cover is synonymous with disturbed land and is considered a Tier IV vegetation community (City of San Diego 2018a).

Emergent Wetland (Artificial)

According to Oberbauer et al. (2008), emergent wetland is a generally persistent wetland type dominated by low-growing, perennial wetland species. These can be found in channels, seeps and springs, floodplains, margins of lakes and rivers, and various basins such as pools and ponds, palustrine lakes, montane meadows, and dune swales. These may be freshwater or alkali wetlands. In San Diego County, these are often in previously disturbed areas where wetlands are emerging but have not yet established a full suite of species; however, disturbance is not a necessary element of this vegetation community.

The area mapped as emergent wetland in the project area is dominated by mariposa rush (*Juncus dubius*), with annual beard grass (*Polypogon monspeliensis*), toad rush (*Juncus bufonius*), grass poly (*Lythrum hyssopifolia*), curly dock (*Rumex crispus*), Boccone's sand-spurrey (*Spergularia bocconi*), and

other non-native herbaceous species. It occurs in two patches of lowlands adjacent to a well-defined drainage in the southern portion of the project area. These two patches correspond with areas of historic disturbance (see Appendix M of Appendix D); the upstream area is the location of a former artificial impoundment (i.e., stock pond), and the downstream area is the location where adjacent development created an artificial impoundment. Further, City records contain evidence that artificial surface runoff was discharged into this drainage from the adjacent Spring Canyon Reservoir (i.e., water tank) (City of San Diego 2013; Appendix N of Appendix D). Based on these factors, an emergent wetland on site is considered an artificial feature that does not meet the City's wetland definition and is considered a Tier IV upland.

Herbaceous Wetland (Artificial)

According to Oberbauer et al. (2008), herbaceous wetland is a seasonal wetland habitat that supports a variety of herbaceous annual species like annual beard grass. In San Diego County, these wetlands may only occur during wetter-than-average years and are usually found in swale areas or adjacent to drainages.

Herbaceous wetland (artificial) is present within the northern portion of the project area and is dominated by annual beard grass. Other species present include western ragweed (*Ambrosia psilostachya*), curly dock, mule-fat (*Baccharis salicifolia*), hottentot-fig (*Carpobrotus edulis*), saltcedar (*Tamarix ramosissima*), and jointed charlock (*Raphanus raphanistrum*). During the jurisdictional delineation performed in April 2020, biologists noted a large population of Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*) in this area.

However, this area is not considered a City wetland per the City's Biology Guidelines (City of San Diego 2018a) because, based on review of historical aerials and topography, the wetland established as a result of the construction of the residential development to the north, which directed runoff to this area and created conditions suitable for development of the wetland. Prior to the adjacent development, the area supported an upland hillslope, consistent with adjacent areas (Appendix M, Historic Aerial Imagery, of Appendix D). As stated in the City's Biology Guidelines, "except for areas created for the purposes of wetland habitat or resulting from human actions to create open waters or from the alteration of natural stream courses, it is not the intent of the City to regulate artificially created wetlands in historically non-wetland areas unless they have been delineated as wetlands by the Army Corps of Engineers, and/or the California Department of Fish and Wildlife." As a result, the herbaceous wetland (artificial) in this location would be considered Tier IV (City of San Diego 2018a).

Natural Flood Channel

Natural flood channel, also described as non-vegetated channel or floodway (Oberbauer et al. 2008), is the sandy, gravelly, or rocky fringe of waterways or flood channels that are earthen-bottom, and unvegetated on a relatively permanent basis. Vegetation may be present but is usually less than 10% total cover and grows on the outer edge of the channel.

Natural flood channel is mapped within small ephemeral drainage features on the project site. Although unvegetated, natural flood channel can be considered a wetlands community according to the City's Biology Guidelines when the overall drainage is substantial enough to support "wetland dependent vegetation" (City of San Diego 2018a). The natural flood channel present in the southern section of the project parcel is connected to emergent wetland habitat upstream and downstream of these unvegetated channel sections. However, the emergent wetland is artificial (as described above). Therefore, both the natural flood channel extents that are located on the upland hillsides on the project parcel and in the southern section of the project parcel were determined to consist of seasonal drainage patterns that do not support wetland dependent vegetation and are not considered City wetlands in accordance with the City's Biology Guidelines (City of San Diego 2018a).

Floral Diversity

A total of 103 species of vascular plants, 61 native (59%) and 42 non-native (41%), were recorded during the biological reconnaissance survey for the project. A cumulative list of all common and sensitive plant species observed in the project area is provided in Appendix A of Appendix D.

Special-Status Plants

Plant species are considered special status if they have been listed or proposed for listing by the federal or state government as rare, endangered, or threatened (listed species); have a California Rare Plant Rank (CRPR) of 1–4; are listed as a Multiple Species Conservation Program (MSCP)-covered species; and/or have been adopted by the City as narrow endemic.

A potential to occur analysis was completed as a part of the biological technical report (Appendix E of Appendix D). Special-status plant species with a moderate potential to occur in the project area were determined to include the western spleenwort (*Asplenium vespertinum*), Campbell's liverwort (*Geothallus tuberosus*), California adder's-tongue (*Ophioglossum californicum*), and bottle liverwort (*Sphaerocarpos drewei*). These species are described in further detail in Appendix E of Appendix D. Focused rare plant surveys in June, July, and August 2020 captured most perennial and annual plant species that occur within the project area. Five special-status plant species were directly observed, consisting of Del Mar manzanita, San Diego county viguiera (*Viguiera [Bahiopsis] laciniata*), San Diego barrel cactus (*Ferocactus viridescens*), Coulter's goldfields, and Nuttall's scrub oak (Figure 5.4-1).

Del Mar Manzanita

Del Mar manzanita is federally endangered and is a CRPR 1B.1 and an MSCP-covered species. Del Mar manzanita is a California native shrub that naturally occurs in a narrow range within coastal San Diego County (Calflora 2020). This species is typically found in chaparral and naturally occurs at an elevation of 0 feet to 1,200 feet amsl.

A total of 23 Del Mar manzanita individuals were observed in scrub oak chaparral and mixed chaparral in the northern portion of the study area.

San Diego Viguiera

San Diego viguiera is a CRPR 4.3 species and is not an MSCP-covered species. San Diego viguiera is a California native shrub that naturally occurs in a somewhat narrow range in coastal Southern California (Calflora 2020). This species is typically found in chaparral and coastal sage scrub and naturally occurs at an elevation of 195 feet to 2,460 feet amsl.

There were 30 San Diego viguiera individuals observed in southern mixed chaparral and flat-topped buckwheat scrub on the eastern boundary of the study area.

San Diego Barrel Cactus

San Diego barrel cactus is a CRPR 2B.1 and MSCP-covered species. San Diego barrel cactus is a California native shrub (stem succulent) that naturally occurs in a narrow range within coastal San Diego County (Calflora 2020). This species is typically found in chaparral, grassland, coastal sage scrub, and vernal pool habitats and naturally occurs at an elevation of 5 feet to 1,475 feet amsl.

There were 94 San Diego barrel cactus individuals observed in mixed chaparral in the southeast portion of the study area.

Coulter's Goldfields

Coulter's goldfields is a CRPR 1B.1 species and is not an MSCP-covered species. Coulter's goldfields is a California native annual herb that naturally occurs in Southern and central California (Calflora 2020). This species is typically found in salt marsh, playa, coastal, and vernal pool habitats and naturally occurs at an elevation of 0 feet to 4,500 feet amsl.

A large population (approximately 700) of Coulter's goldfields individuals was observed within the disturbed herbaceous wetland (artificial) area in the northern portion of the study area. This population is not considered naturally occurring, as this population is a result of an artificial wetland created by adjacent development runoff.

Nuttall's Scrub Oak

Nuttall's scrub oak is a CRPR 1B.1 species and is not an MSCP-covered species. Nuttall's scrub oak is a California native shrub that occurs throughout the state near the coast (Calflora 2020). This species is typically found in chaparral and coastal sage scrub habitats and naturally occurs at an elevation of 45 feet to 1,310 feet amsl.

There were 1,181 Nuttall's scrub oak individuals observed throughout the study area in mixed chaparral, in sage scrub, and in the understory of eucalyptus woodland.

Wildlife Diversity

The project area supports habitat primarily for coastal sage scrub, chaparral, woodland, and wetland wildlife species throughout the project area. These habitats provide foraging and nesting habitat for migratory and resident bird species. Open habitats in the project area likely provide foraging opportunities for raptors. Areas of dense cover within vegetated communities in the project area also likely provide cover and foraging opportunities for small reptiles and other mammal species. Wetland areas may be suitable for certain amphibians and aquatic invertebrates.

A total of 42 wildlife species were recorded during focused surveys in the project area. Of the 42 wildlife species observed during field surveys, two are considered special status and are further described in Appendix D. A cumulative list of wildlife species observed in the project area during field surveys is provided in Appendix B of Appendix D.

Special-Status Wildlife

Special-status wildlife species are those listed as federally/state endangered or threatened, proposed for listing, fully protected by California Department of Fish and Wildlife (CDFW), on the California watch list, California Species of Special Concern, or MSCP-covered species.

Special-status wildlife species determined to have moderate potential to occur within the project area include coastal California gnatcatcher (*Polioptila californica californica*), orange-throated whiptail (*Aspidoscelis hyperythra*), red diamondback rattlesnake (*Crotalus ruber*), San Diego ringneck snake (*Diadophis punctatus similis*), two-striped gartersnake (*Thamnophis hammondii*), Dulzura pocket mouse (*Chaetodipus californicus femoralis*), northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), Crotch's bumble bee (*Bombus crotchii)* and San Diego desert woodrat (*Neotoma lepida intermedia*). These species are described in further detail in Appendix F of Appendix D.

Two special-status wildlife species, Cooper's hawk (*Accipiter cooperii*) and the San Diegan tiger whiptail (*Aspidoscelis tigris stejnegeri*), were directly observed in the project area during field surveys in 2020 and are described in detail below. In addition, although a coastal California gnatcatcher California Natural Diversity Database occurrence has been recorded within 1 mile of the project area to the east, and suitable habitat exists on the site, no coastal California gnatcatcher individuals were detected within the project area during focused protocol surveys in 2020. The project site gnatcatcher surveys are over 2 years old, and coastal California gnatcatcher is assumed present, as discussed below. Lastly, no suitable Hermes copper butterfly (*Lycaena hermes*) habitat was found within the project area during the focused habitat assessment conducted in spring 2020. The site provides moderate foraging and nesting habitat for Crotch's bumble bee, and this species is assumed present as discussed below. This bumble bee assessment is based on known occurrences within 5 miles of the site, the presence of blooming flowers/foraging habitat, and nesting resources including rodent burrows, bare ground, and fallen logs.

Cooper's Hawk

Cooper's hawk is a state watch list and MSCP-covered species. Cooper's hawks inhabit live oak, riparian deciduous, and other forest habitats near water. Nesting and foraging usually occur near open water or riparian vegetation. Nests are built in dense stands with moderate crown depths, usually in second-growth conifer or deciduous riparian areas. Nests in deciduous trees are typically located in crotches 20 feet to 50 feet above the ground; in conifers, nests are on horizontal branches or in the main crotch. Cooper's hawks use patchy woodlands and edges with snags for perching and hunting small birds, small mammals, reptiles, and amphibians (Zeiner et al. 1990). Cooper's hawks are diurnally active and are year-round residents. Breeding occurs from March through August, with peak activity in May through July. Males defend an area of about 330 feet around potential nest sites (Zeiner et al. 1990).

Cooper's hawk could use eucalyptus woodland on and near the site within the MHPA for nesting and scrub habitats for foraging. The species was observed on site during focused coastal California gnatcatcher surveys.

San Diegan Tiger Whiptail

The San Diegan tiger whiptail is a California Species of Special Concern and is not an MSCP-covered species. It is known to occupy hot and dry areas with sparse foliage, including chaparral, woodland, and riparian areas.

One San Diegan tiger whiptail individual was observed during focused coastal California gnatcatcher surveys. This individual is likely associated with mixed chaparral habitat throughout the project area.

Crotch's Bumble Bee

The site provides moderate foraging and nesting habitat for Crotch's bumble bee. This assessment is based on known occurrences within 5 miles of the site, the presence of blooming flowers/foraging habitat, and nesting resources including rodent burrows, bare ground, and fallen logs. A detailed habitat assessment including quantification of plant species in bloom, percent cover, plant diversity, and foraging resources has not been completed. As such the entire site is considered to have the potential to support foraging or nesting Crotch's bumble bee.

Coastal California Gnatcatcher

No coastal California gnatcatcher individuals were detected within the study area during focused protocol surveys in 2020; however, a coastal California gnatcatcher California Natural Diversity Database occurrence has been recorded within 1 mile of the study area to the east and suitable habitat exists on the site. Since more than 24 months have passed since focused surveys were conducted, this species is assumed to be present within suitable habitat both within and adjacent to the project parcel.

Wildlife Corridors and Habitat Linkages

Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the immigration and emigration of animals. Wildlife corridors contribute to population viability by (1) ensuring the continual exchange of genes between populations, which helps maintain genetic diversity; (2) providing access to adjacent habitat areas, representing additional territory for foraging and mating; (3) allowing for greater carrying capacity; and (4) providing routes for colonization of habitat lands following local population extinctions or habitat recovery from ecological catastrophes (e.g., fires).

Habitat linkages are patches of native habitat that function to join two larger patches of habitat. They serve as connections between habitat patches and help reduce the adverse effects of habitat fragmentation, representing a potential route for gene flow and long-term dispersal. Habitat linkages may serve both as habitat and as avenues of gene flow for small animals such as reptiles and amphibians. Habitat linkages may be represented by continuous patches of habitat or by nearby habitat "islands" that function as stepping stones for dispersal.

The project area, including the project impact footprint, contains relatively large patches of southern mixed chaparral and coastal sage scrub that have potential to provide refuge, cover, and foraging opportunities for mobile wildlife species that may be moving thorough the area. Given the residential development surrounding the entire project area, it is likely that birds would be the primary wildlife group that could use the site as a stepping-stone-type habitat linkage between the

expansive Scripps Ranch/Miramar open space to the southeast and the Peñasquitos Creek watershed to the northwest.

The MHPA within the project area is considered a biological core area but is not designated as a biological linkage per the MSCP (City of San Diego 1997). The project area is on the edge of a biological core area that is mostly within the City of Poway and unincorporated areas east of the project impact footprint but is connected by a linkage through Peñasquitos Creek to another biological core area to the west, in Peñasquitos Canyon and Lagoon.

Jurisdictional Resource Delineation

A formal jurisdictional delineation was completed in April 2020 that delineated areas under the jurisdiction of CDFW pursuant to Sections 1600–1603 of the California Fish and Game Code, under the jurisdiction of the U.S. Army Corps of Engineers (USACE) pursuant to Section 404 of the federal Clean Water Act (CWA), under the jurisdiction of the Regional Water Quality Control Board (RWQCB) pursuant to CWA Section 401 and the Porter–Cologne Water Quality Control Act, and wetlands defined under the City's Biology Guidelines (City of San Diego 2018a). Table 5.4-2 identifies the potential jurisdictional wetland resources.

Table 5.4-2
Potential Jurisdictional Wetland Resources in the Project Study Area[1]

Vegetation Community/ Land Cover Type	RWQCB Jurisdictional Resources (Acreage)	CDFW Jurisdictional Resources (Acreage)
Emergent wetland	0.41	0.41
Herbaceous wetland (artificial)	0.42	–
Natural Flood Channel	0.21	0.21
Total	**1.05**	**0.62**

Source: Appendix D

[1] No City of San Diego or U.S. Army Corps of Engineers jurisdictional areas exist on the project site.

The project parcel is not expected to support any USACE jurisdictional waters of the United States based on regulatory exclusions for artificial wetlands wholly excavated in pre-existing uplands and ephemeral drainages (i.e., non-relatively permanent waters). The limit of RWQCB jurisdictional areas include all natural flood channel, emergent wetland, and disturbed herbaceous wetland (artificial).

As discussed in Section 3.2.1 of Appendix D, none of the potential wetland features meet the City's wetland definition (City of San Diego 2018a). Based upon review of historical aerials (Appendix M of Appendix D), topography including U.S. Geological Survey 7.5-minute Poway quadrangle, and City permit records (Appendix N of Appendix D), the herbaceous wetland and emergent wetlands established as a result of the construction of adjacent residential development, an on-site artificial

impoundment, and historic artificial runoff from an off-site water tank. The natural flood channel areas on site would not support wetland dependent vegetation were it not for these human activities, which were not intended to create wetlands.

The results of the jurisdictional delineation are included below and in further detail in Appendix D.

5.4.2 REGULATORY FRAMEWORK

Federal

Federal Endangered Species Act

The federal Endangered Species Act (FESA) of 1973 (16 USC 1531 et seq.), as amended, is administered by the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service. This legislation is intended to provide a means to conserve the ecosystems upon which endangered and threatened species depend and provide programs for the conservation of those species, thus preventing extinction of plants and wildlife. Under provisions of Section 9 (16 USC 1538[a][1][B]) of FESA, it is unlawful to take any listed species. "Take" is defined in Section 3 (16 USC 1532[19]) of FESA as "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct."

FESA allows for the issuance of incidental take permits for listed species under Section 7, which is generally available for projects that also require other federal agency permits or other approvals, and under Section 10, which provides for the approval of habitat conservation plans on private property without any other federal agency involvement. "Incidental take" is defined as "take that results from, but is not the purpose of, carrying out an otherwise lawful activity" (USFWS 2019a). Upon development of a habitat conservation plan, USFWS can issue incidental take permits for listed species.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 USC 703 et seq.) is a federal statute that implements treaties with several countries on the conservation and protection of migratory birds. The number of bird species covered by the MBTA is extensive; the species are listed in Title 50 of the Code of Federal Regulations [CFR] Part 10.13. The regulatory definition of "migratory bird" is broad and includes any mutation or hybrid of a listed species, and also includes any part, egg, or nest of such birds (Title 50 CFR 10.12). Migratory birds are not necessarily federally listed endangered or threatened birds under FESA.

The MBTA prohibits the take of any migratory bird or any part, nest, or eggs of any such bird. Under the MBTA, "take" is defined as pursue, hunt, shoot, wound, kill, trap, capture, or collect, or any attempt to carry out these activities (16 USC 703 et seq.). In December 2017, Department of Interior Principal Deputy Solicitor Jorjani issued a memorandum (M-37050) that interprets the MBTA to only prohibit intentional take. Similarly, the Ninth Circuit Court of Appeals, like the Fifth Circuit and the Eighth Circuit, has held that the MBTA applies only to intended takes (see *Seattle Audubon Soc'y v. Evans*, 952 F.2d 297, 303 [9th Cir. 1991]). Unintentional or accidental take is not prohibited. Additionally, Executive Order 13186, Responsibilities of Federal Agencies to Protect Migratory Birds, requires that any project with federal involvement address impacts of federal actions on migratory birds with the purpose of promoting conservation of migratory bird populations (66 Federal Register 3853–3856). The executive order requires federal agencies to work with USFWS to develop a memorandum of understanding to promote the conservation of migratory bird populations. USFWS reviews actions that might affect these species. Compliance with this federal regulation is assumed; therefore, it is not considered in the remaining sections of this section.

Federal Wetland Regulation

Federal wetland regulation applicable to the project is guided by the CWA. The purpose of the CWA is to restore and maintain the chemical, physical, and biological integrity of all waters of the United States. Permitting for projects that propose dredge and fill activities in waters of the United States (including wetlands) is overseen by USACE under Section 404 of the CWA. Projects are typically permitted on an individual basis or are covered under one of several approved general or nationwide permits. In addition, under Section 401 of the CWA, an applicant for a federal permit for an activity that may result in a discharge to a water body must obtain certification from the state that the proposed activity would comply with state water quality standards and water quality objectives. Section 401 provides RWQCB with regulatory authority to certify or deny the proposed activity. A Section 401 Certification must be obtained from the RWQCB prior to issuance of a 404 Permit by USACE.

U.S. Army Corps of Engineers

Pursuant to Section 404 of the CWA, USACE regulates the discharge of dredged and/or fill material into "waters of the United States." The term "wetlands" (a subset of waters) is defined in Title 33 of the CFR Section 328.3(b) as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas." In the absence of wetlands, the limits of USACE jurisdiction in non-tidal waters, such as intermittent streams, extend to the "ordinary high water mark," which is defined in 33 CFR 328.3(e).

State

California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires identification of a project's potentially significant impacts on sensitive biological resources and feasible mitigation measures and alternatives that could avoid or reduce significant impacts. CEQA Guidelines Section 15380(b)(1) defines endangered animals or plants as species or subspecies whose "survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, disease, or other factors" (14 CCR 15000 et seq.). A rare animal or plant is defined in CEQA Guidelines Section 15380(b)(2) as a species that, although not presently threatened with extinction, exists "in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or . . . [t]he species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and may be considered 'threatened' as that term is used in the federal Endangered Species Act." Additionally, an animal or plant may be presumed to be endangered, rare, or threatened if it meets the criteria for listing, as defined further in CEQA Guidelines Section 15380(c). CEQA also requires identification of a project's potentially significant impacts on riparian habitats (such as wetlands, bays, estuaries, and marshes) and other sensitive natural communities, including habitats occupied by endangered, rare, and threatened species.

California Fish and Game Code

Under the California Fish and Game Code, CDFW provides protection from take for a variety of species, including fully protected species. "Fully protected" is a legal protective designation administered by CDFW intended to conserve wildlife species that risk extinction within California. Lists have been created for birds, mammals, fish, amphibians, and reptiles.

According to Sections 3511 and 4700 of the California Fish and Game Code, which regulate birds and mammals, respectively, a fully protected species may not be taken or possessed without a permit from the California Fish and Game Commission, and incidental takes of these species are not authorized.

According to Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto. Finally, Section 3513 states that is unlawful to take or possess any migratory nongame bird as

designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

For the purposes of these state regulations, CDFW currently defines an active nest as one that is under construction or in use and includes existing nests that are being modified. For example, if a hawk is adding to or maintaining an existing stick nest in a transmission tower, then it would be considered to be active and covered under these California Fish and Game Code sections. Compliance with these state regulations is assumed; therefore, they are not considered in the remaining sections of this section.

Local

City of San Diego Multiple Species Conservation Program Subarea Plan

Within the City of San Diego, the MSCP is implemented through the City of San Diego MSCP Subarea Plan (Subarea Plan) (City of San Diego 1997). The Subarea Plan encompasses 206,124 acres within the MSCP project area. The Subarea Plan area is characterized by urban land uses, with approximately three quarters of the area either built out or retained as open space/park system. The project area is located within the Urban Area of the Subarea Plan.

The MSCP established an MHPA preserve system designed to conserve large blocks of interconnected habitat having high biological value. The City MHPA is a hardline preserve developed by the City in cooperation with USFWS and CDFW, property owners, developers, and environmental groups. The MHPA identifies biological core resource areas and corridors targeted for conservation, in which only limited development may occur (City of San Diego 1997). The MHPA is considered an urban preserve that is constrained by existing or approved development and is composed of habitat linkages connecting several large core areas of habitat. The criteria used to define core and linkage areas involves maintaining ecosystem function and processes, including large animal movement. Each core area is connected to other core areas or to habitat areas outside the MSCP, either through common boundaries or through linkages. Core areas have multiple connections to help ensure that the balance in the ecosystem would be maintained (City of San Diego 1997). Critical habitat linkages between core areas are conserved in a functional manner, with a minimum of 75% of the habitat within identified linkages conserved (City of San Diego 1997). Urban habitat areas within the MHPA include existing designated open space such as Mission Bay, Tecolote Canyon, Marian Bear Memorial Park, Rose Canyon Open Space Park, San Diego River, the southern slopes along Mission Valley, Carroll and Rattlesnake Canyons, Florida Canyon, Chollas Creek, and a variety of smaller canyon systems. The Eastern area includes East Elliott and Mission Trails Regional Park.

The MHPA overlaps with 33.40 acres of the property parcel area, which is more than 75% of the total area. The MHPA also extends to adjacent lands outside the parcel boundary (Figure 5.4-1). The

adjacent MHPA habitat in the areas surrounding the parcel is composed of various non-linear patches that overlap with existing residential development in some sections.

Considering the project site location, the project is subject to the MHPA Land Use Adjacency Guidelines (LUAG), which can be found in Section 1.4.3 of the Subarea Plan (1997). As such, the following guidelines are applicable:

- ***Drainage*.** All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA.
- ***Toxics.*** Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA.
- ***Lighting.*** Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.
- ***Noise*.** Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.
- ***Barriers.*** New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.
- ***Invasives.*** No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.
- ***Brush Management.*** Development located adjacent to and topographically above the MHPA (e.g., along canyon edges) must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA.

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

City of San Diego Biology Guidelines

The City's Development Services Department developed the Biology Guidelines presented in the Land Development Manual "to aid in the implementation and interpretation of the Environmentally Sensitive Lands (ESL) Regulations, San Diego Land Development Code, Chapter 14, Division 1, Section 143.0101 et seq., and the Open Space–Residential (OR-1-2) Zone, Chapter 13, Division 2, Section 131.0201 et seq." (City of San Diego 2018a). The Biology Guidelines also provide standards for the determination of impact and mitigation under CEQA and the USFWS Candidate Conservation Agreement. Sensitive biological resources, as defined by the ESL Regulations, include lands within the MHPA, as previously discussed, as well as other lands outside the MHPA that contain wetlands; vegetation communities classifiable as Tier I, II, IIIA, or IIIB; habitat for rare, endangered, or threatened species; or narrow endemic species.

The City's definition of wetlands is broader than the definition applied by USACE. The City uses the criteria listed in Section 320.4(b)(2) of the USACE General Regulatory Policies (Title 33 CFR Parts 320–330) to apply an appropriate buffer around wetlands that serves to protect the function and value of the wetland. Guidelines that supplement the development regulation requirements described in this section are provided in the City's Biology Guidelines (City of San Diego 2018a). The informal jurisdictional delineation surveyed the entire project area and included a survey of a 100-foot buffer surrounding existing potential wetland habitat. According to the City's Biology Guidelines, a wetland buffer is an area surrounding a wetland that helps protect the function and value of the adjacent wetland by reducing physical disturbance, provides a transition zone where one habitat phases into another, and acts to slow floodwaters for flood and erosion control, sediment filtration, water purification, and groundwater recharge. The width of the buffer is determined by factors such as type and size of development, sensitivity of the wetland resource to edge effects, topography, and the need for upland transition (City of San Diego 2018a).

The San Diego Municipal Code also ranks upland habitat values by rarity and sensitivity. The most sensitive habitats are Tier I, and the least sensitive are Tier IV. The varying mitigation ratios and requirements that mitigation be either in tier or in kind are based on the sensitivity of the habitat being affected. The proposed project would redevelop an existing apartment complex and would not result in any new impacts to Tier I through IIIB habitats.

5.4.3 IMPACT ANALYSIS

5.4.3.1 Issues 1 and 2: Sensitive Habitats, and Special Status Plants and Wildlife

Issue 1: Would the project result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the California Department of Fish and Game (CDFG) or U.S. Fish and Wildlife Service (USFWS)?

Issue 2: Would the project result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFG or USFWS?

Thresholds

According to the City's Significance Determination Thresholds (City of San Diego 2022), potential impacts to biological resources are assessed through review of the project's consistency with the City's ESL Regulations, Biology Guidelines, and Subarea Plan. Before a determination of the significance of an impact can be made, the presence and nature of the biological resources must be established. Thus, significance determination, pursuant to the City's Significance Determination Thresholds, proceeds in two steps: (1) determine if significant biological resources are present; and (2) determine the sensitivity of identified biological resources in terms of direct, indirect, and cumulative impacts that would result from project implementation.

1. Sensitive biological resources are defined by the City of San Diego Municipal Code as:
    - Lands that have been included in the MHPA as identified in the City of San Diego MSCP Subarea Plan (City of San Diego 1997);
    - Wetlands (as defined by the Municipal Code, Section 113.0103);
    - Lands outside the MHPA that contain Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines (July 2002 or current edition) of the Land Development manual;
    - Lands supporting species or subspecies listed as rare, endangered, or threatened;
    - Lands containing habitats with narrow endemic species as listed in the Biology Guidelines of the Land Development manual; and
    - Lands containing habitats of covered species as listed in the Biology Guidelines of the Land Development manual.

2. Occurrence of any of the following situations associated with identified biological resources may indicate significant direct and indirect biological impacts.

A. Direct Impacts

- Any encroachment in the MHPA is considered a significant impact to the preservation goals of the MSCP. Any encroachment into the MHPA (in excess of the allowable encroachment by a project) would require a boundary adjustment, which would include a habitat equivalency assessment to ensure that what would be added to the MHPA is at least equivalent to what would be removed.
- Lands containing Tier I, II, IIIA, and IIIB habitats and all wetlands are considered sensitive and declining habitats. Impacts to these resources may be considered significant.
- Impacts to individual sensitive species, outside of any impacts to habitat, may also be considered significant based upon the rarity and extent of impacts. Impacts to State or Federally listed species and all narrow endemics should be considered significant.
- Certain species covered by the MSCP and other species not covered by the MSCP may be considered significant on a case-by-case basis taking into consideration all pertinent information regarding distribution, rarity, and the level of habitat conservation afforded by the MSCP.

B. Indirect Impacts

- The Significance Determination Thresholds indicate that depending on the circumstances, indirect effects of a project may be as significant as the direct effects of the project. Indirect effects include, but are not limited to, the following impacts:
  - Introduction of urban meso-predators into a biological system
  - Introduction of urban runoff into a biological system
  - Introduction of invasive exotic plant species into a biological system
  - Noise and lighting impacts
  - Alteration of a dynamic portion of a system, such as stream flow characteristics or fire cycles
  - Loss of a wetland buffer that includes no environmentally sensitive lands.

Impact Analysis

Direct Impacts

Vegetation Communities and Land Covers

Implementation of the project would result in direct permanent impacts to vegetation communities and land covers, including scrub oak chaparral, Diegan coastal sage scrub (including disturbed), Diegan coastal sage scrub (*Baccharis*-dominated), flat-topped buckwheat scrub, coastal sage–chaparral transition, southern mixed chaparral (including disturbed), eucalyptus woodland, disturbed habitat, developed land, *Arundo*-dominated disturbed habitat, herbaceous wetland (artificial), emergent wetland, and natural flood channel (Figure 5.4-1; Table 5.4-3). Impacts would occur from clearing, grading, and/or manufactured slope creation for development of the residential subdivision and associated features.

Additionally, there would be impacts associated with on-site mitigation implementation proposed to occur resulting from restoration, habitat creation, wetland enhancement, and wetland rehabilitation (Figure 5.4-3). Mitigation activities on the project site would result in impacts to urban/developed land, disturbed coastal sage scrub, disturbed habitat, eucalyptus woodland, and herbaceous wetland (artificial). These impacts are included in the acreages shown in Table 5.4-3 and described in detail in Appendices J and K of Appendix D.

Table 5.4-3
Direct Impacts to Vegetation Communities and Land Cover Types

Vegetation Community	Tier	Total Parcel (Acres)	Project Construction Footprint Impacts (Acres)[a]	Manufactured Slope Impacts (Acres)	Vegetated Stormwater Basin Impacts (Acres)	Zone 1 Impacts (Acres)	Additional Restoration Impacts (Acres)	Total Impacts (Acres)	No Impact (Acres)
Sensitive Upland Habitats (Tiers I – IIIA)									
Scrub oak chaparral	I	2.46	0.24	0.30	0.79	0.02	0	1.35	1.11
Diegan coastal sage scrub (including disturbed)	II	4.60	1.19	2.05	0.07	0.23	0.14	3.68	0.92
Diegan coastal sage scrub (*Baccharis*-dominated)	II	0.11	0	0	0	0	0.10	0.10	0
Flat-topped buckwheat scrub	II	2.41	1.98	0.06	0	0	0	2.04	0.37
Coastal sage–chaparral transition	II	4.08	3.5	0.36	0	0.22	0	4.08	0
Southern mixed chaparral (including disturbed)	IIIA	12.25	2.13	3.55	0.04	0.52	0.11	6.35	5.89
Subtotal Sensitive Uplands		*25.91*	*9.04*	*6.32*	*0.90*	*0.99*	*0.35*	*17.60*	*8.28*
None (Tier IV)									
Eucalyptus woodland	IV	3.58	0.4	1.53	0.02	0	1.65	3.60	0
Disturbed habitat	IV	6.96	4.49	0.97	0.18	0.23	0.51	6.38	0.57
Developed land	IV	2.34	2.17	0.16	0	0.02	0	2.35	0
Arundo-dominated disturbed habitat[b]	IV	0.74	0.51	0.15	0	0.07	0	0.73	0
Herbaceous wetland[b] (artificial)	IV	0.42	0	0.10	0	0	0.31	0.41	0.01
Emergent wetland[b]	IV	0.41	0.01	0.24	0	0.06	0	0.31	0.11

Table 5.4-3
Direct Impacts to Vegetation Communities and Land Cover Types

Vegetation Community	Tier	Total Parcel (Acres)	Project Construction Footprint Impacts (Acres)[a]	Manufactured Slope Impacts (Acres)	Vegetated Stormwater Basin Impacts (Acres)	Zone 1 Impacts (Acres)	Additional Restoration Impacts (Acres)	Total Impacts (Acres)	No Impact (Acres)
Natural flood channel[b]	IV	0.20	0.01	0.06	0	0.01	0	0.18	0.02
Subtotal Tier IV		*14.65*	*7.58*	*3.21*	*0.20*	*0.39*	*2.47*	*13.96*	*0.72*
Total		**40.56**	**16.63**	**9.63**	**1.10**	**1.38**	**2.82**	**31.59**	**9.00**

Source: Appendix D.

Notes:

[a] "Project Construction Footprint" includes impacts from housing, roads, and infrastructure pipelines.

[b] These areas do not meet the City's wetland definition.

Special-Status Plant Species

Five naturally occurring special-status plants were detected within the project area: Del Mar manzanita, San Diego viguiera, San Diego barrel cactus, Coulter's goldfields, and Nuttall's scrub oak. Table 5.4-4 lists the number of individuals of sensitive plants that would be directly impacted as part of the project, as well as additional special-status species that have not been detected in the project area, but that have a moderate possibility to occur.

Table 5.4-4
Direct Impacts to Special-Status Plants in the Project Study Area

Species	Status (Federal/State/CRPR/ City of San Diego MSCP)	Impacts (Number of Individuals)
Species Observed in the Project Study Area		
Del Mar manzanita	FE/None/1B.1/Covered	13
San Diego viguiera	None/None/4.3/None	0
San Diego barrel cactus	None/None/2B.1/Covered	92
Coulter's goldfields	None/None/1B.1/None	700*
Nuttall's scrub oak	None/None/1B.1/None	520
Species with Moderate Potential to Occur but Not Yet Detected in the Project Study Area		
Western spleenwort	None/None/4.2/None	N/A
Campbell's liverwort	None/None/1B.1/None	N/A
California adder's-tongue	None/None/4.2/None	N/A
Bottle liverwort	None/None/1B.1/None	N/A

Source: Appendix D

Notes: CRPR = California Rare Plant Rank; MSCP = Multiple Species Conservation Program.

* Impacts to Coulter's goldfields are primarily from wetland restoration activities. A small portion (less than 5%) of the population may be impacted by the proposed manufactured slope grading.

Status Definitions:

FE: Federally listed as endangered

CRPR 1B: Plants rare, threatened, or endangered in California and elsewhere

CRPR 2B: Plants rare, threatened, or endangered in California but more common elsewhere

CRPR 4: Watch List: Plants of limited distribution

.1 Seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat)

.2 Moderately threatened in California (20%–80% occurrences threatened/moderate degree and immediacy of threat)

.3 Not very threatened in California (<20% of occurrences threatened/low degree and immediacy of threat or no current threats known)

The following species with moderate potential to occur are CRPR 1B because they are rare within California: Nuttall's scrub oak, Campbell's liverwort, and bottle liverwort. These species have a relatively wide geographic range (i.e., multiple counties in Southern California).

The City's Biology Guidelines state that, "[i]n general, it is accepted that securing comparable habitat at the required ratio will mitigate for the direct impact to most sensitive species. While this is true for species with wide geographic distributions and/or large territory sizes, species with very limited geographic ranges (narrow endemic species) would require additional efforts designed to protect these species" (City of San Diego 2018a). Although Del Mar manzanita is not a narrow endemic species, it does have a restricted geographic range; therefore, species-specific mitigation is required. As detailed in the Upland Restoration Plan (Appendix J of Appendix D) and below, this species would be mitigated via habitat-based mitigation and translocated as a part of habitat restoration efforts.

Nuttall's scrub oak is not a covered or narrow endemic species, but is considered a CRPR 1B.1 species and is present throughout the project parcel where it would be directly impacted by the project. This species would be mitigated via habitat-based mitigation for scrub oak chaparral and southern mixed chapparal, as detailed in the Upland Restoration Plan (Appendix J of Appendix D) and below.

The other MSCP-covered species present in the study area is San Diego barrel cactus, which is considered a CRPR 2B.1 species and does have a relatively wide geographic distribution within San Diego County. Compliance with the MSCP LUAG would reduce and minimize edge effects and disturbance to this species, as discussed in Section 4.1.9.3 of Appendix D. Impacts would be mitigated through application of habitat-based compensatory mitigation. In addition, the project proposal includes translocation of the impacted 92 individuals (Figure 5.4-1; Appendix J of Appendix D). Refer to Appendix J of Appendix D and below for further details. The project site contains a population of Coulter's goldfield individuals, which is a CRPR 1B.1 species. This population is expected to benefit from wetlands restoration planned for this area (see Appendix K of Appendix D). While there are some risks that restoration may be unsuccessful or result in conversion to a wetland habitat type that is not as suitable for Coulter's goldfield, since the wetland habitat where this species is present (i.e., disturbed herbaceous wetland) was established artificially, the presence of this species is not considered naturally occurring.

The following species with moderate potential to occur are CRPR 4 because they are not under immediate threat: San Diego viguiera, western spleenwort, and California adder's-tongue.

Special-Status Wildlife Species

Special-status wildlife species present or determined to have a high or moderate potential to occur within the study area include Cooper's hawk, San Diegan tiger whiptail, coastal California gnatcatcher, orange-throated whiptail, red diamondback rattlesnake, San Diego ringneck snake, two-striped gartersnake, Dulzura pocket mouse, northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, Crotch's bumble bee, and San Diego desert woodrat (Appendix F of Appendix

D). Direct impacts to all species with moderate to high potential to occur would result from the loss of habitat and potential mortality during construction.

Non-listed special-status wildlife species, including but not limited to San Diegan tiger whiptail, orange-throated whiptail, red diamondback rattlesnake, San Diego ringneck snake, two-striped gartersnake, Dulzura pocket mouse, northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, and San Diego desert woodrat, all have a relatively wide distribution, and associated habitats could be impacted by general construction activities.

Direct impacts to coastal California gnatcatcher would occur through the removal of habitat and potential direct take outside the MHPA, despite the project's compliance with the LUAG and Area Specific Management Directives for the species. The Area Specific Management Directives for coastal California gnatcatcher include measures to reduce edge effects and minimize disturbance during the nesting period, fire protection measures to reduce the potential for habitat degradation due to unplanned fire, and management measures to maintain or improve habitat quality including vegetation structure (City of San Diego 1997). The project would comply with the fire protection measures identified in the fire fuel load modeling report (Appendix L3), such as the brush management plan. Edge effects to coastal California gnatcatcher would be reduced through the restoration of manufactured slopes and Tier IV habitat to native habitat and lack of a Zone 2 Brush Management Area and associated maintenance activities.

While a detailed habitat assessment for Crotch's Bumble Bee was not conducted, nesting and foraging habitat was assessed by the presence of blooming flowers, which is foraging habitat and nesting resources, including rodent burrows, bare grounds, and fallen logs. As the entire site has the potential to support foraging and nesting habitat, direct impacts to Crotch's bumble bee nesting and foraging habitat, with potential mortality, could occur from construction activities. The impact area supports over 17 acres of sensitive upland habitat with various blooming species that provide Crotch's bumble bee foraging habitat and various suitable ground nesting conditions such as rodent burrows and fallen logs, particularly within the over 3 acres of eucalyptus woodland.

Non-Special-Status Birds (MBTA)

Migratory bird species are protected under the MBTA (16 USC 703–712), and all nesting birds, including raptors, are also afforded protection under California Fish and Game Code Sections 3503 and 3503.5. Non-special-status birds and raptors, including Cooper's hawk, may nest within the project area. Because a portion of the proposed project impact footprint would occur adjacent to the MHPA, the project is required to document compliance with the City's MSCP LUAG. The LUAG requires that "excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species" (City of San

Diego 1997). Direct impacts to active nests protected under the California Fish and Game Code Sections 3503 and 3503.5 would be avoided entirely through compliance with these regulations.

Indirect Impacts

Vegetation Communities and Land Cover

Seven native vegetation communities were mapped directly adjacent in the vicinity of the project construction footprint: Diegan coastal sage scrub, coastal sage–chaparral transition, southern mixed chaparral, flat-topped buckwheat, emergent wetland, and scrub oak chaparral. In addition, the majority of eucalyptus woodland present would be restored to native upland vegetation communities (Appendix J of Appendix D). Short-term indirect impacts that may affect these adjacent vegetation communities include dust, erosion, invasive plant species, temporary access impacts, and increased human presence. These short-term indirect impacts would be avoided through project compliance with National Pollutant Discharge Elimination System regulations, incorporation of appropriate best management practices (BMPs) during construction (e.g., fiber rolls, dust control, biological monitoring, treatment of equipment for invasive species control, temporary site fencing), installation of permanent BMPs per the City's Storm Water Standards Manual (City of San Diego 2018b), and preparation and implementation of a project-specific stormwater pollution prevention plan. A Stormwater Quality Management Plan was prepared for the project and is included in Appendix S. Site-specific source control BMPs include prevention of illicit discharges, storm drain stenciling, integrated pest management principles, and efficient landscape and irrigation design. In addition, water quality treatment BMPs selected for the project would include proposed multiple lined biofiltration basins to be located in the western and northern portions of the project site. The project would include standard dust control measures as required by the San Diego Air Pollution Control District Rule 55 that would minimize dust impacts to vegetation. The project would be required to include a qualified biologist present to supervise the flagging of sensitive resources prior to construction and provide environmental training and during construction to ensure no unauthorized impacts occur. These standard measures would be implemented via conditions of approval.

The potential long-term indirect impacts of the project would be from noise, lighting, invasive species introduction, erosion, effects to water quality, and increased human presence adjacent to the MHPA from residential activities and common associated activities. It is assumed that any noise impacts would likely be intermittent and below the 60 A-weighted decibel hourly threshold for impacts to special-status wildlife inhabiting adjacent vegetation. All new lighting would be confined to the project construction footprint and would be required to be shielded or directed away from the MHPA and native habitats. In order to reduce the introduction of invasive species, the project includes a landscape plan that does not include plant species identified by the California Invasive

Plant Council (GMP 2023). Within the on-site open space that would be retained as MHPA after construction, invasive species already present shall be entirely removed where feasible, and the removal shall be monitored by a Qualified Monitoring Biologist, as defined in the City's Biology Guidelines (City of San Diego 2018a), to ensure that dispersal of propagules (e.g., seeds, stems) is avoided or minimized. The remaining open space areas would also be managed by the City in perpetuity, which would include invasive species treatment. If aboveground plant material cannot be removed (e.g., due to limited access), herbicides shall be applied by a licensed applicator, using chemicals permitted as safe within aquatic environments. Effects from erosion and water quality treatment changes would be reduced through the project's stormwater design as storm water conveyance would be directed and treated according to the Priority Development Project Storm Water Quality Management Plan (Appendix I1). Drainage from the project construction footprint would be intercepted and conveyed via a public storm drain system into two vegetated stormwater basins in the northwest portion of the project. A final layer of gravel would control water infiltration rates into a pipe prior to the water flowing through a pipe below the ground-level of manufactured slopes and discharging into the emergent wetland habitat to the southwest and herbaceous wetland (artificial) to the northeast, where a small rip rap pad would control flow rates. The increase in human presence would be limited to the boundaries of the development (see Section 4.1.5 of Appendix D), and no additional human access or encroachment into the native vegetation is expected (e.g., no trails would be included outside the project construction footprint within native habitats). The project would further be required to demonstrate compliance with the City's MSCP LUAG (see Section 4 of Appendix D), which would provide a further reduction in indirect impacts to vegetation communities within the MHPA, including prevention of toxic or harmful runoff. Refer to Section 4.1 of Appendix D for additional details.

Special-Status Plant Species

Potential indirect impacts to off-site special-status plant species would be similar to those previously described for vegetation communities (e.g., increased human presence, dust). These indirect impacts to off-site special-status plant species would be reduced by measures included in the project design (including the wetland buffer and transitional wetland habitat); project compliance with National Pollutant Discharge Elimination System regulations; incorporation of appropriate BMPs during construction (e.g., fiber rolls); installation permanent BMPs in accordance with the City's Storm Water Standards Manual (City of San Diego 2018b); preparation and implementation of a project-specific stormwater pollution prevention plan; and implementation of standard construction protection measures, which includes having a qualified biologist present to supervise flagging of sensitive resources prior to construction, provide environmental training, and ensure no unauthorized impacts occur during construction as part of a condition of project approval.

Special-Status Wildlife Species

Most of the indirect impacts to vegetation communities previously described can also affect special-status wildlife. Wildlife may also be indirectly affected in the short term by construction-related noise, which can disrupt normal activities and subject wildlife to higher predation risks. Adverse edge effects can cause degradation of habitat quality through the invasion of pest species. Breeding birds can be significantly affected by short-term construction-related noise, which can result in the disruption of foraging, nesting, and reproductive activities.

If project grading or construction occurs during the breeding season for Cooper's hawk and coastal California gnatcatcher (February 1 through September 15), the project could impact these species. Specifically, construction noise levels above 60 decibels may impact nesting coastal California gnatcatchers. The MSCP conditions of coverage and the LUAG for coastal California gnatcatcher require minimizing disturbance during the nesting period of this species within the MHPA. The project restoration activities within the MHPA also have the potential to indirectly impact coastal California gnatcatcher. The Biology Guidelines require a 300-foot construction buffer from active Cooper's hawk nests, which indicates construction within this 300-foot buffer may impact nesting. Thus, the project would potentially impact nesting Cooper's hawk.

Significance of Impact

Direct Impacts

Vegetation Communities and Land Covers

According to the City's Significance Determination Thresholds (City of San Diego 2022), impacts of more than 0.1 acres to upland habitats (Tiers I–IIIB) are considered significant and require mitigation. The project would result in direct impacts to 17.60 acres of Tier I-IIIB habitats, including the following: Tier I uplands: scrub oak chaparral (1.35 acres); Tier II uplands: Diegan coastal sage scrub (including disturbed), Diegan coastal sage scrub, coastal sage–chaparral transition, and flat-topped buckwheat scrub (9.9 acres); and Tier IIIA: southern mixed chaparral (including disturbed) (6.35 acres). Impacts to these sensitive upland vegetation communities would be potentially significant.

The project development would result in impacts to 13.96 acres of Tier IV upland habitats consisting of disturbed habitat, eucalyptus woodland, urban/developed land, *Arundo*-dominated disturbed habitat, emergent wetland, herbaceous wetland (artificial), and natural flood channel. All impacts to vegetation communities and land covers from the implementation of the on-site mitigation would be to Tier IV habitats. Impacts to Tier IV upland habitats would be less than significant.

Special-Status Plant Species

The project would impact 13 Del Mar Manzanita individuals, 92 San Diego barrel cactus individuals and 520 Nuttall's scrub oak individuals. Impacts to Del Mar manzanita, San Diego barrel cactus and Nuttall's scrub oak special-status plant species are potentially significant. The project would impact a large population (approximately 700) of Coulter's goldfields, but the wetland habitat where this species is present was established artificially, so the species is not considered naturally occurring, and impacts from manufactured slopes grading and restoration to Coulter's goldfields would be less than significant. No impact would occur to San Diego viguiera.

Special-Status Wildlife Species

The project would result in direct impacts to San Diegan tiger whiptail, orange-throated whiptail, Crotch's bumble bee (foraging habitat), red diamondback rattlesnake, San Diego ringneck snake, two-striped gartersnake, Dulzura pocket mouse, northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, Cooper's hawk, and San Diego desert woodrat due to loss of habitat. Impacts to special-status wildlife species due to the loss of habitat are potentially significant. While there is a potential for these non-listed special-status wildlife species to face direct mortality due to construction activities, these impacts are less than significant as most individuals are mobile and would be able to avoid mortality, and the loss of some local individuals of these species is not expected to result in adverse effect on the regional populations of these species given that they are relatively widespread, compared with listed species.

The project could result in direct impacts to nesting Cooper's hawk. Direct impacts to Cooper's hawk active nests would be potentially significant.

The coastal California gnatcatcher is assumed to be present within suitable habitat both within and adjacent to the project parcel. Direct impacts to coastal California gnatcatcher would be potentially significant considering restoration activities would occur inside the MHPA.

The project could result in direct impacts to nesting and foraging Crotch's bumble bee. Direct impacts to Crotch's bumble bee nesting and foraging habitat would be potentially significant.

Indirect Impacts

Vegetation Communities and Land Covers

Impacts to vegetation communities and land covers would be reduced through project implementation of standard construction measures as part of a condition of project approval. Indirect impacts to vegetation communities and land covers would be less than significant.

Special-Status Plants

Impacts to special-status plant species would be reduced through project implementation of standard construction protection measures as part of a condition of project approval. Indirect impacts to special-status plants would be less than significant.

Special-Status Wildlife Species

Indirect impacts to Cooper's hawk would be potentially significant if construction occurs within 300 feet of an active nest. Indirect impacts to nesting coastal California gnatcatcher within the MHPA would also be potentially significant.

Mitigation Measures

MM-BIO-1 **Upland Mitigation.** Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Permits, and Building Permits by the City of San Diego (City), the Owner/Permittee shall mitigate for the loss of 1.35 acres of Tier I habitat, 9.90 acres of Tier II habitat, and 6.35 acres of Tier IIIA habitat by providing a minimum of 1.65 acres of Tier I habitat, 9.90 acres of Tier II habitat, and 4.88 acres of Tier IIIA habitat mitigation, through a combination of on-site preservation and on-site revegetation (i.e., creation, restoration, and enhancement).

On-Site Preservation. The Owner/Permittee shall preserve 7.97 acres within the Multi-Habitat Planning Area (MHPA) that support 1.11 acres of Tier I habitat, 1.23 acres of Tier II habitat, and 5.63 acres of Tier IIIA habitat. The on-site preserved habitat provided to satisfy upland mitigation requirements shall be dedicated to the City with a maintenance endowment and managed in perpetuity by the City as part of the MHPA preserve system.

On-Site Creation, Restoration, and Enhancement. Prior to the issuance of any construction permits, including but not limited to the first Grading Permit, Demolition Permit, and Building Permit, the Assistant Deputy Director (ADD) environmental designee of the City's Land Development Review Division (LDR) shall verify that the following statement is shown on the grading and/or construction plans as a note under the heading Environmental Requirements: "Renzulli Estates Project is subject to the Mitigation Monitoring and Reporting Program (MMRP) and shall conform to the mitigation conditions as contained in the Environmental Impact Report PRJ-0674401 / State Clearinghouse No. 2022040125."

Prior to Permit Issuance

A. Land Development Review (LDR) Plan Check

1. Prior to the issuance of any construction permits, including but not limited to the first Grading Permit, Demolition Permit, and Building Permit, whichever is applicable, the ADD environmental designee shall verify that the requirements for the revegetation/restoration plans and specifications, including 4.57 acres of creation and restoration of coastal sage scrub (Tier II), 0.54 acres of scrub oak chaparral (Tier I) restoration, 4.51 acres of coastal sage scrub/chaparral (Tier II) restoration, 0.52 acres of southern mixed chaparral (Tier IIIA) restoration, and 0.11 acres of southern mixed chaparral (Tier IIIA) enhancement. The restoration, creation, and enhancement shall be shown and noted on the appropriate landscape construction documents. The landscape construction documents and specifications must be found to be in conformance with the On-site Upland Restoration Plan prepared by Dudek May 2025, the requirements of which are summarized below:

B. Restoration Plan(s) and Specifications

1. Landscape Construction Documents (LCDs) shall be prepared on D-sheets and submitted to the City of San Diego Development Services Department, Landscape Architecture Section (LAS) for review and approval. LAS shall consult with Mitigation Monitoring Coordination (MMC) and obtain concurrence prior to approval of LCD. The LCD shall consist of revegetation/restoration, planting, irrigation, and erosion control plans; including all required graphics, notes, details, specifications, letters, and reports as outlined below.

2. Landscape Revegetation/Restoration Planting and Irrigation Plans shall be prepared in accordance with the City's Land Development Code (LDC) Chapter 14, Article 2, Division 4, the LDC Landscape Standards submittal requirements, and Attachment B (General Outline for Revegetation/Restoration Plans) of the City Biology Guidelines. The Principal Qualified Biologist (PQB) shall identify and adequately document all pertinent information concerning the revegetation/restoration goals, such as but not limited to, plant/seed palettes, the timing of installation, plant installation specifications, method of watering, protection of adjacent habitat, erosion and sediment control, performance/success criteria, inspection schedule by

City staff, document submittals, reporting schedule, etc. The LCD shall also include comprehensive graphics and notes addressing the ongoing maintenance requirements (after final acceptance by the City).

3. The Revegetation Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Construction Manager (CM), and Grading Contractor (GC), where applicable, shall be responsible for ensuring that all grading and contouring, clearing and grubbing, installation of plant materials, and any necessary maintenance activities or remedial actions required during installation and the 120-day plant establishment period are completed per approved LCD. The following procedures, at a minimum, but not limited to, shall be performed:

    a. The RMC shall be responsible for the maintenance of the upland mitigation area for a minimum period of 120 days. Maintenance visits shall be conducted on a minimum monthly basis throughout the plant establishment period.

    b. At the end of the 120-day period, the PQB shall review the mitigation area to assess the completion of the short-term plant establishment period and shall submit a report for approval by MMC.

    c. MMC will provide approval in writing to begin the 5-year long-term establishment/maintenance and monitoring program.

    d. Existing indigenous/native species shall not be pruned, thinned, or cleared in the revegetation/mitigation area.

    e. The revegetation site shall not be fertilized.

    f. The RIC is responsible for reseeding (if applicable) if weeds are not removed, within 1 week of written recommendation by the PQB.

    g. Weed control measures shall include the following: (1) hand removal, (2) cutting with power equipment, and (3) chemical control. Hand removal of weeds is the most desirable method of control and shall be used wherever possible.

    h. Damaged areas shall be repaired immediately by the RIC/RMC. Insect infestations, plant diseases, herbivory, and other pest problems shall be closely monitored throughout the 5-year maintenance period. Protective mechanisms such as metal wire netting shall be used as necessary. Diseased and infected

plants shall be immediately disposed of off site in a legally acceptable manner at the discretion of the PQB or Qualified Biological Monitor (QBM) (City approved). Where possible, biological controls shall be used instead of pesticides and herbicides.

4. If a brush management program is required, the revegetation/restoration plan shall show the dimensions of each brush management zone. Notes shall be provided describing the restrictions on planting and maintenance and identifying that the area is impact neutral and shall not be used for habitat mitigation/credit purposes.

C. Letters of Qualification Have Been Submitted to ADD

1. The applicant shall submit, for approval, a letter verifying the qualifications of the biological professional to MMC. This letter shall identify the PQB, Principal Restoration Specialist (PRS), and QBM, where applicable, and the names of all other persons involved in the implementation of the revegetation/restoration plan and biological monitoring program, as they are defined in the City Biological Review References. Resumes and the biology worksheet should be updated annually.
2. MMC will provide the applicant with documentation confirming the qualifications of the PQB/PRS/QBM and all City-approved persons involved in the revegetation/restoration plan and biological monitoring of the project.
3. Prior to the start of work, the applicant must obtain approval from MMC for any personnel changes associated with the revegetation/restoration plan and biological monitoring of the project.
4 PQB must also submit evidence to MMC that the PQB/QBM has completed Storm Water Pollution Prevention Program (SWPPP) training.

Prior to Start of Construction

A. PQB/PRS Shall Attend Pre-Construction (Precon) Meetings

1. Prior to beginning any work that requires monitoring:

a. The Owner/Permittee or their authorized representative shall arrange a Precon Meeting that shall include the PQB or PRS,

Construction Manager (CM) and/or Grading Contractor (GC), Landscape Architect (LA), Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC.

b. The PQB shall also attend any other grading/excavation-related Precon Meetings to make comments and/or suggestions concerning the revegetation/restoration plan(s) and specifications with the RIC, CM, and/or GC.

c. If the PQB is unable to attend the Precon Meeting, the Owner shall schedule a focused Precon Meeting with MMC, PQB/PRS, CM, BI, LA, RIC, RMC, RE and/or BI, if appropriate, prior to the start of any work associated with the revegetation/ restoration phase of the project, including site grading preparation.

2. Where Revegetation/Restoration Work Will Occur

a. Prior to the start of any work, the PQB/PRS shall also submit a revegetation/restoration monitoring exhibit (RRME) based on the appropriate reduced LCD (reduced to 11″ × 17″ format) to MMC and the RE, identifying the areas to be revegetated/restored, including the delineation of the limits of any disturbance/grading and any excavation.

b. PQB shall coordinate with the construction superintendent to identify appropriate best management practices (BMPs) on the RRME.

3. When Biological Monitoring Will Occur

a. Prior to the start of any work, the PQB/PRS shall also submit a monitoring procedures schedule to MMC and the RE indicating when and where biological monitoring and related activities will occur.

4. PQB Shall Contact MMC to Request Modification

a. The PQB may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the revegetation/restoration plans and specifications. This request shall be based on relevant information (such as other sensitive species not listed by federal and/or state agencies and/or not covered by the MSCP and to which any impacts may be

considered significant under CEQA) which may reduce or increase the potential for biological resources to be present.

During Construction

A. PQB or QBM Present During Construction/Grading/Planting

1. The PQB or QBM shall be present full-time during construction activities including but not limited to, site preparation, clearing, grading, excavation, landscape establishment in association with on-site native habitat revegetation activity which could result in impacts to sensitive biological resources as identified in the LCD and on the RRME. The RIC and/or QBM are responsible for notifying the PQB/PRS of changes to any approved construction plans, procedures, and/or activities. The PQB/PRS is responsible for notifying the CM, LA, RE, BI, and MMC of the changes.

2. The PQB or QBM shall document field activity via the Consultant Site Visit Record Forms (CSVR). The CM shall provide the CSVRs on the first day of monitoring, the last day of monitoring, monthly, and in the event of a deviation from conditions identified within the LCD and/or biological monitoring program. The RE shall forward copies to MMC.

3. The PQB or QBM shall be responsible for maintaining and submitting the CSVR at the time that CM responsibilities end (i.e., upon the completion of construction activity other than that associated with biology).

4. All construction activities (including staging areas) shall be restricted to the development areas as shown on the LCD. The PQB/PRS or QBM staff shall monitor construction activities as needed, with MMC concurrence on method and schedule. This is to ensure that construction activities do not encroach into biologically sensitive areas beyond the limits of disturbance as shown on the approved LCD.

5. The PQB or QBM shall supervise the placement of orange construction fencing or City approved equivalent, along the limits of potential disturbance adjacent to (or at the edge of) all sensitive habitats (coastal sage scrub [Tier II], scrub oak chaparral [Tier I], and southern mixed chaparral [Tier IIIA]), as shown on the approved LCD.

6. The PQB shall provide a letter to MMC that limits of potential disturbance have been surveyed and staked, and that the construction fencing is installed properly.

7. The PQB or QBM shall oversee the implementation of BMPs, such as gravel bags, straw logs, silt fences, or equivalent erosion control measures, as needed to ensure the prevention of any significant sediment transport. In addition, the PQB/QBM shall be responsible for verifying the removal of all temporary construction BMPs upon completion of construction activities. Removal of temporary construction BMPs shall be verified in writing on the final construction phase CSVR.

8. PQB shall verify in writing on the CSVR's that no trash stockpiling or oil dumping, fueling of equipment, storage of hazardous wastes or construction equipment/material, parking, or other construction-related activities shall occur adjacent to sensitive habitat. These activities shall occur only within the designated staging area located outside the area defined as a biologically sensitive area.

9. The long-term establishment inspection and reporting schedule per LCD must all be approved by MMC prior to the issuance of the Notice of Completion (NOC) or any bond release.

B. Disturbance/Discovery Notification Process

1. If unauthorized disturbances occur or sensitive biological resources are discovered that were not previously identified on the LCD and/or RRME, the PQB or QBM shall direct the contractor to divert construction in the area of disturbance or discovery temporarily and immediately notify the RE or BI, as appropriate.

2. The PQB shall also immediately notify MMC by telephone of the disturbance, report the nature and extent of the disturbance, and recommend the method of additional protection, such as fencing and appropriate Best Management Practices (BMPs). After obtaining concurrence with MMC and the RE, PQB and CM shall install the approved protection and agreement on BMP's.

3. The PQB shall also submit written documentation of the disturbance to MMC within 24 hours by email with photos of the resource in context (e.g., showing adjacent vegetation).

C. Determination of Significance

1. The PQB shall evaluate the significance of disturbance and/or discovered biological resource and provide a detailed analysis and recommendation in a letter report with the appropriate photo documentation to MMC to obtain concurrence and formulate a plan of action which can include fines, fees, and supplemental mitigation costs.

2. MMC shall review this letter report and provide the RE with MMC's recommendations and procedures.

Post-Construction

A. Mitigation Monitoring and Reporting Period

1. Five-Year Mitigation Establishment/Maintenance Period

a. The RMC shall be retained to complete maintenance monitoring activities throughout the five-year mitigation monitoring period.

b. Maintenance visits will be conducted monthly for the first 3 years, quarterly from July to December in the second and third years, and quarterly thereafter.

c Maintenance activities will include all items described in the LCD.

d. Plant replacement will be conducted as recommended by the PQB (note: plants shall be increased in container size relative to the time of initial installation or establishment or maintenance period may be extended to the satisfaction of MMC).

2. Five-Year Biological Monitoring

a. All biological monitoring and reporting shall be conducted by a PQB or QBM, as appropriate, consistent with the LCD.

b. Monitoring shall involve both qualitative horticultural monitoring and quantitative monitoring (i.e., performance/success criteria). Horticultural monitoring shall focus on soil conditions (e.g., moisture) and fertility, container plant health, seed germination rates, presence of native and non-native (e.g., invasive exotic) species, any significant disease or pest problems, irrigation repair and scheduling, trash removal, illegal trespass, and any erosion problems.

c. After plant installation is complete, qualitative monitoring surveys will occur monthly for the first year, monthly from January to June of the second and third years, quarterly from July to December in the second and third years, and quarterly thereafter.

d. Upon the completion of the 120-day short-term plant establishment period, quantitative monitoring surveys shall be conducted at 12, 24, 36, 48, and 60 months by the PQB or QBM. The revegetation/restoration effort shall be quantitatively evaluated once per year (in spring) during years one through five, to determine compliance with the performance standards identified on the LCD. All plant material must have survived without supplemental irrigation for the last two years.

e. Quantitative monitoring shall include the use of fixed transects and photo points to determine the vegetative cover within the revegetated habitat. Collection of fixed transect data within the revegetation/restoration site shall result in the calculation of native species richness, percent cover, relative to the reference site, of target vegetation, and percent total cover of non-native/noninvasive vegetation. Container plants will also be counted to determine percent survivorship. The data will be used to determine the attainment of performance/success criteria identified within the LCD.

f. The biological monitoring requirements may be reduced if the revegetation meets the fifth-year criteria before the end of the fifth year and the irrigation has been terminated for the last two years.

g. The PQB or QBM shall oversee the implementation of post-construction BMPs, such as gravel bags, straw logs, silt fences, or equivalent erosion control measures, as needed to ensure the prevention of any significant sediment transport. In addition, the PQB/QBM shall be responsible for verifying the removal of all temporary post-construction BMPs upon completion of construction activities. Removal of temporary post-construction BMPs shall be verified in writing on the final post-construction phase CSVR.

B. Submittal of Draft Monitoring Report

1. A draft monitoring letter report shall be prepared to document the completion of the 120-day plant establishment period. The report shall include a discussion of weed control, horticultural treatments (pruning, mulching, and disease control), erosion control, trash/debris removal, replacement planting/reseeding, site protection/signage, pest management, vandalism, and irrigation maintenance. The revegetation/restoration effort shall be visually assessed at the end of the 120-day period to determine individual mortality.

2. The PQB shall submit two copies of the Draft Monitoring Report which describes the results, analysis, and conclusions of all phases of the Biological Monitoring and Reporting Program (with appropriate graphics) to MMC for review and approval within 30 days following the completion of monitoring. Monitoring reports shall be prepared on an annual basis for a period of five years. Site progress reports shall be prepared by the PQB following each site visit and provided to the Owner, RMC, and RIC. Site progress reports shall review maintenance activities (qualitatively and quantitatively when appropriate), monitoring results including progress of the revegetation relative to the performance/success criteria, and the need for any remedial measures.

3. Draft annual reports (three copies) summarizing the results of each progress report, including quantitative monitoring results and photographs taken from permanent viewpoints, shall be submitted to MMC for review and approval within 30 days following the completion of monitoring.

4. MMC shall return the Draft Monitoring Report to the PQB for revision or, for preparation of each report.

5. The PQB shall submit a revised Monitoring Report to MMC (with a copy to RE) for approval within 30 days.

6. MMC will provide written acceptance of the PQB and RE of the approved report.

C. Final Monitoring Reports(s)

1. PQB shall prepare a Final Monitoring upon achievement of the fifth-year performance/success criteria and completion of the five-year maintenance period.

a. This report may be issued before the end of the fifth year if the revegetation meets the fifth-year performance /success criteria and the irrigation has been terminated for the last two years.

b. The Final Monitoring report shall be submitted to MMC for evaluation of the success of the mitigation effort and final acceptance. At this time, a request for a pre-final inspection shall be submitted; MMC will schedule after reviewing the report.

c. If at the end of the five years, any of the revegetated areas fails to meet the project's final success standards, the applicant must consult with MMC. This consultation shall take place to determine whether the revegetation effort is acceptable. The applicant understands that failure of any significant portion of the revegetation/restoration area may result in a requirement to replace or renegotiate that portion of the site and/or extend the monitoring and establishment/maintenance period until all success standards are met.

MM-BIO-2 **On-Site Sensitive Plant Mitigation.** Prior to the issuance of any construction permits, including but not limited to the first Grading Permit, Demolition Permit, and Building Permit, the Assistant Deputy Director (ADD) environmental designee of the City's Land Development Review Division (LDR) shall verify that the following statement is shown on the grading and/or construction plans as a note under the heading Environmental Requirements: "Renzulli Estates Project is subject to the Mitigation Monitoring and Reporting Program (MMRP) and shall conform to the mitigation conditions as contained in the Environmental Impact Report PRJ-0674401/State Clearinghouse No. 2022040125."

Prior to Permit Issuance

A. Land Development Review (LDR) Plan Check

1. Prior to the issuance of any construction permits, including but not limited to the first Grading Permit, Demolition Permit, and Building Permit, whichever is applicable, the ADD environmental designee shall verify that the requirements for sensitive plant species restoration, specifically a minimum survivorship of a minimum of 26 Del Mar manzanita individuals (cuttings from impacted individuals to be propagated and used in on-site restoration), a minimum survivorship of 520 Nuttall's scrub oak (cuttings from impacted individuals to be

propagated and used in on-site restoration), and a minimum survivorship of 92 barrel cactus (impacted individuals to be salvaged and translocated in on-site restoration), shall be shown and noted on the appropriate landscape construction documents. The landscape construction documents and specifications must be found to be in conformance with the On-site Upland Restoration Plan prepared by Dudek May 2025, the requirements of which are summarized below:

B. Revegetation/Restoration Plan(s) and Specifications

1. Landscape Construction Documents (LCD) shall be prepared on D-sheets and submitted to the City of San Diego Development Services Department, Landscape Architecture Section (LAS) for review and approval. LAS shall consult with Mitigation Monitoring Coordination (MMC) and obtain concurrence prior to approval of LCD. The LCD shall consist of revegetation/restoration, planting, irrigation, and erosion control plans; including all required graphics, notes, details, specifications, letters, and reports as outlined below.

2. Landscape Revegetation/Restoration Planting and Irrigation Plans shall be prepared in accordance with the City's Land Development Code (LDC) Chapter 14, Article 2, Division 4, the LDC Landscape Standards submittal requirements, and Attachment "B" (General Outline for Revegetation/Restoration Plans) of the City Biology Guidelines. The Principal Qualified Biologist (PQB) shall identify and adequately document all pertinent information concerning the revegetation/restoration goals and, such as but not limited to, plant/seed palettes, the timing of installation, plant installation specifications, method of watering, protection of adjacent habitat, erosion, and sediment control, performance/success criteria, inspection schedule by City staff, document submittals, reporting schedule, etc. The LCD shall also include comprehensive graphics and notes addressing the ongoing maintenance requirements (after final acceptance by the City).

3. The Revegetation Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Construction Manager (CM) and Grading Contractor (GC), where applicable shall be responsible for ensuring that all grading and contouring, clearing, and grubbing, installation of plant materials, and any necessary maintenance activities or remedial actions required during installation and the 120-day plant establishment period are done per approved LCD. The following procedures at a minimum, but not limited to, shall be performed:

a. The RMC shall be responsible for the maintenance of the sensitive plant restoration areas for a minimum period of 120 days. Maintenance visits shall be conducted on a minimum monthly basis throughout the plant establishment period.

b. At the end of the 120-day period, the PQB shall review the mitigation area to assess the completion of the short-term plant establishment period and submit a report for approval by MMC.

c. MMC will provide approval in writing to begin the five-year long-term establishment/maintenance and monitoring program.

d. Existing indigenous/native species shall not be pruned, thinned, or cleared in the revegetation/mitigation area.

e. The revegetation site shall not be fertilized.

f. The RIC is responsible for reseeding (if applicable) if weeds are not removed, within one week of written recommendation by the PQB.

g. Weed control measures shall include the following: (1) hand removal, (2) cutting, with power equipment, and (3) chemical control. Hand removal of weeds is the most desirable method of control and will be used wherever possible.

h. Damaged areas shall be repaired immediately by the RIC/RMC. Insect infestations, plant diseases, herbivory, and other pest problems will be closely monitored throughout the five-year maintenance period. Protective mechanisms such as metal wire netting shall be used as necessary. Diseased and infected plants shall be immediately disposed of off-site in a legally acceptable manner at the discretion of the PQB or Qualified Biological Monitor (QBM) (City approved). Where possible, biological controls will be used instead of pesticides and herbicides.

4. If a Brush Management Program is required the revegetation/restoration plan shall show the dimensions of each brush management zone. Notes shall be provided describing the restrictions on planting and maintenance and identify that the area is impact neutral and shall not be used for habitat mitigation/credit purposes.

C. Letters of Qualification Have Been Submitted to ADD

1. The applicant shall submit, for approval, a letter verifying the qualifications of the biological professional to MMC. This letter shall identify the PQB, Principal Restoration Specialist (PRS), and QBM, where applicable, and the names of all other persons involved in the implementation of the

revegetation/restoration plan and biological monitoring program, as they are defined in the City Biological Review References. Resumes and the biology worksheet should be updated annually.

2. MMC will provide the applicant with documentation confirming the qualifications of the PQB/PRS/QBM and all city-approved persons involved in the revegetation/restoration plan and biological monitoring of the project.

3. Prior to the start of work, the applicant must obtain approval from MMC for any personnel changes associated with the revegetation/restoration plan and biological monitoring of the project.

4. PQB must also submit evidence to MMC that the PQB/QBM has completed Storm Water Pollution Prevention Program (SWPPP) training.

Prior to Start of Construction

A. PQB/PRS Shall Attend Pre-Construction (Precon) Meetings

1. Prior to beginning any work that requires monitoring:

   a. The Owner/Permittee or their authorized representative shall arrange a Precon Meeting that shall include the PQB or PRS, Construction Manager (CM) and/or Grading Contractor (GC), Landscape Architect (LA), Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC.

   b. The PQB shall also attend any other grading/excavation-related Precon Meetings to make comments and/or suggestions concerning the revegetation/restoration plan(s) and specifications with the RIC, CM, and/or GC.

   c. If the PQB is unable to attend the Precon Meeting, the Owner shall schedule a focused Precon Meeting with MMC, PQB/PRS, CM, BI, LA, RIC, RMC, RE and/or BI, if appropriate, prior to the start of any work associated with the revegetation/ restoration phase of the project, including site grading preparation.

2. Where Revegetation/Restoration Work Will Occur

   a. Prior to the start of any work, the PQB/PRS shall also submit a revegetation/restoration monitoring exhibit (RRME) based on the appropriate reduced LCD (reduced to 11”x 17” format) to MMC, and the

RE, identifying the areas to be revegetated/restored including the delineation of the limits of any disturbance/grading and any excavation.

b. PQB shall coordinate with the construction superintendent to identify appropriate Best Management Practices (BMP's) on the RRME.

3. When Biological Monitoring Will Occur

a. Prior to the start of any work, the PQB/PRS shall also submit a monitoring procedures schedule to MMC and the RE indicating when and where biological monitoring and related activities will occur.

4. PQB Shall Contact MMC to Request Modification

a. The PQB may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the revegetation/restoration plans and specifications. This request shall be based on relevant information (such as other sensitive species not listed by federal and/or state agencies and/or not covered by the MSCP and to which any impacts may be considered significant under CEQA) which may reduce or increase the potential for biological resources to be present.

During Construction

A. PQB or QBM Present During Construction/Grading/Planting

1. The PQB or QBM shall be present full-time during construction activities including but not limited to, site preparation, clearing, grading, excavation, landscape establishment in association with sensitive plant restoration activity which could result in impacts to sensitive biological resources as identified in the LCD and on the RRME. The RIC and/or QBM are responsible for notifying the PQB/PRS of changes to any approved construction plans, procedures, and/or activities. The PQB/PRS is responsible for notifying the CM, LA, RE, BI, and MMC of the changes.

2. The PQB or QBM shall document field activity via the Consultant Site Visit Record Forms (CSVR). The CM shall provide the CSVRs on the first day of monitoring, the last day of monitoring, monthly, and in the event of a deviation from conditions identified within the LCD and/or biological monitoring program. The RE shall forward copies to MMC.

3. The PQB or QBM shall be responsible for maintaining and submitting the CSVR at the time that CM responsibilities end (i.e., upon the completion of construction activity other than that associated with biology).

4. All construction activities (including staging areas) shall be restricted to the development areas as shown on the LCD. The PQB/PRS or QBM staff shall monitor construction activities as needed, with MMC concurrence on method and schedule. This is to ensure that construction activities do not encroach into biologically sensitive areas beyond the limits of disturbance as shown on the approved LCD.

5. The PQB or QBM shall supervise the placement of orange construction fencing or City approved equivalent, along the limits of potential disturbance adjacent to (or at the edge of) all sensitive habitats (coastal sage scrub [Tier II], scrub oak chaparral [Tier I], and southern mixed chaparral [Tier IIIA]) as shown on the approved LCD.

6. The PQB shall provide a letter to MMC that limits of potential disturbance have been surveyed and staked, and that the construction fencing is installed properly.

7. The PQB or QBM shall oversee the implementation of BMPs, such as gravel bags, straw logs, silt fences, or equivalent erosion control measures, as needed to ensure the prevention of any significant sediment transport. In addition, the PQB/QBM shall be responsible for verifying the removal of all temporary construction BMPs upon completion of construction activities. Removal of temporary construction BMPs shall be verified in writing on the final construction phase CSVR.

8 PQB shall verify in writing on the CSVR's that no trash stockpiling or oil dumping, fueling of equipment, storage of hazardous wastes or construction equipment/material, parking, or other construction-related activities shall occur adjacent to sensitive habitat. These activities shall occur only within the designated staging area located outside the area defined as a biologically sensitive area.

9. The long-term establishment inspection and reporting schedule per LCD must all be approved by MMC prior to the issuance of the Notice of Completion (NOC) or any bond release.

B. Disturbance/Discovery Notification Process

1. If unauthorized disturbances occur or sensitive biological resources are discovered that were not previously identified on the LCD and/or RRME, the PQB or QBM shall direct the contractor to divert construction in the area of disturbance or discovery temporarily and immediately notify the RE or BI, as appropriate.

2. The PQB shall also immediately notify MMC by telephone of the disturbance, report the nature and extent of the disturbance, and recommend the method of additional protection, such as fencing and appropriate Best Management Practices (BMPs). After obtaining concurrence with MMC and the RE, PQB and CM shall install the approved protection and agreement on BMP's.

3. The PQB shall also submit written documentation of the disturbance to MMC within 24 hours by email with photos of the resource in context (e.g., showing adjacent vegetation).

C. Determination of Significance

1. The PQB shall evaluate the significance of disturbance and/or discovered biological resource and provide a detailed analysis and recommendation in a letter report with the appropriate photo documentation to MMC to obtain concurrence and formulate a plan of action which can include fines, fees, and supplemental mitigation costs.

2. MMC shall review this letter report and provide the RE with MMC's recommendations and procedures.

Post-Construction

A. Mitigation Monitoring and Reporting Period

1. Five-Year Mitigation Establishment/Maintenance Period

a. The RMC shall be retained to complete maintenance monitoring activities throughout the five-year mitigation monitoring period.

b. Maintenance visits will be conducted monthly for the first year, monthly from January to June of the second and third years, quarterly from July to December in the second and third years, and quarterly thereafter.

c. Maintenance activities will include all items described in the LCD.

d. Plant replacement will be conducted as recommended by the PQB (note: plants shall be increased in container size relative to the time of

initial installation or establishment or maintenance period may be extended to the satisfaction of MMC.

2. Five-Year Biological Monitoring

   a. All biological monitoring and reporting shall be conducted by a PQB or QBM, as appropriate, consistent with the LCD.

   b. Monitoring shall involve both qualitative horticultural monitoring and quantitative monitoring (i.e., performance/success criteria). Horticultural monitoring shall focus on soil conditions (e.g., moisture and fertility), container plant health, seed germination rates, presence of native and non-native (e.g., invasive exotic) species, any significant disease or pest problems, irrigation repair and scheduling, trash removal, illegal trespass, and any erosion problems.

   c. After plant installation is complete, qualitative monitoring surveys will occur monthly for the first 3 years, quarterly from July to December in the second and third years, and quarterly thereafter.

   d. Upon the completion of the 120-day short-term plant establishment period, quantitative monitoring surveys shall be conducted at 12, 24, 36, 48, and 60 months by the PQB or QBM. The revegetation/restoration effort shall be quantitatively evaluated once per year (in spring) during years one through five, to determine compliance with the performance standards identified on the LCD. All plant material must have survived without supplemental irrigation for the last two years.

   e. Quantitative monitoring shall include counts of Del Mar manzanita, Nuttall's scrub oak and barrel cactus survivorship. The data will be used to determine the attainment of performance/success criteria identified within the LCD.

   f. The biological monitoring requirements may be reduced if the revegetation meets the fifth-year criteria before the end of the fifth year and the irrigation has been terminated for the last two years.

   g. The PQB or QBM shall oversee the implementation of post-construction BMPs, such as gravel bags, straw logs, silt fences, or equivalent erosion control measures, as needed to ensure the prevention of any significant sediment transport. In addition, the PQB/QBM shall be responsible for verifying the removal of all

temporary post-construction BMPs upon completion of construction activities. Removal of temporary post-construction BMPs shall be verified in writing on the final post-construction phase CSVR.

C. Submittal of Draft Monitoring Report

1. A draft monitoring letter report shall be prepared to document the completion of the 120-day plant establishment period. The report shall include a discussion of weed control, horticultural treatments (pruning, mulching, and disease control), erosion control, trash/debris removal, replacement planting/reseeding, site protection/signage, pest management, vandalism, and irrigation maintenance. The revegetation/restoration effort shall be visually assessed at the end of the 120-day period to determine individual mortality.

2. The PQB shall submit two copies of the Draft Monitoring Report which describes the results, analysis, and conclusions of all phases of the Biological Monitoring and Reporting Program (with appropriate graphics) to MMC for review and approval within 30 days following the completion of monitoring. Monitoring reports shall be prepared on an annual basis for a period of five years. Site progress reports shall be prepared by the PQB following each site visit and provided to the Owner, RMC, and RIC. Site progress reports shall review maintenance activities (qualitatively and quantitatively when appropriate), monitoring results including progress of the revegetation relative to the performance/success criteria, and the need for any remedial measures.

3. Draft annual reports (three copies) summarizing the results of each progress report, including quantitative monitoring results and photographs taken from permanent viewpoints, shall be submitted to MMC for review and approval within 30 days following the completion of monitoring.

4. MMC shall return the Draft Monitoring Report to the PQB for revision or, for preparation of each report.

5. The PQB shall submit a revised Monitoring Report to MMC (with a copy to RE) for approval within 30 days.

6. MMC will provide written acceptance of the PQB and RE of the approved report.

D. Final Monitoring Reports(s)

1. PQB shall prepare a Final Monitoring upon achievement of the fifth-year performance/success criteria and completion of the five-year maintenance period.

a. This report may be issued before the end of the fifth year if the revegetation meets the fifth-year performance /success criteria and the irrigation has been terminated for the last two years.

b. The Final Monitoring report shall be submitted to MMC for evaluation of the success of the mitigation effort and final acceptance. At this time, a request for a pre-final inspection shall be submitted; MMC will schedule after reviewing the report.

c. If at the end of the five years, any of the revegetated areas fails to meet the project's final success standards, the applicant must consult with MMC. This consultation shall take place to determine whether the revegetation effort is acceptable. The applicant understands that failure of any significant portion of the revegetation/restoration area may result in a requirement to replace or renegotiate that portion of the site and/or extend the monitoring and establishment/maintenance period until all success standards are met.

MM-BIO-3 **Avian Protection Requirements.** Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits, and Building Plans/Permits, or a Notice to Proceed for Subdivisions, removal of habitat that supports active Cooper's hawk nests in the proposed area of disturbance (both on site and within the Wetland Plan area of work) should occur outside of the avian breeding season (February 1 to September 15) or a pre-construction survey shall be completed by a Qualified Biologist to determine the presence or absence of active nesting Cooper's hawk on the proposed area of disturbance or within 300 feet of the area of disturbance. The pre-construction survey shall be conducted within 3 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to City of San Diego DSD for review and written approval prior to initiating any construction activities. If nesting Cooper's hawk are detected, a letter report in conformance with the City of San Diego's Biology Guidelines and applicable state and federal law (i.e., appropriate follow-up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. A minimum 300-foot buffer shall be established from any nesting Cooper's hawk. The report shall be submitted to the City of San Diego for review and written approval and implemented to the satisfaction of the City of San Diego. The City of San Diego's MMC Section and Biologist shall verify and approve

that all measures identified in the report or mitigation plan are in place prior to and/or during construction.

MM-BIO-4 Coastal California Gnatcatcher

Prior to the issuance of any Notice to Proceed, or pre-construction meeting, the City Deputy Director (or appointed designee) shall verify that the Multi-Habitat Planning Area (MHPA) boundaries and the following project requirements regarding the coastal California gnatcatcher are shown on the construction plans:

No clearing, grubbing, grading, or other construction activities shall occur within the MHPA between March 1 and August 15, the breeding season of the coastal California gnatcatcher, until the following requirements have been met to the satisfaction of the Deputy Director (or appointed designee):

A. A Qualified Biologist (possessing a valid Endangered Species Act Section 10(a)(1)(a) recovery permit) shall survey those habitat areas within the MHPA that would be subject to construction noise levels exceeding 60 dB(A) hourly average for the presence of the coastal California gnatcatcher. Surveys for the coastal California gnatcatcher shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of any construction. If gnatcatchers are present, then the following conditions must be met:

   i. Between March 1 and August 15, no clearing, grubbing, or grading of occupied gnatcatcher habitat shall be permitted within the MHPA. Areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; and

   ii. Between March 1 and August 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dB(A) hourly average at the edge of occupied gnatcatcher habitat within the MHPA. An analysis showing that noise generated by construction activities would not exceed 60 dB(A) hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing a current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the City representative at least 2 weeks prior to the commencement of construction activities. Prior to the commencement of construction activities during the

breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; or

iii. At least 2 weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dB(A) hourly average at the edge of habitat occupied by the coastal California gnatcatcher. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring* shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dB(A) hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (August 16).

*Note: Construction noise shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the City representative, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

B. If coastal California gnatcatchers are not detected during the protocol survey, the Qualified Biologist shall submit substantial evidence to the Deputy Director (or appointed designee) and applicable resource agencies that demonstrates whether or not mitigation measures, such as noise walls, are necessary between March 1 and August 15, as follows:

i. If this evidence indicates the potential is high for coastal California gnatcatcher to be present based on historical records or site conditions, then condition A.iii shall be adhered to, as specified above.

ii. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

MM-BIO-5 **Pre-Construction Survey for Crotch's Bumble Bee.** Should this species no longer be a state candidate for listing or state listed threatened or endangered at the time of the pre-construction meeting or protocol surveys are completed and determine the species is absent from the project site, then no avoidance measures shall be required.

Prior to the issuance of a Notice to Proceed (NTP) for construction permits, such as Demolition Grading or Building or beginning and construction-related activity on site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve Construction Documents (CD) (plans, specification, details, etc.) to ensure the applicable MMRP requirements are incorporated into the design:

A) The Owner/Permittee shall obtain an Incidental Take Permit (ITP) from the California Department of Fish and Wildlife (CDFW) prior to the issuance of Grading Permit, Demolition Plans/Permits and Building Plans/Permits. Take of any endangered, threatened, candidate species that results from the project is prohibited, except as authorized by State law (California Fish and Game Code §§ 86, 2062, 2067, 2068, 2080, 2085; California Code of Regulations, Title 14, §786.9) under the CESA.

B) To avoid impacts on Crotch's bumble bee, removal of habitat in the proposed area of disturbance must occur outside of the Colony Active Period between April 1 through August 31. If the removal of habitat in the proposed area of disturbance must occur during the Colony Active Period, a Qualified Biologist shall conduct a pre-activity survey to determine the presence or absence of Crotch's bumble bee within the proposed area of disturbance.

C) Surveys must be conducted by a Qualified Biologist meeting the qualifications discussed in the CDFW guidance (i.e., Survey Considerations for California Endangered Species Act [CESA] Candidate Bumble Bee Species, dated June 6, 2023).

D) The pre-activity survey shall consist of photographic surveys following CDFW guidance (i.e., Survey Considerations for CESA Candidate Bumble Bee Species, dated June 6, 2023). In coordination with CDFW, the Qualified Biologist may be required to send all photo vouchers to a CDFW-approved taxonomist to confirm the identifications of the bumble bees encountered during surveys. The surveys shall consist of passive methods unless a Memorandum of

Understanding is obtained from CDFW. If additional activities (e.g., capture or handling) are deemed necessary to identify bumble bees of an unknown species that may be Crotch's bumble bee then the Qualified Biologist shall obtain the required authorization via a Memorandum of Understanding or Scientific Collecting Permit pursuant to CDFW Survey Considerations for CESA Candidate Bumble Bee Species (CDFW 2023). Survey methods that involve lethal take of species are not acceptable. Survey results will be considered valid until the start of the next colony active period.

E) If pre-activity surveys identify Crotch's bumble bee individuals on site, the Qualified Biologist shall notify and consult with CDFW to establish, monitor, and maintain no-work buffers around the associated floral resources or nest, as appropriate. The size and configuration of the no-work buffer shall be based on the best professional judgment of the Qualified Biologist in consultation with CDFW. Construction activities shall not occur within the no-work buffers until the bees appear no longer active (i.e., associated floral resources appear desiccated and no bees are seen flying for three consecutive days indicating dispersal from the area).

F) Survey data shall be submitted by the Qualified Biologist to the California Natural Diversity Database (CNDDB) in accordance with the Memorandum of Understanding with CDFW, or Scientific Collecting Permit requirements, as applicable.

Significance After Mitigation

Impacts to sensitive upland vegetation communities would be reduced to less than significant with the implementation of MM-BIO-1, which includes upland habitat mitigation. Further, with MM-BIO-1 and MM-BIO-2, which would translocate the Del Mar manzanita, Nuttall's scrub oak, and barrel cactus individuals within the project impact area to within the upland habitat area created on site, impacts would be less than significant.

The identified non-listed special-status wildlife have a relatively wide distribution and would be less than significant following implementation of habitat-based upland compensatory mitigation that would be provided on site (preservation and restoration) (MM-BIO-1). The habitat-based upland compensatory mitigation would also ensure that impacts to associated habitat for non-listed special-status wildlife species would be less than significant.

Potential impacts to nesting birds, including raptors, through direct take of active nest or indirect noise/disturbance to raptor nests within 300 feet would be less than significant with implementation of MM-BIO-3 that requires avoidance of active nest through seasonal restriction or surveys to

confirm a lack of active nests within project work areas or within a 300-foot buffer for raptors, including Cooper's hawk.

Potential impacts to coastal California gnatcatcher would be less than significant through implementation of MM-BIO-4 that requires avoidance of the breeding season or surveys and noise monitoring to ensure occupied habitat areas are not subject to direct or indirect impacts that could result in breeding impacts.

To reduce impacts to Crotch's bumble bee to less than significant, a pre-construction survey for the species would be conducted, which would help minimize take of individuals (MM-BIO-5). With regards to the loss of potential nesting and foraging habitat for Crotch's bumble bee, the proposed habitat mitigation would provide the minimum 1:1 mitigation recommended by CDFW. As stated in MM-BIO-1, 18.22 acres of Tier I-III habitat mitigation would be provided for the loss of 17.60 acres of Tier I-III habitat (MM-BIO-1). Furthermore, the proposed total on-site preserve (including Tier IV habitat) would be 18.78 acres, which also provides a greater than 1:1 mitigation ratio compared with the total development area (including Tier IV habitat) that would be 18.01 acres (project construction footprint and zone 1 brush management). Therefore, the loss of nesting and foraging habitat for Crotch's bumble bee is reduced to less than significant through implementation of MM-BIO-1.

5.4.3.2 Issue 3: Jurisdictional Wetlands

Issue 3: Would the project result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruptions, or other means?

Thresholds

In accordance with the City's Significance Determination Thresholds (City of San Diego 2022), the project would have a significant impact if it would:

- Result in substantial adverse impacts on wetlands through direct removal, filling, hydrological interruption, or other means.

Impact Analysis

Direct Impacts

The project would directly impact aquatic resources estimated to include the jurisdiction of RWQCB and CDFW, including emergent wetland and natural flood channel in the study area (Table 5.4-5). In addition, an area of herbaceous wetland (artificial) that is expected to within RWQCB jurisdiction

only would be impacted by the project and proposed on-site wetland restoration (Figure 5.4-2, Potential Jurisdictional Resources).

Table 5.4-5
Potential Jurisdictional Aquatic Resource Impacts in the Project Study Area

Vegetation Community/Land Cover Type	Jurisdiction	Total Area (Acreage)	Impact Area (Acreage)
Emergent wetland	RWQCB/CDFW	0.41	0.31
Natural flood channel	RWQCB/CDFW	0.20	0.18
Herbaceous wetland (artificial)	RWQCB	0.42	0.41
Total	**—**	**1.03**	**0.90**

Note: CDFW = California Department of Fish and Wildlife; RWQCB = San Diego Regional Water Quality Control Board.

As described in Section 5.4.1, none of the potential jurisdictional resources are considered wetlands under the City's definition or waters of the United States. The project applicant would obtain all required RWQCB and CDFW permits for impacts to jurisdictional resources prior to project initiation.

Indirect Impacts

The area outside the proposed project grading extents contains several potentially jurisdictional resources areas, including emergent wetland and several non-wetland waters potentially regulated by RWQCB and CDFW. Waters of the United States, waters of the state, and City wetlands are typically affected in the short term by dust, invasive plant species, and increased human presence, and in the long term by changes in the velocity of runoff during and following construction, which could adversely affect the integrity of downstream resources, causing erosion and sedimentation. These indirect impacts to off-site jurisdictional resources would be reduced by measures included in the project design (including the proposed wetland buffer); project compliance with National Pollution Discharge Elimination System regulations; incorporation of appropriate BMPs during construction (e.g., fiber rolls); installation of permanent BMPs in accordance with the City's Storm Water Standards Manual (City of San Diego 2018b); preparation and implementation of a project-specific stormwater pollution prevention plan; and the project would include implementation of standard construction protection measures, which include having a qualified biologist present to supervise flagging of sensitive resources prior to construction, provide environmental training, and ensure no unauthorized impacts occur during construction. There are no City-defined wetlands resources adjacent to the proposed development and therefore no city-defined wetland buffers.

The project has been designed to minimize project indirect impacts to wetland buffers through (1) re-planting native species on the proposed manufactured slopes in order to increase the function of the adjacent wetland buffer, and (2) installing a fence along the boundary between the project

construction footprint and the MHPA to discourage human intrusion into sensitive vegetation communities. This would avoid indirect impacts to jurisdictional resources.

Significance of Impact

Direct Impacts

Impacts associated with project construction and restoration activities within the areas potentially under the jurisdiction of RWQCB and/or CDFW are anticipated to be potentially significant.

Indirect Impacts

The project would not result in substantial adverse indirect impacts to jurisdictional wetlands. Impacts would be less than significant.

Mitigation Measures

MM-BIO-6 **Jurisdictional Aquatic Resources.** Prior to issuance of land development permits, including clearing, grubbing, grading, and/or construction permits by the City of San Diego that impact jurisdictional waters, the project applicant shall obtain all necessary permits from RWQCB and CDFW (or written verification from these agencies that permits are not required). The applicant shall mitigate direct impacts in accordance with the terms and conditions of all required permits. Areas under the jurisdictional authority of RWQCB and CDFW shall be delineated on all grading plans.

Significance After Mitigation

Impacts to jurisdictional areas are expected to require permit authorization from CDFW and RWQCB, with compensatory mitigation requirements for impacts to natural flood channel and emergent wetland. With implementation of MM-BIO-6, permit authorizations from CDFW and RWQCB would be obtained, compensatory habitat mitigation would be provided to offset the impacts, and the project would be in compliance with CDFW and RWQCB mitigation requirements. Impacts after mitigation would be less than significant.

5.4.3.3 Issue 4: Movement of Fish or Wildlife Species and Native Wildlife Nursery Sites

Issue 4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife

corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?

Thresholds

In accordance with the City's Significance Determination Thresholds, the project would have a significant impact if it would:

- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites.

Impact Analysis

As discussed in Section 5.4.1, Existing Conditions, the project area, including the project impact footprint, contains relatively large patches of southern mixed chaparral and coastal sage scrub that have potential to provide refuge, cover, and foraging opportunities for mobile wildlife species that may be moving through the area. Given the residential development surrounding the entire project area, it is likely that wildlife that flies (e.g., birds and bees) would be the primary wildlife group that could use the site as a stepping-stone-type habitat linkage between the expansive Scripps Ranch/Miramar open space to the southeast and the Peñasquitos Creek watershed to the northwest. Sensitive wildlife present or assumed present on the site that could utilize the site as a stepping-stone include the coastal California gnatcatcher, Cooper's hawk, and Crotch's bumble bee. Coastal California gnatcatcher is assumed to be present within suitable habitat both within and adjacent to the project. Direct impacts to associated habitat for all species with moderate to high potential to occur could result during construction, including habitat for the Cooper's hawk and coastal California gnatcatcher. Further, direct impacts to foraging and nesting habitat for the Crotch's bumble bee could occur during construction activities.

Significance of Impact

The project has the potential to directly impact habitat for the Cooper's hawk, coastal California gnatcatcher, and Crotch's bumble bee. Thus, disruption of wildlife movement, wildlife corridors, or nursery sites are expected with implementation of the project. Impacts would be potentially significant.

Mitigation Measures

The project would implement MM-BIO-1, MM-BIO-3, and MM-BIO-4 (see Section 5.4.3.1) to reduce impacts to less than significant.

Significance After Mitigation

Potential impacts to nesting bird habitat through direct take of active nests would be less than significant with implementation of MM-BIO-3, which requires avoidance of active nest through seasonal restriction or surveys to confirm a lack of active nests within project work areas or within a 300-foot buffer for raptors, including Cooper's hawk.

Potential impacts to coastal California gnatcatcher habitat would be less than significant through implementation of MM-BIO-4, which requires avoidance of the breeding season or surveys and noise monitoring to ensure occupied habitat areas are not subject to direct or indirect impacts that could result in breeding impacts.

With regards to the loss of potential nesting and foraging habitat for Crotch's bumble bee, the proposed habitat mitigation would provide the minimum 1:1 mitigation recommended by CDFW. As stated in MM-BIO-1, 18.22 acres of Tier I-III habitat mitigation would be provided for the loss of 17.60 acres of Tier I-III habitat (MM-BIO-1). Furthermore, the proposed total on-site preserve (including Tier IV habitat) would be 18.78 acres, which also provides a greater than 1:1 mitigation ratio compared with the total development area (including Tier IV habitat) that would be 18.01 acres (project construction footprint and zone 1 brush management). Therefore, the loss of nesting and foraging habitat for Crotch's bumble bee is reduced to less than significant through implementation of MM-BIO-1.

5.4.3.4 Issues 5 and 6: MSCP Conflict

Issue 5: Would the project result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region?

Issue 6: Would the project introduce a land use within an area adjacent to the MHPA that would result in adverse edge effects?

Thresholds

In accordance with the City's Significance Determination Thresholds (City of San Diego 2022), the project would have a significant impact if it would:

- Result in a conflict with the provisions of an adopted habitat conservation plan, natural conservation community plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region, or;

- Introduce land use within an area adjacent to the MHPA that would result in adverse edge effects.

Impact Analysis

The project includes an MSCP boundary line adjustment (BLA). All proposed MHPA boundary changes require approval from USFWS and CDFW. The proposed BLA would result in a net increase in MHPA area and value to the MHPA through the restoration of existing MHPA areas on the project parcel and off-site addition to the MHPA. The off-site MHPA addition area is located within the City of San Diego, east of Regents Road and west of Pocahontas Avenue, and is a total of 18.7 acres. As a result, the MHPA BLA proposed here has been determined to meet and exceed the requirements of the City's MSCP for adjustments to the boundary of the MHPA under a "like or equivalent" exchange. Concurrence on this determination has been provided by USFWS and CDFW. Because a portion of the project impact footprint would occur within and adjacent to the MHPA following approval of the BLA, the project is required to document compliance with the City's MSCP LUAG. Project consistency with the City's MSCP LUAG is discussed further in Section 4.1 of Appendix D. Implementation of the LUAG as stated verbatim in the MSCP would be included as a conditions of approval for the project. The LUAG measures to be implemented in the project include implementation of bioswale filtration basin, compliance with a project specific stormwater pollution prevention plan, lighting that would be directed away from the MHPA, barriers and fencing along the MHPA, avoidance of invasive species in landscape plan, brush management zones, and including grading within the project footprint.

As such, the project would not result in impacts to areas delineated as MHPA. However, as described above, under issues 1 and 2, impacts to MSCP-covered species could occur. The project would impact two MSCP-covered plant species, including Del Mar manzanita and San Diego barrel cactus, and two MSCP-covered wildlife species, California gnatcatcher and Cooper's hawk. Specifically, there were a total of 23 Del Mar manzanita individuals observed in scrub oak chaparral and mixed chaparral in the northern portion of the study area and 94 San Diego barrel cactus individuals observed in mixed chaparral in the southeast portion of the study area. Construction activities would potentially impact these covered species through the loss of habitat and by removal of individual plants. The project has been designed to conform with Area Specific Management Directives for these two species. Edge effects and disturbance to these species would be reduced and minimized through compliance with the MSCP LUAG, as described above. A fire fuel load modeling report has been prepared for the project and contains fire protection measures, including a brush management plan, to reduce the potential for habitat degradation due to unplanned fire.

The project would potentially impact two MSCP-covered wildlife species: coastal California gnatcatcher and Cooper's hawk, considering that portions of the site are considered occupied by

these species. However, the project has been designed to conform with Area Specific Management Directives for these two species. Edge effects and disturbance to this species would be reduced and minimized through compliance with the MSCP LUAG, as described above. A fire fuel load modeling report has been prepared for the project and contains fire protection measures, including a brush management plan, to reduce the potential for habitat degradation due to unplanned fire. Through extension of the Zone 1 Brush Management area (additional 25 linear feet added) and fire-safe improvements to structures facing open space MHPA areas, the project would not require a Zone 2 Brush Management area, which would reduce edge effects to coastal California gnatcatcher by avoiding maintenance activities typically conducted in Zone 2. In addition, since all manufactured slopes and Tier IV habitats on site would be restored to native habitats, further edge effects from off-site development would be reduced. Construction activities may still result in direct or indirect impacts to breeding coastal California gnatcatcher within the MHPA and/or Cooper's hawk within 300 feet of the project construction areas.

Significance of Impact

The project would impact MSCP-covered plant species (Del Mar manzanita and San Diego barrel cactus) and MSCP-covered wildlife species (Cooper's hawk and coastal California gnatcatcher), and would conflict with the provisions of the MSCP; impacts would be potentially significant.

Mitigation Measures

The project would implement MM-BIO-1, MM-BIO-2, MM-BIO-3, and MM-BIO-4 (see Section 5.4.3.1) to reduce impacts to less than significant.

Significance After Mitigation

With the inclusion of MM-BIO-1, which includes upland habitat mitigation through habitat-based replacement, and MM-BIO-2, which would translocate the Del Mar manzanita, Nuttall's scrub oak, and barrel cactus individuals within the project impact area to within the upland habitat area created on site the project would be in compliance with the MSCP and impacts would be less than significant. Implementation of MM-BIO-3 and MM-BIO-4 would ensure that construction does not directly or indirectly adversely affect breeding Cooper's hawk within 300 feet of project construction areas or breeding coastal California gnatcatcher within the MHPA by requiring avoidance of the breeding season or surveys and appropriate buffers and/or noise monitoring.

5.4.3.5 Issue 7: Local Policies or Ordinances Protecting Biological Resources

Issue 7: Would the project result a conflict with any local policies or ordinances protecting biological resources?

Thresholds

In accordance with the City's Significance Determination Thresholds (City of San Diego 2022), the project would have a significant impact if it would:

- Result in a conflict with any local policies or ordinances protecting biological resources.

Impact Analysis

The project would comply with the City's ESL Regulations and Biology Guidelines. As discussed under Land Use, the project would be consistent with applicable plans and policies. Refer to Land Use, Section 5.1, for further detail.

Significance of Impact

Impacts resulting from a conflict with any local policies or ordinances protecting biological resources would not occur as the project would be consistent with the City's ESL Regulations and Biology Guidelines. No impact would occur.

Mitigation Measures

As there would be no impact, no mitigation would be required.

5.4.3.6 Issue 8: Introduction of Invasive Species

Issue 8: Would the project result in the introduction of invasive species of plants into a natural open space area?

Thresholds

In accordance with the City's Significance Determination Thresholds (City of San Diego 2022), the project would have a significant impact if it would:

- Introduce invasive species of plants into natural open space area.

Impact Analysis

The project is subject to the MHPA LUAG, which requires that no invasive non-native plant species shall be introduced into areas adjacent to the MHPA. The project landscape plan does not include invasive plant species, as identified by the California Invasive Plant Council (GMP 2023). Within the on-site open space that would be retained as MHPA, any invasive species shall be entirely removed where feasible, and the removal shall be monitored by a Qualified Monitoring Biologist, as defined in the City's Biology Guidelines (City of San Diego 2018a), to ensure that dispersal of propagules (e.g., seeds, stems) is avoided or minimized. If aboveground plant material cannot be removed (e.g., due to limited access), herbicides shall be applied by a licensed applicator, using chemicals permitted as safe within aquatic environments.

Significance of Impact

The project does not result in impacts related to the introduction of invasive plant species to natural open space area. Impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

- Parcel Boundary
- MHPA Boundary
- 500-foot Project Impact Footprint Buffer
- Project Construction Footprint
- Rip Rap Dissipation Area
- Re-Established Natural Flood Channel
- Vegetated Stormwater Basin
- Manufactured Slopes
- Zone 1 Extension
- Infrastructure Pipelines
- Retaining Wall

Brush Management

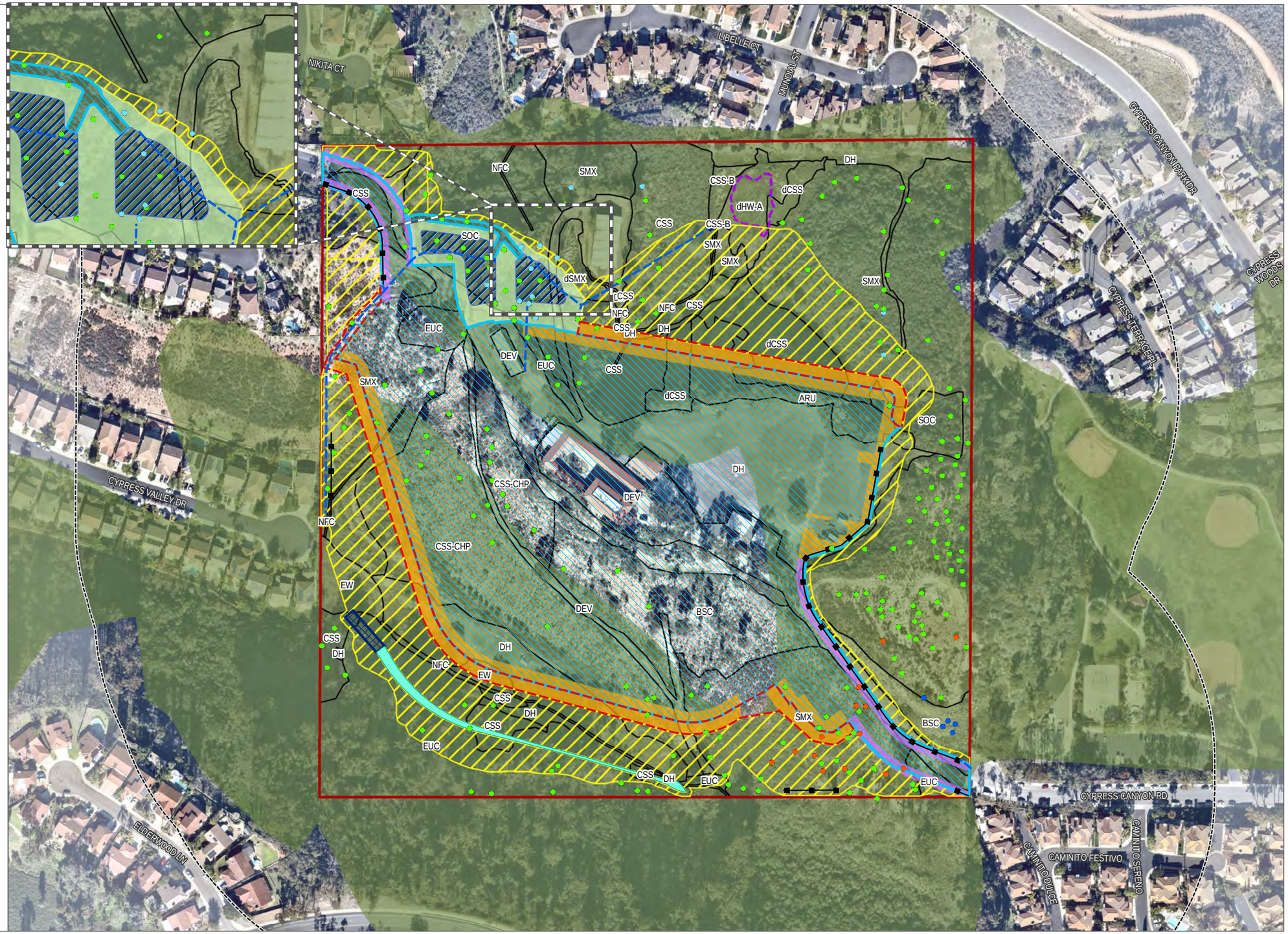
- Zone 1
- Roadside Zone
- Vegetated Stormwater Basin Management Area (Vegetation Thinning Only)

Rare Plants

- Coulter's goldfields *(Lasthenia glabrata ssp. coulteri)*
- Del Mar manzanita *(Arctostaphylos glandulosa ssp. crassifolia)*
- San Diego County viguiera *(Bahiopsis laciniata)*
- San Diego barrel cactus *(Ferocactus viridescens)*
- Scrub oak *(Quercus dumosa)*

Vegetation Communities and Land Covers

- ARU : Arundo-Dominated Disturbed Habitat (Tier IV)
- BSC : Flat-topped Buckwheat (Tier II)
- CSS : Diegan Coastal Sage Scrub (Tier II)
- CSS-B : Diegan Coastal Sage Scrub (Baccharis-dominated) (Tier II)
- CSS-CHP : Coastal Sage-Chaparral Transition (Tier II)
- DEV : Developed (Tier IV)
- DH : Disturbed Habitat (Tier IV)
- EUC : Eucalyptus Woodland (Tier IV)
- EW : Emergent Wetland (Tier IV)
- NFC : Natural Flood Channel (Tier IV)
- SMX : Southern Mixed Chaparral (Tier IIIA)
- SOC : Scrub Oak Chaparral (Tier I)
- dCSS : Diegan Coastal Sage Scrub (Tier II)
- dHW-A : Herbaceous Wetland (Artificial) (Tier IV)
- dSMX : Southern Mixed Chaparral (Tier IIIA)



SOURCE: SANGIS 2020

0 100 200 Feet

FIGURE 5.4-1

Vegetation Communities and Rare Plants

EIR for the Renzulli Estates Project, City of San Diego, California

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- Parcel Boundary
- 500-foot Project Impact Footprint Buffer
- Project Construction Footprint
- Rip Rap Dissipation Area
- Re-Established Natural Flood Channel
- Vegetated Stormwater Basin
- Manufactured Slopes
- Zone 1 Extension
- Infrastructure Pipelines
- Retaining Wall
- Data Point
- Transect (ODP)
- Wetland (Expected RWQCB)
- Non-Wetland Waters (Unvegetated Streambed - Expected RWQCB / CDFW)

Brush Management

- Vegetated Stormwater Basin Management Area (Vegetation Thinning Only)

Vegetation Communities and Land Covers

- ARU : Arundo-Dominated Disturbed Habitat (Tier IV)
- BSC : Flat-topped Buckwheat (Tier II)
- CSS : Diegan Coastal Sage Scrub (Tier II)
- CSS-B : Diegan Coastal Sage Scrub (Baccharis-dominated) (Tier II)
- CSS-CHP : Coastal Sage-Chaparral Transition (Tier II)
- DEV : Developed (Tier IV)
- DH : Disturbed Habitat (Tier IV)
- EUC : Eucalyptus Woodland (Tier IV)
- EW : Emergent Wetland (Tier IV)
- NFC : Natural Flood Channel (Tier IV)
- SMX : Southern Mixed Chaparral (Tier IIIA)
- SOC : Scrub Oak Chaparral (Tier I)
- dCSS : Diegan Coastal Sage Scrub (Tier II)
- dHW-A : Herbaceous Wetland (Artificial) (Tier IV)
- dSMX : Southern Mixed Chaparral (Tier IIIA)

SOURCE: SANGIS 2020

DUDEK

0 100 200 Feet

FIGURE 5.4-2

Potential Jurisdictional Resources

Biological Technical Report for the Renzulli Estates Project, City of San Diego, California

INTENTIONALLY LEFT BLANK

- Parcel Boundary
- MHPA after BLA
- Project Construction Footprint
- Rip Rap Dissipation Area
- Re-Established Natural Flood Channel
- Vegetated Stormwater Basin
- Restoration (Manufactured Slopes)
- Restoration (Manufactured Slopes - No Credit)
- Preservation
- Preservation (No Credit)
- Creation (Tier II Habitat)
- Enhancement (Tier IIIA Habitat)
- Restoration (Tier IV Habitats)
- Wetland Creation
- Wetland Enhancement
- Wetland Rehabilitation
- Transitional Wetland
- Zone 1 Extension
- Infrastructure Pipelines
- Retaining Wall
- Drainage Facilities Easement
- Brush/Landscape Management Easement

Brush Management

- Vegetated Stormwater Basin Management Area (Vegetation Thinning Only)

Vegetation Communities and Land Covers

- ARU : Arundo-Dominated Disturbed Habitat (Tier IV)
- BSC : Flat-topped Buckwheat (Tier II)
- CSS : Diegan Coastal Sage Scrub (Tier II)
- CSS-B : Diegan Coastal Sage Scrub (Baccharis-dominated) (Tier II)
- CSS-CHP : Coastal Sage-Chaparral Transition (Tier II)
- DEV : Developed (Tier IV)
- DH : Disturbed Habitat (Tier IV)
- EUC : Eucalyptus Woodland (Tier IV)
- EW : Emergent Wetland (Tier IV)
- NFC : Natural Flood Channel (Tier IV)
- SMX : Southern Mixed Chaparral (Tier IIIA)
- SOC : Scrub Oak Chaparral (Tier I)
- dCSS : Diegan Coastal Sage Scrub (Tier II)
- dHW-A : Herbaceous Wetland (Artificial) (Tier IV)
- dSMX : Southern Mixed Chaparral (Tier IIIA)



SOURCE: SANGIS 2020

0 100 200 Feet

FIGURE 5.4-3

On-site Preservation Area

Biological Technical Report for the Renzulli Estates Project, City of San Diego, California

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5.5 ENERGY

This section describes the existing energy production/consumption conditions of the proposed Renzulli Estates Project (project) site, identifies the associated regulatory framework, and evaluates potential impacts related to the implementation of the project. The following discussion is consistent with and fulfills the intent of California Environmental Quality Act (CEQA) Guidelines Appendix G and is based on information from the project-specific air quality report (Appendix C), the greenhouse gas (GHG) technical report (Appendix F), and technical data (e.g., the California Energy Demand 2018–2030 Revised Forecast [CEC 2018] and the 2019 Integrated Energy Policy Report Update [CEC 2020a]).

5.5.1 EXISTING CONDITIONS

Existing Physical Conditions

Currently, the majority of the project site is surrounded by existing residential development, including mostly single-family homes to the north, west, and northeast; multifamily residential to the southeast; and undeveloped open space to the south. To the east is Cypress Canyon Park and residential development. Within the project site, the majority of the land is undeveloped, with some development present in the center of the site. Additionally, the center of the site includes a cleared, paved area, with various unpaved roads extending throughout the site. Refer to Chapter 2, Environmental Setting, for additional details regarding the site conditions and surrounding community features.

The project site is currently vacant; therefore, energy usage is minimal.

Environmental Setting

The environmental setting for the proposed project related to electricity, natural gas, and petroleum—including associated service providers, supply sources, and estimated consumption—is discussed below. In 2022 (the latest calendar year for which data are uniformly available for all three types of energy sources), California's estimated annual energy use included the following:

- Approximately 287,826 gigawatt hours of electricity (CEC 2022a)
- Approximately 12 billion therms of natural gas (CEC 2022b)
- Approximately 13.6 billion gallons of gasoline (CEC 2023a)

Electricity

Electricity usage in California for different land uses varies substantially by the types of uses in a building, type of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building. Due to the state's energy efficiency building standards and efficiency and conservation programs, California's electricity use per capita has remained stable for more than 30 years, while the national average has steadily increased (CEC 2016).

San Diego Gas & Electric Company (SDG&E) provides electric services to 3.7 million customers through 1.4 million electric meters located in a 4,100-square-mile service area that includes San Diego County and southern Orange County (SDG&E 2023). SDG&E is a subsidiary of Sempra Energy and would provide electricity to the proposed project. According to the California Public Utilities Commission (CPUC), SDG&E customers consumed approximately 19,045 million kilowatt-hours (kWh) of electricity in 2020 (CPUC 2023).

SDG&E receives electric power from a variety of sources. In 2017, 44% of SDG&E's power came from eligible renewable energy sources, including biomass/waste, geothermal, small hydroelectric, solar, and wind sources. This is an improvement of 9% over the 2015 mix (CPUC 2016, 2023).

Based on energy supply and demand projections in California, statewide annual peak electricity demand is projected to grow an average of 890 megawatts per year for the next decade, or 1.4% annually, and consumption per capita is expected to remain relatively constant at 7,200 kWh to 7,800 kWh per person (CEC 2016).

In San Diego County, the California Energy Commission (CEC) reported an annual electrical consumption of approximately 7,441 million kWh in 2022 for residential use (CEC 2022a).

Natural Gas

CPUC regulates natural gas utility service for approximately 11 million customers who receive natural gas from Pacific Gas & Electric, Southern California Gas (SoCalGas), SDG&E, Southwest Gas, and several smaller natural gas utilities. CPUC also regulates independent storage operators Lodi Gas Storage, Wild Goose Storage, Central Valley Storage, and Gill Ranch Storage (CPUC 2023). SDG&E provides natural gas service to San Diego and Orange Counties. SDG&E is a wholesale customer of SoCalGas and currently receives all of its natural gas from the SoCalGas system (CPUC 2023).

CPUC regulates California natural gas rates and natural gas services, including in-state transportation over transmission and distribution pipeline systems, storage, procurement, metering, and billing. Most of the natural gas used in California comes from out-of-state natural gas basins. California gas utilities have just begun receiving biogas into their pipeline systems (CPUC 2023).

In 2017, California customers received 38% of their natural gas supply from basins located in the southwest, 27% from Canada, 27% from the Rocky Mountains, and 8% from basins located within California (CPUC 2023). Natural gas from out-of-state production basins is delivered to California through the interstate natural gas pipeline system. The major interstate pipelines that deliver out-of-state natural gas to California are the Gas Transmission Northwest Pipeline, Kern River Pipeline, Transwestern Pipeline, El Paso Pipeline, Ruby Pipeline, Southern Trails, and Mojave Pipeline. The North Baja–Baja Norte Pipeline takes gas off the El Paso Pipeline at the California/Arizona border and delivers it through California into Mexico. The Federal Energy Regulatory Commission regulates the transportation of natural gas on interstate pipelines, and CPUC often participates in Federal Energy Regulatory Commission proceedings to represent the interests of California natural gas consumers (CPUC 2023).

Most of the natural gas transported through interstate pipelines, as well as some California-produced natural gas, is delivered through the Pacific Gas & Electric and SoCalGas intrastate natural gas transmission pipeline systems (commonly referred to as California's "backbone" pipeline system). Natural gas on the backbone pipeline system is then delivered into local transmission and distribution pipeline systems or to natural gas storage fields. Some large noncore customers take natural gas directly off the high-pressure backbone pipeline system, and some core customers and other noncore customers take natural gas off the utilities' distribution pipeline systems (CPUC 2023).

Pacific Gas & Electric and SoCalGas own and operate several natural gas storage fields that are located in Northern and Southern California. These storage fields and four independently owned storage utilities—Lodi Gas Storage, Wild Goose Storage, Central Valley Storage, and Gill Ranch Storage—help meet peak-season natural gas demand and allow California natural gas customers to secure natural gas supplies more efficiently (CPUC 2023).

California's regulated utilities do not own any natural gas production facilities. All natural gas sold by these utilities must be purchased from suppliers or marketers. The price of natural gas sold by suppliers and marketers was deregulated by the Federal Energy Regulatory Commission in the mid-1980s and is determined by market forces. However, CPUC decides whether California's utilities have taken reasonable steps to minimize the cost of natural gas purchased on behalf of its core customers (CPUC 2023).

As indicated in the preceding discussion, natural gas is available from a variety of in-state and out-of-state sources and is provided throughout the state in response to market supply and demand. Complementing available natural gas resources, biogas (a mixture of gases produced by the breakdown of organic matter) may soon be available through existing delivery systems, thereby increasing the availability and reliability of resources.

Petroleum

According to the U.S. Energy Information Administration, California used approximately 524 million barrels of petroleum in 2020, with the majority (433 million barrels) used for the transportation sector, which was a substantial reduction from 2019 (659 million barrels of petroleum) due to the COVID-19 pandemic (EIA 2023). According to U.S. Energy Information Administration's Energy Outlook 2021, it may take years for the U.S. to return to 2019 levels of energy consumption following the impact of COVID-19 on the U.S. economy and global energy sector (EIA 2021). There are 42 U.S. gallons in a barrel, so in 2020, approximately 60.3 million gallons of petroleum were consumed in California each day. Petroleum usage in California includes petroleum products such as motor gasoline, distillate fuel, liquefied petroleum gases, and jet fuel. At the federal and state levels, various policies, rules, and regulations have been enacted to improve vehicle fuel efficiency, promote the development and use of alternative fuels, reduce transportation-source air pollutants and GHG emissions, and reduce vehicle miles traveled. Section 5.5.2, Regulatory Framework, discusses in more detail both federal and state regulations that would help increase fuel efficiency of motor vehicles and reduce GHG emissions. Market forces have driven the price of petroleum products steadily upward over time, and technological advances have made other energy resources or alternative transportation modes increasingly feasible. Gasoline and other vehicle fuels are commercially provided commodities and would be available to the proposed project through commercial outlets.

Largely as a result of and in response to these multiple factors, gasoline consumption within the state has declined in recent years, and the availability of other alternative fuels and energy sources has increased. The quantity, availability, and reliability of transportation energy resources have increased in recent years, and this trend may likely continue and accelerate (CEC 2020b). Increasingly available and diversified transportation energy resources promote reliable and affordable means to support vehicular transportation within the state.

Existing Infrastructure

Natural gas, if necessary for construction, and electrical power would be provided by SDG&E. No major improvements to the local distribution networks are anticipated to be needed to support the increase in units that would be introduced by the project. Any proposed new infrastructure needed to serve the project would be connected to existing dry utilities (gas and electricity) systems.

5.5.2 REGULATORY FRAMEWORK

Federal, state, and local agencies regulate energy use and consumption through various means and programs. On the federal level, the U.S. Department of Transportation, the U.S. Department of Energy, and the U.S. Environmental Protection Agency (EPA) are three federal agencies with

substantial influence over energy policies and programs. On the state level, CPUC and CEC are two agencies with authority over different aspects of energy. Relevant federal, state, and local energy-related regulations are summarized below.

Federal

Federal Energy Policy and Conservation Act

In 1975, Congress enacted the Federal Energy Policy and Conservation Act, which established the first fuel economy standards for on-road motor vehicles in the United States. Pursuant to the act, the National Highway Traffic Safety Administration is responsible for establishing additional vehicle standards. In 2012, new fuel economy standards for passenger cars and light trucks were approved for model years 2017 through 2021 (77 FR 62624–63200). Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

Energy Independence and Security Act of 2007

On December 19, 2007, the Energy Independence and Security Act of 2007 (EISA) was signed into law. In addition to setting increased Corporate Average Fuel Economy standards for motor vehicles, the EISA includes the following other provisions related to energy efficiency:

- Renewable Fuel Standard (RFS) (Section 202)
- Appliance and Lighting Efficiency Standards (Sections 301–325)
- Building Energy Efficiency (Sections 411–441)

This federal legislation requires ever-increasing levels of renewable fuels (the RFS) to replace petroleum (EPA 2013). EPA is responsible for developing and implementing regulations to ensure that transportation fuel sold in the United States contains a minimum volume of renewable fuel. The RFS program regulations were developed in collaboration with refiners, renewable fuel producers, and many other stakeholders.

The RFS program was created under the Energy Policy Act of 2005 and established the first renewable fuel volume mandate in the United States. As required under the act, the original RFS program (RFS1) required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. Under the EISA, the RFS program was expanded in several key ways that lay the foundation for achieving significant reductions in GHG emissions from the use of renewable fuels, reducing imported petroleum, and encouraging the development and expansion of the renewable fuels sector in the United States. The updated program is referred to as "RFS2" and includes the following:

- EISA expanded the RFS program to include diesel, in addition to gasoline.
- EISA increased the volume of renewable fuel required to be blended into transportation fuel from 9 billion gallons in 2008 to 36 billion gallons by 2022.
- EISA established new categories of renewable fuel and set separate volume requirements for each one.
- EISA required EPA to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces.

Additional provisions of the EISA address energy savings in government and public institutions, research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green" jobs.

State

The discussion below focuses primarily on those policies, regulations, and laws that directly pertain to energy-related resources. Refer to Section 5.7, Greenhouse Gas Emissions, of this environmental impact report (EIR) for a discussion of various policies, regulations, and laws targeted to the reduction of GHG emissions that are expected to achieve co-benefits in the form of reduced demand for energy-related resources and enhanced efficiencies in the consumption of energy-related resources.

Warren-Alquist Act

The California Legislature passed the Warren-Alquist Act in 1974. The Warren-Alquist Act created the CEC and incorporated the following three key provisions designed to address the demand side of the energy equation:

- It directed the CEC to formulate and adopt the nation's first energy conservation standards for buildings constructed and appliances sold in California.
- It removed the responsibility of electricity demand forecasting from the utilities, which had a financial interest in high demand projections, and transferred it to a more impartial CEC.
- It directed the CEC to embark on an ambitious research and development program, with a particular focus on fostering what were characterized as non-conventional energy sources.

State of California Energy Action Plan

The CEC and CPUC approved the first State of California Energy Action Plan in 2003. The plan established shared goals and specific actions to ensure that adequate, reliable, and reasonably

priced electrical power and natural gas supplies are provided to consumers. The plan also identified policies, strategies, and actions that are cost effective and environmentally sound for California's consumers and taxpayers. In 2005, CEC and CPUC adopted a second Energy Action Plan to reflect various policy changes and actions of the prior 2 years.

At the beginning of 2008, CEC and CPUC determined that it was not necessary or productive to prepare a new energy action plan. This determination was based, in part, on a finding that the state's energy policies have been significantly influenced by the passage of Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006 (discussed below). Rather than produce a new energy action plan, CEC and CPUC prepared an update that examines the state's ongoing actions in the context of global climate change.

Senate Bill 1078 (2002)

Senate Bill (SB) 1078 established the California Renewables Portfolio Standard (RPS) Program and required that a retail seller of electricity purchase a specified minimum percentage of electricity generated by eligible renewable energy resources as defined in any given year, culminating in a 20% standard by December 31, 2017. These retail sellers include electrical corporations, community choice aggregators, and electric service providers. The bill relatedly required the CEC to certify eligible renewable energy resources, design and implement an accounting system to verify compliance with the RPS by retail sellers, and allocate and award supplemental energy payments to cover above-market costs of renewable energy.

Senate Bills 107 (2006), X1-2 (2011), 350 (2015), and 100 (2018)

SB 107 (2006) accelerated the RPS established by SB 1078 by requiring that 20% of electricity retail sales be served by renewable energy resources by 2010 (not 2017). Additionally, SB X1-2 (2011) requires all California utilities to generate 33% of their electricity from eligible renewable energy resources by 2020. Specifically, SB X1-2 sets a three-stage compliance period: by December 31, 2013, 20% had to come from renewables; by December 31, 2016, 25% had to come from renewables; and by December 31, 2020, 33% had to come from renewables.

SB 350 (2015) requires retail seller and publicly owned utilities to procure 50% of their electricity from eligible renewable energy resources by 2030, with interim goals of 40% by 2024 and 45% by 2027.

SB 100 (2018) increased the standards set forth in SB 350 by establishing targets for the total electricity sold to retail customers in California per year be secured from qualifying renewable energy sources on the following schedule: 44% by December 31, 2024; 52% by December 31, 2027; and 60% by December 31, 2030. SB 100 states that it is the policy of the state that eligible renewable

energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California. This bill requires that the achievement of 100% zero-carbon electricity resources do not increase the carbon emissions elsewhere in the western grid and that the achievement not be achieved through resource shuffling.

Consequently, utility energy generation from nonrenewable resources is expected to be reduced based on implementation of the 60% RPS in 2030. Therefore, any project's reliance on nonrenewable energy sources would also be reduced.

Assembly Bill 1007 (2005)

AB 1007 (2005) required CEC to prepare a statewide plan to increase the use of alternative fuels in California (State Alternative Fuels Plan). CEC prepared the plan in partnership with the California Air Resources Board (CARB) and in consultation with other state, federal, and local agencies. The State Alternative Fuels Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

Assembly Bill 32 (2006) and Senate Bill 32 (2016)

In 2006, the state legislature enacted AB 32, the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. In 2016, the legislature enacted SB 32, which extended the horizon year of the state's codified GHG-reduction planning targets from 2020 to 2030, requiring California to reduce its GHG emissions to 40% below 1990 levels by 2030. In accordance with AB 32 and SB 32, CARB prepares scoping plans to guide the development of statewide policies and regulations for the reduction of GHG emissions. Many of the policy and regulatory concepts identified in the scoping plans focused on increasing energy efficiencies, using renewable resources, and reducing the consumption of petroleum-based fuels (e.g., gasoline and diesel). As such, the state's GHG emissions-reduction planning framework creates co-benefits for energy-related resources. Additional information on AB 32 and SB 32 is provided in Section 5.7.2 of this EIR.

California Building Standards

Part 6 of Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. Part 6 establishes energy efficiency standards for residential and nonresidential buildings constructed in California to reduce energy demand and consumption. Part 6 is updated periodically to incorporate and consider new energy efficiency technologies and methodologies.

Title 24 also includes Part 11, the California Green Building Standards (CALGreen). CALGreen took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings, as well as schools and hospitals.

The CEC adopted the 2022 Title 24 Energy Code in August 2021, and the California Building Standards Commission approved incorporating the updated code into CALGreen in December 2021. When compared to the 2019 Title 24 Standards, the 2022 amendments include measures that will further reduce energy use in single family, multifamily, and nonresidential buildings, through the following strategies (CEC 2022, 2023b):

- New prescriptive and performance standards for electric heat pumps for space conditioning and water heating, as appropriate for the various climate zones in California
- Requirements for photovoltaic and battery storage systems for newly constructed multifamily and selected nonresidential buildings
- Updated efficiency measures for lighting, building envelope, and heating, ventilation, and air conditioning
- Improvements to reduce the energy loads of certain equipment subject to the requirements of the Energy Code that perform a commercial process that is not related to the occupant needs in the building (such as refrigeration equipment in refrigerated warehouses or air conditioning for computer equipment in data processing centers).

Integrated Energy Policy Report

CEC is responsible for preparing integrated energy policy reports that identify emerging trends related to energy supply, demand, conservation, public health and safety, and maintenance of a healthy economy. The CEC's 2015 Integrated Energy Policy Report discusses the state's policy goals to require that new residential construction be designed to achieve zero net energy standards by 2020 and that new nonresidential construction be designed to achieve zero net energy standards by 2030 (CEC 2016), which is relevant to this EIR. Refer to Section 5.7 of this EIR for additional information on the state's zero net energy objectives and how the state's achievement of its objectives would serve to beneficially reduce the proposed project's GHG emissions profile and energy consumption.

State Vehicle Standards

In response to the transportation sector accounting for more than half of California's carbon dioxide (CO_2) emissions, AB 1493 was enacted in 2002. AB 1493 required CARB to set GHG emissions

standards for passenger vehicles, light-duty trucks, and other vehicles determined by the state board to be vehicles whose primary use is noncommercial personal transportation in the state. The bill required that CARB set GHG emissions standards for motor vehicles manufactured in 2009 and all subsequent model years.

In 2012, CARB approved a new emissions-control program for model years 2017 through 2025. The program combined the control of smog, soot, and global-warming gases with requirements for greater numbers of zero-emissions vehicles into a single package of standards called Advanced Clean Cars (CARB 2012).

In March 2022, EPA reinstated California's authority under the Clean Air Act to implement its own GHG emission standards and zero-emission vehicle sales mandate. EPA's action concludes its reconsideration of the 2019 SAFE-1 rule, which sets fuel economy and carbon dioxide standards for vehicles, by finding that the actions taken under the previous administration as a part of SAFE-1 were decided in error and are now entirely rescinded.

The Advanced Clean Cars II program, which was adopted in August 2022, established the next set of low- and zero-emission vehicle requirements for model years after 2025 to contribute to meeting federal ambient air quality O3 standards and California's carbon neutrality standards (CARB 2024). The main objectives of Advanced Clean Cars II are as follows:

- Maximize criteria and GHG emission reductions through increased stringency and real-world reductions.
- Accelerate the transition to zero-emission vehicles through increased stringency of requirements and associated actions to support wide-scale adoption and use.

The Advanced Clean Cars II rulemaking package also considers technological feasibility, environmental impacts, equity, economic impacts, and consumer impacts.

Although the focus of the state's vehicle standards is on the reduction of air pollutants and GHG emissions, one co-benefit of implementation of these standards is a reduced demand for petroleum-based fuels.

Sustainable Communities Strategy

The Sustainable Communities and Climate Protection Act of 2008, or SB 375, coordinates land use planning, regional transportation plans, and funding priorities to help California meet its GHG emissions-reduction mandates. As codified in California Government Code Section 65080, SB 375 requires metropolitan planning organizations (e.g., San Diego Association of Governments) to include a sustainable communities strategy in their regional transportation plan. The main focus of

the sustainable communities strategy is to plan for growth in a fashion that will ultimately reduce GHG emissions, but the strategy is also part of a bigger effort to address other development issues, including transit and vehicle miles traveled, which influence the consumption of petroleum-based fuels.

Local

SDG&E Individual Integrated Resource Plan

SDG&E's Conforming Portfolio identifies a need for approximately 700 gigawatt-hours of incremental renewable power, in addition to the assumed increases in energy efficiency and behind-the-meter solar, to meet the 2030 planning target (approximately 4% of the total energy in the portfolio) (SDG&E 2020). SDG&E's Conforming Portfolio demonstrates that the utility has reduced its GHG emissions in the early years of the planning period, reflecting its current position in relation to its RPS targets—in 2018, approximately 45% of its energy mix came from delivering renewable resources (compared to an RPS requirement of 29%)—as well as that it has aggressively adopted energy storage and does not utilize coal resources. SDG&E is fully compliant with RPS and long-term contracting requirements. SDG&E continues its efforts to meet resource-specific renewable procurement mandates, as required, but does not expect to procure additional resources for RPS compliance purposes until after 2030. SDG&E is forecasted to reach 56% renewable energy in 2023, 100% of which will be from long-term contracts (SDG&E 2022).

City of San Diego General Plan

The following policy contained in the Conservation Element of the 2008 City of San Diego (City) General Plan (City of San Diego 2008) is applicable to the project's energy use (refer to Section 5.1, Land Use, for a consistency analysis related to goals and policies applicable to the project):

- CE-A.5. Employ sustainable or "green" building techniques for the construction and operation of buildings.

Climate Action Plan

The City adopted a Climate Action Plan (CAP) in December 2015 (City of San Diego 2015). The CAP quantifies GHG emissions, establishes citywide reduction targets for 2020 and 2035, identifies strategies and measures to reduce GHG levels, and provides guidance for monitoring progress on an annual basis. The City CAP identifies a comprehensive set of goals and actions, including ordinances, policies, resolutions, programs, and incentives, that the City can use to reduce GHG emissions. Many of these goals and actions would have the effect of reducing energy use. The City evaluates GHG significance based on a project's consistency with the City's CAP using the CAP

Consistency Regulations. As analyzed in Section 5.7, the proposed project would be consistent with City's CAP Consistency Regulations.

On August 2, 2022, the City Council adopted an update to the CAP (2022 CAP Update) (City of San Diego 2022). The 2022 CAP Update identified the following six strategies to achieve the goals and targets set forth below:

- Decarbonization of the Built Environment
- Access to Clean and Renewable Energy
- Mobility and Land Use
- Circular Economy and Clean Communities
- Resilient Infrastructure and Health Ecosystems
- Emerging Climate Actions

The 2022 CAP Update sets the target emission level for 2035 at net zero emissions (i.e., cutting GHG emissions to as close to zero as possible, with any remaining emissions balanced by removals) and sets a science-based, fair share target for 2030 (63.3% below 1990 levels), which is far stricter than the SB 32 target of 40% below 1990 levels by 2030.

5.5.3 IMPACT ANALYSIS

5.5.3.1 Issue 1: Consumption of Energy Resources

Issue 1: Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Thresholds

Consistent with CEQA Guidelines Appendix G, a project would result in a significant impact to energy conservation if it would:

- Substantially increase the consumption of electricity, natural gas, gasoline, diesel, or other non-renewable energy types such that the construction of new facilities and sources of energy or major improvements to local infrastructure would be required.

Impact Analysis

Electricity

Construction Use

Temporary electric power for as-necessary lighting and electronic equipment, such as computers, may be needed inside temporary construction trailers. However, the electricity used for such activities would be temporary and would have a negligible contribution to the proposed project's overall energy consumption.

Operational Use

The operational phase would require electricity for multiple purposes including, but not limited to, building heating and cooling, lighting, appliances, electronics, and other uses associated with the proposed project's residential land uses and art studio.

California Emissions Estimator Model (CalEEMod) (version 2020.4.0) was used to estimate project emissions from energy uses. Default electricity generation rates in CalEEMod were used (for the proposed land use and climate zone) based on compliance with 2019 Title 24. It was estimated that the proposed project would consume approximately 831,897 kWh per year. This equates to approximately 0.28 gigawatt-hours per year. In 2018, the total electricity demand for San Diego County was 19,045 gigawatt-hours (CEC 2020a).

As described above, the electricity demand calculation for the proposed project assumes compliance with Title 24 standards for 2022. The proposed project would be required to meet the California Building Energy Efficiency Standards (24 CCR 6), which improve the energy efficiency of residential and nonresidential buildings. In addition, the project would be subject to statewide mandatory energy requirements as outlined in Title 24, Part 6, of the California Code of Regulations. Title 24, Part 11, contains voluntary energy measures that are applicable to the proposed project under CALGreen. Prior to project approval, the City would ensure that the project meets Title 24 requirements applicable at that time, as required by state regulations through their plan review process.

Natural Gas

Construction Use

Natural gas is not anticipated to be required during project construction. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below under the "petroleum" subsection. Any minor amounts of natural gas that may be consumed as a result of project

construction would be minimal and would have a negligible contribution to the proposed project's overall energy consumption.

Operational Use

With implementation of Project Design Feature (PDF)-AQ-2, no natural gas will be utilized for the operation of the project.

Petroleum

Construction Use

Petroleum would be consumed throughout construction of the proposed project. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction, and vehicle miles traveled associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. Heavy-duty construction equipment associated with construction activities and haul trucks involved in relocating dirt around the project site would rely on diesel fuel. Construction workers would travel to and from the project site throughout the duration of construction. It is assumed that construction workers would travel to and from the project site in gasoline-powered vehicles.

Heavy-duty construction equipment of various types would be used during construction. CalEEMod was used to estimate construction equipment usage (refer to Appendix C of this EIR). Based on that analysis, diesel-fueled construction equipment would operate for an estimated 40,438 hours, as summarized in Table 5.5-1.

Table 5.5-1
Hours of Operation for Construction Equipment

Phase	Hours of Equipment Use
Demolition	1,008
Site Preparation	368
Grading	11,320
Building Construction	25,612
Paving	1,800
Architectural Coating	330
Total	**40,438**

Source: Appendix C.

Fuel consumption from construction equipment was estimated by converting the total emissions from each construction phase to gallons using conversion factors for CO_2 to gallons of gasoline or

diesel. The conversion factor for gasoline is 8.78 kilograms per metric ton of CO_2 per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton of CO_2 per gallon (The Climate Registry 2020). The estimated diesel fuel use from construction equipment is shown in Table 5.5-2.

Table 5.5-2
Construction Equipment Diesel Demand

Phase	Pieces of Equipment	Equipment CO_2 (MT)	kg CO_2/Gallon	Gallons
Demolition	6	71.88	10.21	7,040.46
Site Preparation	7	38.78	10.21	3,798.17
Grading	8	777.76	10.21	76,175.97
Building Construction	9	786.14	10.21	76,997.05
Paving	6	75.68	10.21	7,412.25
Architectural Coating	1	7.03	10.21	688.64
			Total	**172,113.55**

Notes: Fuel consumption from worker and vendor trips was estimated by converting the total CO_2 emissions from the construction phase to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Worker vehicles are assumed to be gasoline fueled, and vendor/hauling vehicles are assumed to be diesel fueled. Calculations for total worker, vendor, and hauler fuel consumption are provided in Table 5.5-3, Table 5.5-4, and Table 5.5-5. All other construction phases not identified in Table 5.5-3, Table 5.5-4, and Table 5.5-5 would not generate construction vehicle, vendor, or haul truck trips and are therefore not included in these tables.

Table 5.5-3
Construction Worker Vehicle Gasoline Demand

Phase	Trips	Vehicle CO_2 (MT)[a]	kg CO_2/Gallon[b]	Gallons
Demolition	673	3.31	8.78	377.05
Site Preparation	414	2.04	8.78	232.29
Grading	5,660	27.24	8.78	3,103.03
Building Construction	55,268	250.09	8.78	28,484.53
Paving	1,200	5.19	8.78	591.13
Architectural Coating	5,720	24.74	8.78	2,817.72
			Total	**35,605.75**

Notes: CO_2 = carbon dioxide; MT = metric ton; kg = kilogram.

[a] Appendix C.

[b] The Climate Registry 2020.

Table 5.5-4
Construction Vendor Diesel Demand

Phase	Trips	Vehicle CO_2 (MT)[a]	kg CO_2/Gallon[b]	Gallons
Demolition	0	0	10.21	0
Site Preparation	92	0.88	10.21	86.00
Grading	1,132	10.67	10.21	1,045.30
Building Construction	18,872	171.76	10.21	16.822.76
Paving	0	0	10.21	0
Architectural Coating	0	0	10.21	0
			Total	**17,954.01**

Notes: CO_2 = carbon dioxide; MT = metric ton; kg = kilogram.

[a] Appendix C.

[b] The Climate Registry 2020.

Table 5.5-5
Construction Haul Truck Diesel Demand

Phase	Trips	Vehicle CO_2 (MT)[a]	kg CO_2/Gallon[b]	Gallons
Demolition	8,232	6.17	10.21	604.07
Site Preparation	0	0	10.21	0
Grading	654,296	71.87	10.21	7,039.17
Building Construction	0	0	10.21	0
Paving	0	0	10.21	0
Architectural Coating	0	0	10.21	0
			Total	**7,643.24**

Notes: CO_2 = carbon dioxide; MT = metric ton; kg = kilogram.

[a] Appendix C.

[b] The Climate Registry 2020.

As shown in Tables 5.5-2 through 5.5-5, the proposed project is estimated to consume approximately 233,317 gallons of petroleum during the construction phase. In 2023, the total petroleum consumption within the County of San Diego was 1.55 billion gallons (CARB 2023). The proposed project would also be required to comply with CARB's Airborne Toxics Control Measures, which restrict heavy-duty diesel vehicle idling time to 5 minutes.

Operational Use

The majority of fuel consumption resulting from the project's operational phase would be attributable to employees, visitors, and residents traveling to and from the project site. Calculations

for annual fuel consumption are provided in Table 5.5-6. Mobile sources from the proposed project would result in approximately 182,848 gallons of gasoline per year and 7,863 gallons of diesel per year, for a total of 190,711 gallons of petroleum consumed per year beginning in 2027 after project buildout. It is forecasted that in 2027, approximately 1.44 billion gallons of petroleum will be consumed in San Diego County (CARB 2023).

Table 5.5-6
Petroleum Consumption – Operation

Fuel	Vehicle CO_2 (MT)[a]	kg CO_2/Gallon[b]	Gallons
Gasoline	1,605.41	8.78	182,848.39
Diesel	80.28	10.21	7,863.15
		Total	**190,711.54**

Notes: MT = metric ton; CO_2 = carbon dioxide; kg = kilogram.

[a] Appendix C

[b] The Climate Registry 2020.

Over the lifetime of the project, the fuel efficiency of the vehicles being used by the residents is expected to increase. As such, the amount of petroleum consumed as a result of vehicular trips to and from the project site during operation would decrease over time. There are numerous regulations in place that require and encourage increased fuel efficiency. For example, as mentioned previously, CARB has adopted an approach to passenger vehicles by combining the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. The approach also includes efforts to support and accelerate the number of plug-in hybrids and zero-emissions vehicles in California (CARB 2013). Additionally, in response to SB 375, CARB adopted the goal of reducing per-capita GHG emissions from 2005 levels by 8% by 2020 and by 18% by 2035 for light-duty passenger vehicles in the planning area for the San Diego Association of Governments. As such, the operation of the proposed project is expected to use decreasing amounts of petroleum over time due to advances in fuel economy.

Significance of Impact

Electricity

The electricity used for construction activities would be temporary and would have a negligible contribution to the proposed project's overall energy consumption. In addition, for the reasons described above, the electricity consumption of the proposed project during operation would not be inefficient or wasteful, and impacts would be less than significant.

Natural Gas

Any minor amounts of natural gas that may be consumed as a result of project construction would be minimal and would have a negligible contribution to the proposed project's overall energy consumption. No natural gas would be used for the operation of the proposed project. For the reasons described above, the natural gas consumption of the proposed project would not be inefficient or wasteful, and impacts would be less than significant.

Petroleum

Although the proposed project would increase petroleum use during operation as a result of employees and customers commuting to the site and vendor trucks, the use would be a small fraction of the countywide use and, due to efficiency increases, would diminish over time. Given the considerations described above, petroleum consumption associated with construction and operation of the proposed project would not be inefficient or wasteful and would result in a less-than-significant impact.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.5.3.2 Issue 2: Renewable Energy and Energy Efficiency Plan

Issue 2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Thresholds

Consistent with CEQA Guidelines Appendix G, a project would result in a significant impact to energy conservation if it would:

- Cause the use of large amounts of electricity and natural gas in a manner that is wasteful or otherwise inconsistent with adopted plans or policies.

Impact Analysis

Title 24 of the California Code of Regulations contains energy efficiency standards for residential and non-residential buildings based on a state mandate to reduce California's energy demand. Specifically, Title 24 addresses a number of energy efficiency measures that impact energy used for lighting, water heating, heating, and air conditioning, including the energy impact of the building envelope such as windows, doors, skylights, wall/floor/ceiling assemblies, attics, and roofs.

Part 6 of Title 24 specifically establishes energy efficiency standards for residential and non-residential buildings constructed in the State of California in order to reduce energy demand and consumption. The proposed project would comply with Title 24, Part 6, per state regulations. In addition, Title 24, Part 11, contains voluntary and mandatory energy measures that are applicable to the proposed project under CALGreen. As discussed under the previous threshold, the proposed project would result in an increased demand for electricity and petroleum. Natural gas is not anticipated to be used during construction, and with the implementation of PDF-AQ-2, no natural gas would be used during operation of the proposed project. In accordance with Title 24, Part 11, mandatory compliance, the applicant would (a) divert 50% of its construction and demolition waste from landfills, (b) include roofing materials with a minimum 3-year aged solar reflection and thermal emittance or solar reflection index equal to or greater than the values specified in the voluntary measures under CALGreen (this may include green roofs), (c) use low pollutant-emitting exterior and interior finish materials, and (d) include low-flow fixtures and appliances. Compliance with all of these mandatory measures would decrease the consumption of electricity and petroleum. Additionally, irrigation of the project site, where practical, would use reclaimed water applied via low precipitation rate spray heads, drip emitters, or other highly efficient systems.

In accordance with the City's General Plan Conservation Element, the project would reduce its environmental footprint through a variety of sustainable features and compliance with the Uniform Building Code and Title 24 requirements for building materials and insulation in order to reduce unnecessary loss of energy.

Significance of Impact

Because the proposed project would comply with Title 24, Part 6 and Part 11 and would be consistent with the City's General Plan Conservation Element policies pertaining to energy use, no conflict with existing energy standards and regulations would occur. Therefore, impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

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5.6 GEOLOGIC CONDITIONS

This section describes the existing geological conditions on the proposed Renzulli Estates Project (project) site, identifies associated regulatory requirements, and evaluates potential impacts related to the implementation of the project. The following discussion is based on the geotechnical investigation and subsequent memo, prepared by Advanced Geotechnical Solutions Inc. (March 2023) and included as Appendices E1 and E2 of this environmental impact report.

5.6.1 EXISTING CONDITIONS

Physical Conditions

The project site consists of 40.56 acres located within the Scripps Miramar Ranch Community. The surrounding area is characterized by residential development to the north, west, and northeast, undeveloped open space to the south, and Cypress Canyon Park to the east. The project site is primarily undeveloped but features a large residence, several outbuildings, and two associated sheds. The center of the site includes a cleared, paved area, and disturbed habitat surrounds the existing structures, consistent with the natural and developed features of the surrounding area.

Soils and Geologic Conditions

Topographically, the project site consists of gently to moderately sloping terrain. According to the geotechnical investigation, the project site is underlain by Tertiary-aged sedimentary bedrock of the Poway Group and associated residual soils, artificial fill, alluvium, colluvium, slope wash, questionable landslides, and residual soils, which are all described below.

Poway Group (Tst, Tmv, Tp)

Sedimentary bedrock of the Poway Group formations comprise the underlying surficial deposits located within the project site. The Poway Group formations include Stadium Conglomerate (Tst), Mission Valley Formation (Tmv), and Pomerado Conglomerate (Tp). Furthermore, these formations are composed of massively bedded, very dense tan and light brown, silty and clayey sandstones, and gravel and cobble conglomerate in a clayey sand matrix.

Artificial Fill (Qafu, Qafd)

The project site features both undocumented artificial fill (Qafu) and engineered artificial fill (Qafd).

Undocumented artificial fill soils were used to construct the level pad east of the existing residence and other minor building pads and roads. It is estimated that these fills reach a maximum thickness of 98 feet and consist of mixtures of silty to clayey sands; sandy clays; oversize rocks; and pockets of

construction demolition materials, which included large concrete debris, crushed asphalt pavement, oil-stabilized sand and gravel, rebar, wood, and organic waste.

Engineered artificial fill soils are located in the north central canyon area and are estimated to reach a thickness of 245 feet at the northern end of the project site and 20 feet where the engineered canyon fills and undocumented fill slope meet. These materials consist of tan, medium dense to dense, clayey sands with gravel and cobbles, and dense to hard, dark brown, clayey sand and sandy clay with gravel.

Alluvium (Qal)

Alluvium is present in the southern portion of the project site at the bottom of a small reservoir. Where encountered, these deposits have a maximum thickness of 10 feet to 20 feet and primarily consist of loosely compacted, stream-deposited sands and clayey sands. Currently, these soils are not suitable to support development.

Colluvium (Qc)

Colluvial soils are located on mid- to lower-northern canyon slopes and are the result of erosion by sheet flow and gravitational processes. Colluvium generally consists of loosely compacted clayey sands, silty sands, and clays. The thickness of these soils within the project site are unknown. However, they are estimated to reach a thickness of 5 feet or more in certain areas.

Slope Wash (Qsw)

Slope wash was encountered on most of the undisturbed canyon wall terrain. These deposits consist of primarily dark, reddish brown, loose, silty sand, including gravel and cobbles, and are estimated to reach a thickness ranging from 1 feet to 3 feet.

Questionable Landslide (Qls?)

Near the base of a canyon slope at the northwestern portion of the project site features the possibility of a small possible or “questionable landslide.” However, the feature lacks geomorphic evidence indicative of a deep-seated landslide, and thus cannot be confirmed.

Residual Soil

Formational materials within the project site are covered by an intermittent layer of residual soil. The residual soils consist of dark brown, firm to stiff, sandy clay and reach thicknesses ranging from 1 foot to 5 feet in certain areas. Residual soils are highly expansive and not suitable to support development.

Geologic Hazards

Faulting and Seismicity

According to the Public Facilities, Services, and Safety Element of the City of San Diego (City) General Plan, faults influencing local seismicity within the City include the Elsinore, San Jacinto, Coronado Bank, San Diego Trough, San Clemente, and La Nación Faults. In addition, the downtown area of the City is underlain by the active Rose Canyon Fault. Further, local geologic maps show that most neighborhoods in the City are underlain by numerous smaller faults. Being situated in such proximity to large faults creates a significant seismic risk to the City (City of San Diego 2018).

According to the geotechnical investigation, no faults have been mapped within, or in close proximity to, the project site. The nearest known active fault to the project site is the Rose Canyon/Newport–Inglewood Fault system, which is located approximately 11.67 miles west of the project site. Historically, earthquakes that occurred near the Newport–Inglewood Fault have had a maximum magnitude of 7.5, while the maximum earthquake magnitude near Rose Canyon Fault was 6.9 (USGS 2014). Damage to structures and improvements caused by a major earthquake would depend on the distance to the epicenter, the magnitude of the event, the underlying soil, and the quality of construction (City of San Diego 2018).

Liquefaction

Liquefaction typically occurs when a site is located in a zone with seismic activity, on-site soils are cohesionless, groundwater is encountered within 50 feet of the surface, and soil densities are less than about 70% of the maximum dry densities. Liquefaction can result in ground deformations, loss of shear strength, lateral spread, dynamic settlement, and flow failure.

As discussed in the geotechnical investigation, the potential risk for liquefaction at the project site is considered to be low, as the project site is not located within a State liquefaction susceptibility zone. The drainage areas within the project site contain soil layers that are susceptible to liquefaction, but the risk at the site is considered remote.

Landslides

According to the City's General Plan, landslides constitute significant hazard risks within the City (City of San Diego 2018). As previously discussed, the project site is underlain by dense sandstone and conglomerate formational materials. As such, the potential of a seismically induced landslide to occur within the project site is considered to be very low. Furthermore, no evidence of deep-seated landslide deposits was encountered at the project site during the geotechnical investigation

(Appendix E1 and Appendix E2). Nonetheless, as discussed above, one "questionable" landslide is present on site.

Expansive Soils

Expansive soils are clay soils that expand in volume with an increase in moisture content. Existing soils at the project site have been identified as being expansive in nature, according to the 2016 California Building Code (CBC). Soil samples collected and tested for expansion index in the geotechnical investigation indicate that the expansion potential of on-site materials range from "low" to "high" (Appendix E1 and Appendix E2).

Tsunamis and Seiches

Tsunamis consist of a series of long-period ocean waves generated by sources such as underwater earthquakes, volcanic eruptions, or slope failures. Associated potential impacts include coastal inundation and water- or debris-related structural damage. Because the project site is located approximately 11.3 miles inland, the potential for on-site tsunami hazards is considered low.

Seiches are defined as wave-like sloshing movements in enclosed or semi-enclosed bodies of water such as lakes or reservoirs and are most typically associated with seismic activity. Seiches can result in flooding damage and related effects (e.g., erosion) in surrounding areas from spilling or sloshing water, as well as increased pressure on containment structures. Because the project site's distance from an upstream large body of water, the potential for a seiche to occur within or near the project site is unlikely.

Groundwater

No groundwater was encountered in the exploratory borings performed during the geotechnical investigation, except for one sonic boring in which the drill casing was observed to be wet during drilling at an approximate depth of 75 feet. However, a bailer was lowered to 100 feet depth at the completion of the boring, and no groundwater was encountered (Appendix E1). Groundwater is not expected to occur on site with the exception of potential seepage at the boundary between fill and formational materials. Intermittent seepage was encountered near the boundary between the undocumented canyon fill located in the north central portion of the project site and the documented fill soils located on the adjacent property north of the project site. Furthermore, groundwater level is expected to fluctuate due to precipitation, irrigation practices, infiltration water from adjacent properties, and other unforeseen factors.

5.6.2 REGULATORY FRAMEWORK

Federal

International Building Code

The International Building Code is a model building code developed by the International Code Council. It has been adopted for use as a base code standard by most jurisdictions in the United States. The code provisions are intended to protect public health and safety while avoiding both unnecessary costs and preferential treatment of specific materials or methods of construction.

U.S. Geological Survey National Landslide Hazards Program

In fulfillment of the requirements of Public Law 106-113, the U.S. Geological Survey created the National Landslide Hazards Program in the mid-1970s. According to the U.S. Geological Survey, the primary objective of the National Landslide Hazards Program is to reduce long-term losses from landslide hazards by improving understanding of the causes of ground failure and suggesting mitigation strategies. The federal government takes the lead role in funding and conducting this research, whereas the reduction of losses due to geologic hazards is primarily a state and local responsibility.

State

Alquist–Priolo Earthquake Fault Zoning Act

The Alquist–Priolo Earthquake Fault Zoning Act (Alquist–Priolo Act) was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. In accordance with this act, the state geologist established regulatory zones, called "earthquake fault zones," around the surface traces of active faults, and published maps showing these zones. Earthquake fault zones are designated by the California Geologic Survey and are delineated along traces of faults where mapping demonstrates that surface fault rupture has occurred within the past 11,700 years. Construction within these zones cannot be permitted until a geologic exploration has been conducted to prove that a building planned for human occupancy would not be constructed across an active fault. These types of site evaluations address the precise location and recency of rupture along traces of the faults and are typically based on observations made in trenches excavated across fault traces.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 (California Public Resources Code, Chapter 7.8, Section 2690 et seq.) directs the California Geologic Survey to protect the public from earthquake-induced

liquefaction and landslide hazards (these hazards are distinct from fault surface rupture hazard, which is regulated by the Alquist–Priolo Act). This act requires the state geologist to delineate various seismic hazard zones and requires cities, counties, and other local permitting agencies to regulate certain development projects within these zones (i.e., zones of required investigation). Before a development permit may be granted for a site within a seismic hazard zone, a geotechnical exploration of the site must be conducted and appropriate mitigation measures incorporated into the design of proposed projects. Evaluation and mitigation of potential risks from seismic hazards within zones of required investigation must be conducted in accordance with the Guidelines for Evaluating and Mitigating Seismic Hazards in California, adopted by the State Mining and Geology Board on March 13, 1997, and updated in 2008 (CGS 2008).

As of 2012, Seismic Hazard Zone Maps had been prepared for portions of populated areas of Southern California and the San Francisco Bay Area; however, the project site is not located on these Seismic Hazard Zone Maps (CGS 2021). As a result, the provisions of the Seismic Hazards Mapping Act would not apply to the project.

California Building Code

The CBC (24 CCR Part 2) is administered by the California Building Standards Commission, which is responsible for coordinating all building standards. Under state law, all building standards must be centralized in Title 24 or they are not enforceable. The purpose of the CBC is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress, and general stability by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all building and structures within its jurisdiction. The CBC is based on the International Building Code, published by the International Code Conference. The CBC contains California amendments based on the American Society of Civil Engineers Minimum Design Standards 7-05, which provides requirements for general structural design and includes means for determining earthquake loads and other loads (such as wind loads) for inclusion into building codes. The provisions of the CBC apply to the construction, alteration, movement, replacement, and demolition of every building or structure, or any appurtenances connected or attached to such buildings or structures throughout California.

Local

City of San Diego Municipal Code (Seismic Safety Maps)

San Diego Municipal Code Article 5, Division 18, Section 145.1803 and Appendix D of the City Land Development Manual outline specific requirements related to the nature and level of required geotechnical investigations for new development. Requirements include incorporation of appropriate recommendations for mitigation of geologic hazards, when identified, and

incorporation of these recommendations into the design of the project, before issuance of a building permit. In addition to the regulatory standards listed above, City requirements related to geologic and geotechnical issues include obtaining a grading permit (San Diego Municipal Code Article 9, Division 6, Section 129.0601, et seq.), and conformance with applicable elements of the City Storm Water Standards Manual and related documents (San Diego Municipal Code Article 3, Division 3, Section 43.0301, et seq.), with stormwater standards discussed in more detail in Section 5.10, Hydrology, and Section 5.18, Water Quality, of this environmental impact report.

City of San Diego General Plan

The Public Facilities, Services and Safety Element of the City General Plan (2018) identifies a number of applicable policies related to seismic, geologic, and structural considerations. Specifically, Policies PF-Q.1 and PF-Q.2 include measures regarding conformance with state laws related to seismic and geologic hazards, conducting/reviewing geotechnical investigations, and maintaining structural integrity with respect to geologic hazards.

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.

b. Maintain updated citywide maps showing faults, geologic hazards, and land use capabilities, and related studies used to determine suitable land uses.

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.

d. Utilize the findings of a beach and cliff erosion survey to determine the appropriate rate and amount of coastline modification permissible in the City.

e. Coordinate with other jurisdictions to establish and maintain a geologic “data bank” for the San Diego area.

f. Regularly review local lifeline utility systems to ascertain their vulnerability to disruption caused by seismic or geologic hazards and implement measures to reduce any vulnerability. g. Adhere to state laws pertaining to seismic and geologic hazards.

PF-Q.2. Maintain or improve integrity of structures to protect residents and preserve communities.

a. Abate structures that present seismic or structural hazards with consideration of the desirability of preserving historical and unique structures and their architectural appendages, special geologic and soils hazards, and the socio-economic consequences of the attendant relocation and housing programs.

b. Continue to consult with qualified geologists and seismologists to review geologic and seismic studies submitted to the City as project requirements.

c. Support legislation that would empower local governing bodies to require structural inspections for all existing pre-Riley Act (1933) buildings, and any necessary remedial work to be completed within a reasonable time.

5.6.3 IMPACT ANALYSIS

5.6.3.1 Issue 1: Geologic Hazards such as Earthquakes, Landslides, Mudslides, Ground Failure

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

Thresholds

Based on the City's Significance Determination Thresholds (City of San Diego 2022), impacts related to geology and soils would be significant if a project would:

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

Impact Analysis

Surface/Fault Rupture

According to the results of the geotechnical investigation (Appendix E1 and Appendix E2), the closest known active faults are the Rose Canyon and Newport–Inglewood Fault Systems, which are located approximately 11.6 miles west of the project site and are dominant sources of potential ground motion. No known faults have been mapped within the project site. As such, the potential for surface fault rupture to occur within the project site it very low (Appendix E1 and Appendix E2).

Given the distance of the nearest fault, the project would not expose people or structures to potential substantial adverse effects associated with the rupture of a known earthquake fault.

Furthermore, all proposed residences and structures on site would be designed and constructed in accordance with the CBC guidelines and would implement design recommendations included in the geotechnical investigation (Appendix E1 and Appendix E2).

Landslides

As discussed in Section 5.6.1, no evidence of deep-seated landslide deposits was encountered at the site during the geotechnical investigation (Appendix E1 and Appendix E2). Additionally, the project would be designed in accordance with the latest CBC, which would minimize potential risks associated with landslides.

Liquefaction and Dynamic Settlement

As discussed in Section 5.6.1, liquefaction typically occurs when a site is located in a zone with seismic activity, on-site soils are cohesionless, groundwater is encountered within 50 feet of the surface, and soil densities are less than about 70% of the maximum dry densities. Per the geotechnical investigation, the potential for liquefaction and dynamic settlement at the site is considered to be low due to the dense formational material underlying the project site, and remedial grading is recommended (Appendix E1 and Appendix E2).

Tsunamis and Seiches

As previously described, the project site is located approximately 11.3 miles inland and is not located near or downstream of surface water bodies susceptible to seiche effects. As a result, no impacts related to tsunami and seiche hazards are expected to occur.

Significance of Impact

Per the geotechnical investigation, no soils or geologic conditions were encountered that would preclude the development of the project site as proposed, with incorporation of the recommendations outlined in the geotechnical investigation (Appendix E1 and Appendix E2). Furthermore, the project would be required to comply with the requirements of the latest CBC, which would further reduce impacts related to geologic hazards. Nonetheless, the construction plans for the project have not yet been finalized. Once the construction plans are submitted to the City, the applicant shall prepare a more detailed geotechnical investigation to ensure compliance with regulations and existing geologic conditions on site as a standard condition of approval. With the implementation of the recommendations and appropriate building design measures consistent with the International Building Code/CBC, the risk of potential effects from geologic hazards would be reduced to an acceptable level of risk. Therefore, impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.6.3.2 Issue 2: Wind or Water Erosion of Soils

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

Thresholds

Based on the City's Significance Determination Thresholds (City of San Diego 2022), impacts related to geology and soils would be significant if a project would:

- Result in a substantial increase in wind or water erosion of soils.

Impact Analysis

Potential erosion and sedimentation impacts would be temporarily increased during proposed construction, through activities such as excavation, grading, and removal of surface stabilizing features (e.g., vegetation and pavement). Extensive or prolonged erosion can result in effects such as damaging or destabilizing slopes, soil loss, and deposition of eroded material in roadways or drainage structures. In addition, off-site transport of sediment can potentially result in effects to downstream receiving water quality, such as increased turbidity and the provision of a transport mechanism for other contaminants that tend to adhere to sediment particles (e.g., hydrocarbons). Additional discussion of potential water quality effects related to erosion and sedimentation is provided in Section 5.18, Water Quality.

Developed areas would be most susceptible to erosion between the beginning of grading/construction and the installation of pavement or the establishment of permanent cover in landscaped areas. However, developed areas introduced on site under the project would be stabilized through the installation of structures/hardscape, and landscaping.

Short-term erosion and sedimentation impacts would be addressed through conformance with applicable elements of the City stormwater program. Specifically, this would entail conformance with applicable City regulatory codes as outlined in Section 5.6.2, Regulatory Framework, as well as the National Pollutant Discharge Elimination System Construction General Permit. Pursuant to the discussion of construction-related water quality concerns in Section 5.18, this would entail implementing an approved construction stormwater pollution prevention plan and related plans and best management practices, including appropriate measures to address erosion and sedimentation. In addition, proper drainage on site would be maintained during construction to

prevent ponding and recommended remedial measures outlined in the geotechnical investigation would prevent erosion to graded areas. A stormwater quality management plan (included as Appendix I1) would be implemented to address stormwater during operation of the project. Refer to Section 5.10, Hydrology, for additional details regarding anticipated changes in flow.

Significance of Impact

Based on implementation of appropriate erosion and sediment control best management practices as part of, and in conformance with, an approved stormwater quality management plan, stormwater pollution prevention plan, and related City requirements, associated potential erosion and sedimentation impacts as a result of the project would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.6.3.3 Issue 3: Unstable Geologic Unit or Soil

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?

Thresholds

Based on the City Significance Determination Thresholds (City of San Diego 2022), impacts related to geology and soils would be significant if a project would:

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

Impact Analysis

As outlined in Section 5.6.1 above, and the geotechnical investigation, the project site is underlain by Tertiary-aged sedimentary bedrock of the Poway Group and associated artificial fill, alluvium, colluvium, slope wash, questionable landslides, and residual soils. Residual soils on site are considered highly expansive. The expansion potential for other on-site materials ranges from “low” to “high.” As stated in the geotechnical investigation, soils determined unsuitable, including artificial fill, alluvium, slope wash, and residual soil, to support the proposed development would require removal and recompaction or artificial fill. In addition, as discussed above, the potential for liquefaction or landslides to occur on site is considered very low, and the proposed cut slopes and

fill slopes would be surficially stable and would not create collapse issues. The project would be required to implement the recommendations included in the geotechnical investigation, which include structural design recommendations for residential development that would minimize impacts associated with potential on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. Additionally, the project would not be approved or built without adequately demonstrating compliance with the CBC and applicable geologic hazards regulations.

Significance of Impact

Thorough implementation of associated design/construction recommendations set forth in the geotechnical investigation and mandatory conformance with applicable regulatory/industry standard and codes, including the International Building Code/CBC and pertinent City criteria, would reduce the risk of potential effects from geologic hazards to acceptable levels. As a standard condition of approval for grading and construction permits, the applicant shall prepare a detailed final geotechnical investigation to ensure compliance with regulations and existing geologic conditions on site. Therefore, impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.7 GREENHOUSE GAS EMISSIONS

This section describes the existing greenhouse gas (GHG) emissions for the proposed Renzulli Estates Project (project) site, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to the implementation of the project. The following discussion is based on the Greenhouse Gas Technical Report (July 2025), which is included as Appendix F.

5.7.1 EXISTING CONDITIONS

Existing Physical Conditions

The 40.56-acre project site is located in the Scripps Miramar Ranch Community Plan (Community Plan) Area within the City of San Diego . The project site primarily consists of undeveloped land, with the exception of an existing large residence, several outbuildings, and two associated structures. Surrounding land uses include residential development and Cypress Canyon Park to the east of the project site.

Since the existing residence is vacant, no existing emissions occur from on-site activities. Therefore, it is assumed that no cars are traveling to or from the site and the site is not being maintained.

Climate Change Overview

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, that lasts for an extended period of time (typically decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system. Many factors, both natural and human, can cause changes in Earth's energy balance, including variations in the Sun's energy reaching Earth, changes in the reflectivity of Earth's atmosphere and surface, and changes in the greenhouse effect, which affects the amount of heat retained by Earth's atmosphere (EPA 2025).

The greenhouse effect is the trapping and buildup of heat in the atmosphere near the Earth's surface (troposphere). The greenhouse effect traps heat in the troposphere through a threefold process as follows: short-wave radiation emitted by the Sun is absorbed by the Earth, the Earth emits a portion of this energy in the form of long-wave radiation, and GHGs in the upper atmosphere absorb this long-wave radiation and emit it into space and toward the Earth. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature and creates a pleasant, livable environment on Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise.

The scientific record of the Earth's climate shows that the climate system varies naturally over a wide range of time scales and that, in general, climate changes prior to the Industrial Revolution in the 1700s can be explained by natural causes, such as changes in solar energy, volcanic eruptions, and natural changes in GHG concentrations. Recent climate changes, in particular the warming observed over the past century, however, cannot be explained by natural causes alone. Rather, it is extremely likely that human activities have been the dominant cause of that warming since the mid-20th century and are the most significant driver of observed climate change (EPA 2025; IPCC 2013). Human influence on the climate system is evident from the increasing GHG concentrations in the atmosphere, positive radiative forcing, observed warming, and improved understanding of the climate system (IPCC 2013). The atmospheric concentrations of GHGs have increased to levels unprecedented in the last 800,000 years, primarily from fossil fuel emissions and secondarily from emissions associated with land use changes (IPCC 2013).

Greenhouse Gases

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. GHGs include, but are not limited to, carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), ozone (O_3), water vapor, black carbon, aerosols, hydrofluorocarbons (HFCs), hydrochlorofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Some GHGs, such as CO_2, CH_4, and N_2O, occur naturally and are emitted to the atmosphere through natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Manufactured GHGs, which have a much greater heat-absorption potential than CO_2, include fluorinated gases (e.g., HFCs, hydrochlorofluorocarbons, perfluorocarbons, and sulfur hexafluoride), which are associated with certain industrial products and processes.

Global Warming Potential

Gases in the atmosphere can contribute to climate change both directly and indirectly. Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the Earth (EPA 2025). The Intergovernmental Panel on Climate Change developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP of a GHG is defined as the ratio of the time-integrated radiative forcing from the instantaneous release of 1 kilogram of a trace substance relative to that of 1 kilogram of a reference gas (IPCC 2014). The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons (MT) of carbon dioxide equivalent (CO_2e).The current version of the California Emissions Estimator Model (Version 2020.4.0) assumes that the GWP for CH_4 is 25 (so emissions of 1 MT of CH_4 are equivalent to

emissions of 25 MT of CO_2) and the GWP for N_2O is 298, based on the Intergovernmental Panel on Climate Change Fourth Assessment Report (IPCC 2007). The GWP values identified in the California Emissions Estimator Model were applied to the project.

5.7.2 REGULATORY FRAMEWORK

Federal

Massachusetts v. U.S. Environmental Protection Agency

In *Massachusetts v. U.S. Environmental Protection Agency (EPA)* (April 2007), the U.S. Supreme Court directed the EPA administrator to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. In December 2009, the administrator signed a final rule with the following two distinct findings regarding GHGs under Section 202(a) of the Clean Air Act:

- The administrator found that elevated concentrations of GHGs—CO_2, CH_4, N_2O, HFCs, perfluorocarbons, and sulfur hexafluoride—in the atmosphere threaten the public health and welfare of current and future generations. This is the "endangerment finding."
- The administrator further found that the combined emissions of GHGs—CO_2, CH_4, N_2O, and HFCs—from new motor vehicles and new motor vehicle engines contribute to the GHG air pollution that endangers public health and welfare. This is the "cause or contribute finding."

These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the Clean Air Act.

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 (December 2007), among other key measures, would do the following, which would aid in the reduction of national GHG emissions (EPA 2007):

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

Federal Vehicle Standards

In response to the *Massachusetts v. EPA* ruling, the George W. Bush administration issued Executive Order (EO) 13432 in 2007 directing EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011. In 2010, EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012 through 2016 (75 FR 25324-25728).

In 2010, President Obama issued a memorandum directing the Department of Transportation, Department of Energy, EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG emissions reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, EPA and NHTSA proposed stringent, coordinated federal GHG emissions and fuel economy standards for model years 2017 through 2025 light-duty vehicles. The proposed standards are projected to achieve 163 grams/mile of CO_2 in model year 2025, on an average industry-fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017 through 2021 (77 FR 62624–63200).

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014 through 2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6% to 23% over the 2010 baselines (76 FR 57106-57513).

In August 2016, EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types of sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion MT and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program (EPA and NHTSA 2016).

In 2019, the EPA and the NHTSA published the Safer Affordable Fuel-Efficient Vehicles Rule Part One: One National Program (84 FR 51310), which revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle (ZEV) mandates in California. In March 2020, Part Two was issued, which set CO_2 emissions standards and Corporate Average Fuel Economy standards for passenger vehicles and light-duty trucks for model years 2021 through 2026.

On December 21, 2021, the NHTSA finalized the Corporate Average Fuel Economy Preemption rulemaking to withdraw its portions of the Part One Rule. The final rule concluded that the Part One Rule overstepped the agency's legal authority and established overly broad prohibitions that did not account for a variety of important state and local interests. Then, in March 2022, the NHTSA established new fuel economy standards that would require an industry-wide fleet average of approximately 49 miles per gallon for passenger cars and light trucks by model year 2026 by increasing fuel efficiency by 8% annually for model years 2024 and 2025, and 10% annually for model year 2026.

State

Executive Order S-3-05

EO S-3-05 (June 2005) established the following statewide goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050.

Assembly Bill 32 and the Climate Change Scoping Plan

In furtherance of the goals established in EO S-3-05, the California State Legislature enacted Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020.

Under AB 32, the California Air Resources Board (CARB) is responsible for and is recognized as having the expertise to carry out and develop the programs and requirements necessary to achieve the GHG emissions reduction mandate of AB 32. Under AB 32, CARB must adopt regulations requiring the reporting and verification of statewide GHG emissions from specified sources. This program is used to monitor and enforce compliance with established standards. CARB also is required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions. AB 32 also authorizes CARB to adopt market-based compliance mechanisms to meet the specified requirements. Finally, CARB is ultimately responsible for monitoring compliance and enforcing any rule, regulation, order, emission limitation, emission reduction measure, or market-based compliance mechanism adopted.

In 2007, CARB approved a limit on the statewide GHG emissions level for year 2020 consistent with the determined 1990 baseline (427 million MT CO_2e). CARB's adoption of this limit is in accordance with the California Health and Safety Code, Section 38550.

Further, in 2008, CARB adopted the Climate Change Scoping Plan: A Framework for Change (Scoping Plan) in accordance with the California Health and Safety Code, Section 38561. The Scoping Plan establishes an overall framework for the measures that would be adopted to reduce California's GHG emissions for various emission sources/sectors to 1990 levels by 2020 (CARB 2008). The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team early actions and additional GHG reduction features by both entities, identifies additional measures to be pursued as regulations, and outlines the role of a cap-and-trade program. The key elements of the Scoping Plan include the following (CARB 2008):

1. Expanding and strengthening existing energy efficiency programs as well as building and appliance standards.
2. Achieving a statewide renewable energy mix of 33%.
3. Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85% of California's GHG emissions.
4. Establishing targets for transportation-related GHG emissions for regions throughout California and pursuing policies and incentives to achieve those targets.
5. Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard.
6. Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.

In the Scoping Plan, CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of approximately 29% from the otherwise projected 2020 emissions level (i.e., those emissions that would occur in 2020, absent GHG-reducing laws and regulations [referred to as "business-as-usual"]). For purposes of calculating this percent reduction, CARB assumed that all new electricity generation would be supplied by natural gas plants, no further regulatory action would impact vehicle fuel efficiency, and building energy efficiency codes would be held at 2005 standards.

In the 2011 Final Supplement to the Scoping Plan's Functional Equivalent Document (Final Supplement), CARB revised its estimates of the projected 2020 emissions level in light of the

economic recession and the availability of updated information about GHG reduction regulations (CARB 2011a). Based on the new economic data, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of 22% (down from 29%) from the business-as-usual conditions. When the 2020 emissions level projection was updated to account for newly implemented regulatory measures, including Pavley I (model years 2009 through 2016) and the Renewables Portfolio Standard (RPS) (12% to 20%), CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of 16% (down from 29%) from the business-as-usual conditions.

In 2014, CARB adopted the First Update to the Climate Change Scoping Plan: Building on the Framework (First Update). The stated purpose of the First Update is to "highlight California's success to date in reducing its GHG emissions and lay the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80% below 1990 levels by 2050" (CARB 2014). The First Update found that California was on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80% below 1990 levels by 2050 if the state realized the expected benefits of existing policy goals.

In conjunction with the First Update, CARB identified "six key focus areas comprising major components of the state's economy to evaluate and describe the larger transformative actions that will be needed to meet the state's more expansive emission reduction needs by 2050" (CARB 2014). Those six areas are energy, transportation (e.g., vehicles/equipment, sustainable communities, housing, fuels, infrastructure), agriculture, water, waste management, and natural and working lands. The First Update identifies key recommended actions for each sector that will facilitate the achievement of EO S-3-05's 2050 reduction goal (CARB 2014).

Based on CARB's research efforts presented in the First Update, it has a "strong sense of the mix of technologies needed to reduce emissions through 2050" (CARB 2014). Those technologies include energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies (CARB 2014).

As part of the First Update, CARB recalculated the state's 1990 emissions level using more recent GWPs identified by the Intergovernmental Panel on Climate Change. Using the recalculated 1990 emissions level (431 million MT CO_2e) and the revised 2020 emissions level projection identified in the 2011 Final Supplement, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of approximately 15% (instead of 29% or 16%) from the business-as-usual conditions (CARB 2014).

On January 20, 2017, CARB released the 2017 Climate Change Scoping Plan Update (Second Update) for public review and comment (CARB 2017). This update proposed CARB's strategy for achieving the state's 2030 GHG target as established in Senate Bill (SB) 32 (discussed below), including continuing the cap-and-trade program through 2030. The Second Update incorporated approaches to cutting short-lived climate pollutants (SLCPs) under the Short-Lived Climate Pollutant Reduction Strategy (a planning document adopted by CARB in March 2017; SLCP Reduction Strategy) and acknowledged the need for reducing emissions in agriculture and highlighted the work underway to ensure that California's natural and working lands increasingly sequester carbon (CARB 2017). During the development of the Second Update, CARB held a number of public workshops in the natural and working lands, agriculture, energy, and transportation sectors (CARB 2017). When discussing project-level GHG emissions reduction actions and thresholds, the Second Update stated, "Achieving net zero increases in GHG emissions, resulting in no contribution to GHG impacts, may not be feasible or appropriate for every project, however, and the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under [the California Environmental Quality Act (CEQA)]" (CARB 2017). The Second Update was approved by CARB's Governing Board on December 14, 2017.

On November 16, 2022, CARB released the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic greenhouse gas emissions by 85% below 1990 levels no later than 2045, as directed by Assembly Bill 1279 (CARB 2022).

Executive Order B-30-15

EO B-30-15 (April 2015) identified an interim GHG reduction target in support of targets previously identified under EO S-3-05 and AB 32. EO B-30-15 set an interim target goal of reducing statewide GHG emissions to 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing statewide GHG emissions to 80% below 1990 levels by 2050, as set forth in EO S-3-05. To facilitate achievement of this goal, EO B-30-15 called for an update to CARB's Scoping Plan to express the 2030 target in terms of millions of MT CO_2e. The EO also called for state agencies to continue to develop and implement GHG emission reduction programs in support of the reduction targets. EO B-30-15 does not require local agencies to take any action to meet the new interim GHG reduction target.

Senate Bill 32 and Assembly Bill 197

SB 32 and AB 197 (enacted in 2016) are companion bills that set a new statewide GHG reduction target, made changes to CARB's membership and increased legislative oversight of CARB's climate

change-based activities, and expanded dissemination of GHG and other air-quality-related emissions data to enhance transparency and accountability. More specifically, SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the California State Senate and three members of the California State Assembly, in order to provide ongoing oversight over the implementation of the state's climate policies. AB 197 also added two members of the California State Legislature to CARB as nonvoting members; required CARB to make available and update (at least annually through its website) emissions data for GHGs, criteria air pollutants, and toxic air contaminants from reporting facilities; and required CARB to identify specific information for GHG emissions reduction measures when updating the Scoping Plan.

Senate Bill 605 and Senate Bill 1383

SB 605 (2014) required CARB to complete a comprehensive strategy to reduce emissions of SLCPs in the state, and SB 1383 (2016) required CARB to approve and implement the SLCP Reduction Strategy. SB 1383 also established specific targets for the reduction of SLCPs (40% below 2013 levels by 2030 for CH_4 and HFCs, and 50% below 2013 levels by 2030 for human-caused black carbon) and provided direction for reductions from dairy and livestock operations and landfills. Accordingly, and as mentioned above, in March 2017 CARB adopted its SLCP Reduction Strategy, which established a framework for the statewide reduction of emissions of black carbon, CH_4, and fluorinated gases.

Executive Order B-55-18

EO B-55-18 (September 2018) established a new statewide goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." This EO directed CARB to "work with relevant state agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal."

Title 24, Part 6 of the California Code of Regulations

Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically establishes Building Energy Efficiency Standards that are designed to ensure that new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every few years by the Building Standards Commission and the California Energy Commission (CEC) (and revised if necessary) (California Public Resources Code, Section 25402[b][1]). The regulations receive input from members of industry, as well as the public, with the goal of "reducing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (California Public Resources Code,

Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (California Public Resources Code, Section 25402[d]), and cost effectiveness (California Public Resources Code, Sections 25402[b][2] and 25402[b][3]). These standards are updated to consider and incorporate new energy-efficient technologies and construction methods. As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment. The 2019 standards continued to improve upon the 2016 standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The 2022 standards went into effect on January 1, 2023.

Title 24, Part 11 of the California Code of Regulations

In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (24 CCR 11), commonly referred to as CALGreen, establishes minimum mandatory standards and voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. CALGreen took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings, schools, and hospitals. The CALGreen 2022 standards went into effect on January 1, 2023, and continue to improve on the 2019 CALGreen standards for new construction of, and additions and alterations to, residential and nonresidential buildings.

Title 20 of the California Code of Regulations

Title 20 of the California Code of Regulations requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. Performance of appliances must be certified through CEC to demonstrate compliance with standards. New appliances regulated under Title 20 include refrigerators, refrigerator-freezers, and freezers; room air conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwashers; clothes washers and dryers; cooking products; electric motors; low-voltage dry-type distribution transformers; power supplies; televisions and consumer audio and video equipment; and battery charger systems. Title 20 presents protocols for testing for each type of appliance covered under the regulations, and appliances must meet the standards for energy performance, energy design, water performance, and water design. Title 20 contains three types of standards for appliances: federal and state standards for federally regulated appliances, state standards for federally regulated appliances, and state standards for non-federally regulated appliances.

Assembly Bill 1109

Enacted in 2007, AB 1109 required the CEC to adopt minimum energy efficiency standards for general-purpose lighting to reduce electricity consumption by 50% for indoor residential lighting and 25% for indoor commercial lighting.

Senate Bill 1078

SB 1078 (2002) established the RPS program, which requires an annual increase in renewable generation by the utilities equivalent to at least 1% of sales, with an aggregate goal of 20% by 2017. This goal was subsequently accelerated, requiring utilities to obtain 20% of their power from renewable sources by 2010.

Senate Bill 1368

SB 1368 (2006) required CEC to develop and adopt regulations for GHG emission performance standards for the long-term procurement of electricity by local publicly owned utilities. This effort helps protect energy customers from financial risks associated with investments in carbon-intensive generation by allowing new capital investments in power plants whose GHG emissions are as low as or lower than new combined-cycle natural gas plants by requiring imported electricity to meet GHG performance standards in California and by requiring that the standards be developed and adopted in a public process.

Senate Bill X1 2

SB X1 2 (2011) expanded the RPS by establishing that 20% of the total electricity sold to retail customers in California per year be secured from qualified renewable energy sources by December 31, 2013, and 33% by December 31, 2020, and in subsequent years. Under SB X1 2, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation of 30 megawatts or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current and that meets other specified requirements with respect to its location. In addition to the retail sellers previously covered by the RPS, SB X1 2 added local, publicly owned electric utilities to the RPS.

Senate Bill 350

SB 350 (2015) further expanded the RPS by establishing that 50% of the total electricity sold to retail customers in California per year by December 31, 2030, be secured from qualified renewable energy sources. In addition, SB 350 included the goal of doubling the energy efficiency savings in electricity and natural gas final end uses (such as heating, cooling, lighting, or classes of energy uses on which

an energy efficiency program is focused) of retail customers through energy conservation and efficiency. The bill also required the California Public Utilities Commission, in consultation with the CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal.

Senate Bill 100

SB 100 (2018) increased the standards set forth in SB 350, which established that 44% of the total electricity sold to retail customers in California per year be secured from qualified renewable energy sources by December 31, 2024; 52% by December 31, 2027; and 60% by December 31, 2030. Under SB 100, it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California. This bill requires that achievement of 100% zero-carbon electricity resources not increase the carbon emissions elsewhere in the western grid and that achievement of this goal not occur through resource shuffling.

Executive Order S-1-07

EO S-1-07 (January 2007, implementing regulation adopted in April 2009) sets a declining Low Carbon Fuel Standard for GHG emissions measured in CO_2e grams per unit of fuel energy sold in California. The target of the Low Carbon Fuel Standard was to reduce the carbon intensity of California passenger vehicle fuels by at least 10% by 2020 (17 CCR 95480 et seq.). The carbon intensity measures the amount of GHG emissions in the lifecycle of a fuel—including extraction/ feedstock production, processing, transportation, and final consumption—per unit of energy delivered.

Senate Bill 375

SB 375 (2008) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. SB 375 required CARB to adopt regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035. Regional metropolitan planning organizations were then responsible for preparing a sustainable communities strategy (SCS) within their regional transportation plan (RTP). The goal of the SCS is to establish a forecasted development pattern for the region that, after considering transportation measures and policies, would achieve, if feasible, the GHG reduction targets. If an SCS is unable to achieve the GHG reduction target, a metropolitan planning organization must prepare an alternative planning strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

Pursuant to Government Code, Section 65080(b)(2)(K), an SCS does not (1) regulate the use of land; (2) supersede the land use authority of cities and counties; or (3) require that a city's or county's land use policies and regulations, including those in a general plan, be consistent with it. Nonetheless, SB 375 makes regional and local planning agencies responsible for developing those strategies as

part of the federally required metropolitan transportation planning process and the state-mandated housing element process.

The passage of SB 375 requires metropolitan planning organizations to prepare an SCS in their RTP. The San Diego Association of Governments (SANDAG) serves as the metropolitan planning organization for the San Diego region and is responsible for developing and adopting an SCS that integrates transportation, land use, and housing to meet GHG reduction targets set by CARB. The RTP/SCS is updated every 4 years in collaboration with the 18 cities and unincorporated County of San Diego, in addition to regional, state, and federal partners. The most recent RPT/SCS was adopted in 2021 and provides guidance on meeting or exceeding GHG targets through implementation of five key transportation strategies: complete corridors, high-speed transit services, mobility hubs, flexible fleets, and a digital platform to tie the transportation system together. Through these strategies, the RTP/SCS is projected to reduce per-capita GHG emissions from cars and light-duty trucks to 20% below 2005 levels by 2035, exceeding the region's state-mandated target of 19% (SANDAG 2021).

Advanced Clean Cars Program

In January 2012, CARB approved the Advanced Clean Cars program, a new emissions control program for model years 2015 through 2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package. The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars (CARB 2011b). To improve air quality, CARB has implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. It is estimated that in 2025, cars will emit 75% less smog-forming pollution than the average new car sold before 2012. To reduce GHG emissions, CARB, in conjunction with EPA and NHTSA, has adopted new GHG standards for model year 2017 to 2025 vehicles that are estimated to reduce GHG emissions by 34% in 2025. The ZEV program will act as the focused technology of the Advanced Clean Cars program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid electric vehicles (EVs) in the 2018 to 2025 model years.

Executive Order B-16-12

EO B-16-12 (2012) directs state entities under the governor's direction and control to support and facilitate development and distribution of ZEVs. This EO also sets a long-term target of reaching 1.5 million ZEVs on California's roadways by 2025. On a statewide basis, EO B-16-12 also establishes a GHG emissions reduction target from the transportation sector equaling 80% less than 1990 levels by 2050. In furtherance of this EO, the governor convened an interagency working group on ZEVs that has published multiple reports regarding the progress made on the penetration of ZEVs in the statewide vehicle fleet.

Assembly Bill 1236

AB 1236 (2015) requires local land use jurisdictions to approve applications for the installation of EV charging stations, as defined, through the issuance of specified permits, unless there is substantial evidence in the record that the proposed installation would have a specific adverse impact on public health or safety and there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact. The bill provides for appeal of that decision to the planning commission, as specified. AB 1236 requires local land use jurisdictions with a population of 200,000 or more residents to adopt an ordinance, by September 30, 2016, that creates an expedited and streamlined permitting process for EV charging stations, as specified. The City added Section 86.0151, Electric Vehicle Parking Regulations, to the San Diego Municipal Code in August 2015 in response to the AB 1236 requirements.

Senate Bill 350

In 2015, SB 350—the Clean Energy and Pollution Reduction Act—was enacted into law. As one of its elements, SB 350 established a statewide policy for widespread electrification of the transportation sector, recognizing that such electrification is required for achievement of the state's 2030 and 2050 reduction targets (see California Public Utilities Code, Section 740.12).

Executive Order B-48-18

EO B-48-18 (2018) launched an 8-year initiative to accelerate the sale of EVs through a mix of rebate programs and infrastructure improvements. The order also set a new EV target of 5 million EVs in California by 2030. EO B-48-18 included funding for multiple state agencies, including CEC, to increase EV charging infrastructure and for CARB to provide rebates for the purchase of new EVs and purchase incentives for low-income customers.

Assembly Bill 939 and Assembly Bill 341, Assembly Bill 1826, and Senate Bill 1383

In 1989, AB 939, known as the Integrated Waste Management Act (California Public Resources Code, Section 40000 et seq.), was passed because of the increase in waste stream and the decrease in landfill capacity. The statute established the California Integrated Waste Management Board (replaced in 2010 by the California Department of Resources Recycling and Recovery), which oversees a disposal reporting system. AB 939 mandated a reduction of waste being disposed of where jurisdictions were required to meet diversion goals of all solid waste through source reduction, recycling, and composting activities of 25% by 1995 and 50% by 2000.

AB 341 (2011) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75% of solid waste

generated be source-reduced, recycled, or composted by 2020, and annually thereafter. In addition, AB 341 required the California Department of Resources Recycling and Recovery to develop strategies to achieve the state's policy goal.

AB 1826 (effective 2016) requires businesses to recycle their organic waste (i.e., food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste) depending on the amount of waste they generate per week. This law also requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units. The minimum threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to comply.

SB 1383 (2016) requires a 50% reduction in organic waste disposal from 2014 levels by 2020 and a 75% reduction by 2025—essentially requiring the diversion of up to 27 million tons of organic waste—to reduce GHG emissions. SB 1383 also requires that not less than 20% of edible food that is currently disposed of be recovered for human consumption by 2025.

Executive Order B-29-15

In response to the ongoing drought in California, EO B-29-15 (April 2015) set a goal of achieving a statewide reduction in potable urban water usage of 25% relative to water use in 2013. The term of the EO extended through February 28, 2016, although many of the directives have since become permanent water-efficiency standards and requirements. EO B-29-15 includes specific directives that set strict limits on water usage in the state. In response to EO B-29-15, the California Department of Water Resources has modified and adopted a revised version of the Model Water Efficient Landscape Ordinance, that, among other changes, significantly increases the requirements for landscape water use efficiency and broadens its applicability to include new development projects with smaller landscape areas.

Senate Bill 97

SB 97 (August 2007) directed the Governor's Office of Planning and Research to develop guidelines under CEQA for the mitigation of GHG emissions. In 2008, the Office of Planning and Research issued a technical advisory as interim guidance regarding the analysis of GHG emissions in CEQA documents. The advisory indicated that the lead agency should identify and estimate a project's GHG emissions, including those associated with vehicular traffic, energy consumption, water usage, and construction activities (OPR 2008). The advisory further recommended that the lead agency determine significance of the impacts and impose all mitigation measures necessary to reduce GHG emissions to a level that is less than significant. The California Natural Resources Agency adopted

the CEQA Guidelines amendments related to GHG in December 2009, which became effective in March 2010.

Under the amended CEQA Guidelines, a lead agency has the discretion to determine whether to use a quantitative or qualitative analysis or apply performance standards to determine the significance of GHG emissions resulting from a particular project (14 CCR 15064.4[a]). The CEQA Guidelines require a lead agency to consider the extent to which a project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4[b]). The CEQA Guidelines also allow a lead agency to consider feasible means of mitigating the significant effects of GHG emissions, including reductions in emissions through the implementation of project features or off-site measures. The adopted amendments do not establish a GHG emission threshold, instead allowing a lead agency to develop, adopt, and apply its own thresholds of significance or those developed by other agencies or experts. The California Natural Resources Agency also acknowledges that a lead agency may consider compliance with regulations or requirements implementing AB 32 in determining the significance of a project's GHG emissions (CNRA 2009a).

With respect to GHG emissions, CEQA Guidelines Section 15064.4(a) states that lead agencies should "make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. The CEQA Guidelines note that an agency may identify emissions by either selecting a "model or methodology" to quantify the emissions or by relying on "qualitative analysis or other performance-based standards" (14 CCR 15064.4[a]). Section 15064.4(b) states that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment: (1) the extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting; (2) whether project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which a project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4[b]).

Executive Order S-13-08

EO S-13-08 (November 2008) is intended to hasten California's response to the impacts of global climate change, particularly sea-level rise. Therefore, EO S-13-08 directs state agencies to take specified actions to assess and plan for such impacts. The final 2009 California Climate Adaptation Strategy report was issued in December 2009 (CNRA 2009b), and an update, Safeguarding California: Reducing Climate Risk, followed in July 2014 (CNRA 2014). To assess the state's vulnerability, the report summarizes key climate change impacts to the state for the following areas: agriculture, biodiversity and habitat, emergency management, energy, forestry, ocean and coastal ecosystems and resources, public health, transportation, and water. Issuance of the Safeguarding California:

Implementation Action Plans followed in March 2016 (CNRA 2016). In January 2018, the California Natural Resources Agency released the Safeguarding California Plan: 2018 Update, which communicates current and needed actions that state government should take to build climate change resiliency (CNRA 2018).

Local

City of San Diego General Plan

The State of California requires cities and counties to prepare and adopt a general plan to set out a long-range vision and comprehensive policy framework for its future. The state also mandates that the plan be updated periodically to ensure relevance and utility. The City's General Plan 2008 (General Plan) was unanimously adopted by the City Council on March 10, 2008. The General Plan builds on many of the goals and strategies of the former 1979 General Plan, in addition to offering new policy direction in the areas of urban form, neighborhood character, historic preservation, public facilities, recreation, conservation, mobility, housing affordability, economic prosperity, and equitable development. It recognizes and explains the critical role of the community planning project as the vehicle to tailor the City of Villages strategy for each neighborhood. It also outlines the plan amendment process, and other implementation strategies, and considers the continued growth of the City beyond the year 2020 (City of San Diego 2008).

Conservation Element

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 on for continued economic prosperity. The purpose of this element is to help the City become an international model of sustainable development and conservation and to provide for the long-term conservation and sustainable management of the rich natural resources that help define the City's identity, contribute to its economy, and improve its quality of life.

The City has adopted the following General Plan policies (City of San Diego 2008) related to climate change (refer to Section 5.1, Land Use, for a consistency analysis for policies applicable to the project):

- **CE-A.2.** Reduce the City's carbon footprint. Develop and adopt new or amended regulations, projects, and incentives as appropriate to implement the goals and policies set forth in the General Plan to:
    - Reduce fuel emission levels by encouraging alternative modes of transportation and increasing fuel efficiency;

  - Reduce the Urban Heat Island effect through sustainable design and building practices, as well as planting trees (consistent with habitat and water conservation policies) for their many environmental benefits, including natural carbon sequestration;
  - Reduce waste by improving management and recycling projects;
- **CE-I.4.** Maintain and promote water conservation and waste diversion projects to conserve energy.
- **CE-I.5.** Support the installation of photovoltaic panels, and other forms of renewable energy production.
- **CE-I.10.** Use renewable energy sources to generate energy to the extent feasible.

City of San Diego Climate Action Plan

The City adopted a climate action plan (CAP) in 2015 and updated it in 2022. The 2022 CAP establishes a communitywide goal of net zero GHG emissions by 2035, committing the City to an accelerated trajectory for GHG reductions. The CAP outlines strategies and measures to reduce the City's contribution to GHG emissions and align with statewide emission targets (i.e., those outlined for 2030 in SB 32). The CAP includes six strategies to facilitate GHG emission reduction from activities within the City. The measures address GHG emissions from the built environment, energy use, and transportation, among others (City of San Diego 2022a).

The 2022 CAP sets the target emission level for 2035 at net zero emissions (i.e., cutting GHG emissions to as close to zero as possible, with any remaining emissions balanced by removals) and sets a science-based, fair share target for 2030 (63.3% below 1990 levels), which is far stricter than the SB 32 target of 40% below 1990 levels by 2030.

As part of the 2022 CAP, the CAP Consistency Checklist was repealed and replaced by Ordinance O-21528. This ordinance provides amendments to the San Diego Municipal Code to ensure that new development is consistent with the updated CAP (CAP Consistency Regulations), as applicable, and will collectively achieve the specified GHG emission reduction targets of the CAP update. While the project was deemed complete on April 20, 2021, prior to the adoption of the 2022 CAP and the effective date (October 23, 2022) of the CAP Consistency Regulations, the project is complying with the CAP Consistency Regulations and the 2022 CAP. The CAP update serves as a Qualified GHG Reduction Plan for purposes of tiering under CEQA as set forth in CEQA Guidelines Section 15183.5.

CAP Consistency Checklist

The CAP Consistency Checklist is intended to provide a streamlined review process for the GHG emissions analysis of proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA. The CAP Consistency Checklist is part of 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 these measures would ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving the identified GHG emissions reduction targets. Projects that are consistent with the CAP as determined through the use of this checklist may rely on the CAP for the cumulative impacts analysis of GHG emissions. Projects that are not consistent with the CAP must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in this checklist to the extent feasible. Cumulative GHG impacts would be significant for any project that is not consistent with the CAP. As described above, the CAP Consistency Checklist was repealed and replaced by Ordinance O-21528, the CAP Consistency Regulations.

CAP Implementation Plan

The City published the draft Climate Action Implementation Plan (Implementation Plan) on February 28, 2023. The Implementation Plan organizes the City's processes and government structure around the net zero goal—centering equity, accountability, and transparency. The Implementation Plan includes cost estimates to align the City's future budgeting decisions with the CAP. Furthermore, the Implementation Plan lays out the tasks and responsibilities to be carried forward by departments and reported on through annual workplans. This will be a tool to define each City department's CAP implementation work for each fiscal year and further integrate equity into climate action related projects and initiatives. The Implementation Plan is a citywide measure and is not directly applicable to the project.

5.7.3 IMPACTS ANALYSIS

5.7.3.1 Issues 1 and 2: Generation and Reduction of Greenhouse Gas Emissions

Issue 1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Issue 2: Would the project conflict with the City's Climate Action Plan or another applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Thresholds

Pursuant to CEQA Guidelines Sections 15183.5(b), 15064(h)(3), and 15130(d), the City may determine that a project's incremental contribution to a cumulative GHG effect is not cumulatively considerable if the project complies with the requirements of a previously adopted GHG emission reduction plan. As discussed above, the City adopted a CAP in 2015, with an amendment in 2016 to include the CAP Checklist, and subsequently an amendment in 2022 to update the CAP and replace the CAP

Consistency Checklist with the CAP Consistency Regulations. The City's CAP and CAP update serve as a Qualified GHG Reduction Plan for purposes of tiering under CEQA and CEQA Guidelines Section 15183.5.

According to the City's Significance Determination Thresholds (City of San Diego 2022b), and as discussed in Section 2.2.3.2, the project would have a significant impact on GHG emissions if the project were:

- Inconsistent with the City's CAP, as determined through the CAP Consistency Regulations.

Projects that are not consistent with the CAP must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in the CAP Consistency Regulations to the extent feasible. Cumulative GHG impacts would be significant for any project that is not consistent with the CAP.

For project-level environmental documents, significance is determined through land use consistency and project compliance with the regulations set forth in San Diego Municipal Code Chapter 14, Article 3, Division 14 (CAP Consistency Regulations). The CAP Consistency Regulations establish measures that could be implemented on a project-by-project basis to demonstrate consistency with the 2022 CAP pursuant to CEQA Guidelines Section 15183.5(b)(1)(D). Section 10 of the CAP Consistency Regulations states it does not apply to projects deemed complete prior to the date on which the applicable provision of this ordinance became effective, which was October 23, 2022. The project was deemed complete April 20, 2021, prior to the effective date of the CAP Consistency Regulations. The project is opting into the City's CAP Consistency Regulations and therefore the analysis of the project's consistency with the CAP Consistency Regulations is contained herein. If a project is not consistent with the General Plan land use and zoning and not in a Transit Priority Area, it may exceed the emissions that were included in the inventory used to develop the CAP. In that case, the analysis must assess whether the proposed development is equivalent to or less GHG intensive than existing designations. If a project is more GHG intensive, then the project cumulative GHG impact would be significant and a project-specific analysis of GHG emissions must be prepared, including quantification of existing and projected GHG emissions.

Impact Analysis

Land Use Consistency

The site is designated as Park, Open Space, and Recreation and Residential per the City's General Plan. The Scripps Miramar Ranch Community Plan land use designation for the project site is Very Low Residential (3-5 dwelling units per net acre) and Open Space (Scripps Miramar Ranch Planning Committee et al. 2018). The Community Plan, Figure 7b "Area "E" Unit Allocation by Owner" identifies

a maximum of 45 units on the project site. The project site is currently zoned as Agricultural-Residential. Under the permitted uses within the Agricultural-Residential zone, the site buildout forecast would be agricultural uses or low-density single dwelling unit homes with a minimum of 10 acre lots. Overall, considering both land use and zoning, the maximum allowed site buildout under the existing conditions would be four single-family units.

The project includes a Community Plan Amendment and a Rezone. Specifically, the project would redesignate the site to Low Residential, and rezone to Residential–Small Lot (RX)-1-2, Residential–Multiple Unit (RM)-2-4, and Open Space–Residential (OR)-1-2. The proposed Community Plan Amendment to 2.8 du/ac would allow for up to 112 units. The proposed RX zone provides both attached and detached single dwelling units on smaller lots than required in the Residential–Single Unit (RS) zones. RX-1-2 would require a minimum of 3,000-square-foot lots. The RM zone provides for multiple dwelling unit development at varying densities. The proposed RM-2-4 permits a maximum density of one dwelling unit for each 1,750 square feet of lot area (SDMC Table 131-04B). The proposed project would be capped at 112 units per the Community Plan Amendment. Overall, the proposed land use changes would increase the allowed site buildout from four single-family units to 112 units.

SANDAG's growth forecast assumed half the site would be open space, a quarter of the site would be spaced rural residential, and the remaining quarter would be single-family residential, which the project would not be consistent with. The project would allow for more development than anticipated in the SANDAG Series 14 growth projections and would not be consistent with those growth assumptions.

In conclusion, because the project would not be consistent with the existing land use and zoning designations or SANDAG growth assumptions, and emissions would be greater than assumed in the CAP, Step 1, Land Use Consistency, is marked as "No," and the project would result in a more GHG-intensive use when compared to the existing designations. The proposed project is not located within a Transit Priority Area (City of San Diego 2019), and would be increasing growth in non-GHG efficient areas in conflict with the CAP. As such, the project would be inconsistent with the CAP and a quantified GHG emissions analysis is required per the Significance Determination Thresholds (City of San Diego 2022).

GHG Emissions

Construction

Table 5.7-1 provides estimated GHG emissions from the proposed project construction. Conservatively, no construction is assumed under the existing conditions even though up to four single-family units could be constructed with the existing land use designation and zoning. Detailed calculations are provided in Appendix F. As shown in Table 5.7-1, t the proposed project is estimated

to result in a total construction GHG emissions of 2,366.5 MT CO_2e, equivalent to 78.88 MT/year CO_2e amortized over a 30-year period.

Table 5.7-1
Estimated Project Construction Greenhouse Gas Emissions

Emission Source	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons per Year				
2024	147	0.01	<0.01	0.03	148
2025	881	0.04	0.02	0.11	888
2026	488	0.02	0.02	0.21	494
2027	448	0.02	0.02	0.20	453
2028	360	0.01	0.01	0.13	364
2029	19.3	<0.01	<0.01	0.02	19.5
				Total	**2,366.50**
				30-Year Amortized (Project) Emissions	*78.88*

Source: Appendix F.
Note: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R = refrigerant; CO_2e = carbon dioxide equivalent.

Operation

Table 5.7-2 provides estimated GHG emissions f of the project. Conservatively, no operational emissions are assumed under the existing conditions even though up to four single-family units could be constructed with the existing land use designation and zoning. Detailed calculations are provided in Appendix F.

Table 5.7-2
Estimated Project Operational Greenhouse Gas Emissions without Mitigation

Emission Source	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons per Year				
Area	49.6	<0.01	<0.01	0.25	49.95
Energy (natural gas and electricity)	173	0.02	<0.01	N/A	174
Mobile	1,201	0.05	0.05	1.48	1,219
Solid waste	6.68	0.67	0.00	N/A	23.4
Water supply and wastewater	4.12	0.13	0.01	N/A	8.35
Proposed Land Use (Project) Operational Emissions					*1,474.70*
30-Year Amortized Emissions					*78.88*
Total Proposed Land Use Emissions					**1,553.58**

Note: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R = refrigerant; CO_2e = carbon dioxide equivalent; N/A = not applicable.
Source: Appendix F

As shown in Table 5.7-2, annual emissions from buildout of the project (amortized construction emissions plus operational emissions) would be approximately 1,554 MT CO_2e per year. The project would be substantially more GHG-intensive than the existing designations.

Climate Action Plan Consistency Regulations

The purpose of the CAP Consistency Regulations is to implement the City's 2022 CAP update by applying regulations that reduce GHGs from development specified therein. Table 5.7-3 shows the project's consistency with the CAP Consistency Regulations.

Table 5.7-3
CAP Consistency Regulations

Section	Compliance
Section 143.1410 – Mobility and Land Use Regulations	
The following regulations support alternative mobility options, such as walking and biking, that reduce vehicle dependency and associated GHGs emissions. (a) Pedestrian enhancements that reduce heat island effects shall be provided as follows:	Section (a)(1): Consistent. The project would include 100 residential single-family lots and a lot containing 12 multifamily units. The project lots abut public right-of-way (interior public roads) and contain Furnishing Zones. Therefore, the project would comply with Section (a)(1)(A) and provide street trees. Per Section (a)(1)(C), shade trees coverage would be determined by the expected canopy at 10-year

Table 5.7-3
CAP Consistency Regulations

Section	Compliance
(1) Development on a premises that contains a street yard or abuts a public right-of-way with a Furnishings Zone, at least 50 percent of the Throughway Zone shall be shaded as specified below. (A) If the abutting public right-of-way contains a Furnishings Zone, shading shall be provided by street trees. (B) If the abutting public right-of-way does not contain a Furnishings Zone, shading may be provided by a combination of trees and shade structures placed in the street yard. (C) The shade coverage of a tree shall be determined by the expected canopy at 10-year maturity. The tree shall be selected in accordance with the Landscape Standards of the Land Development Manual and the City's Street Tree Selection Guide. (D) Trees shall be irrigated and maintained consistent with Section 142.0403. (E) The number of street trees provided shall not be less than what is required by the Landscape Regulations in Chapter 14, Article 2, Division 4. (2) Development on a premises that does not contain a street yard and does not about a public right-of-way with a Furnishings Zone, the applicant shall do one of the following: (A) Plant the number of trees required by Section 143.1410(a)(1) at an off-site location within one	maturity and be selected in accordance with the Land Development Manual and the City's Street Tree Selection Guide. Trees would be irrigated, and the number would meet the requirements of Landscape Regulations in Chapter 14, Article 2, Division 4. Section (a)(2): Not Applicable. The project would have a street yard and be subject to Section (a)(1). Section (b): Not Applicable. The project's 100 residential single-family lots and the multifamily residential complex would each have less than 250 linear feet of street frontage zones. Section (c): Consistent. Chapter 14, Article 2, Division 5 regulations require bicycle parking for multifamily residential units. The project would include 12 three-bedroom multifamily, affordable housing units and, per Footnote 5 of Table 142.0525 of Chapter 14, Article 2, Division 5 regulations, bicycle racks are not required for a dwelling unit with a garage accessible only by the residents of the dwelling unit. The project would provide 24 garage spaces for the multifamily units; as such, bicycle parking would not be required. Nevertheless, the project includes 0.6 bicycle parking spaces per each 3- to 4-bedroom dwelling unit of the multifamily unit, for a total of 8 bicycle parking spaces. A total of 50%of the 8 bicycle parking spaces (4 spaces) would include outlets for electric charging.

Table 5.7-3
CAP Consistency Regulations

Section	Compliance
mile of the development and enter into an agreement with the owner of the off-site location that ensures the indefinite maintenance of the trees; or (B) Pay an Urban Tree Canopy Fee to be deposited into the Climate Resiliency Fund consistent with adopted City Council Resolution. (b) Development on a premises with 250 linear feet or more of street frontage shall provide and privately maintain at least one of the following publicly accessible pedestrian amenities for every 250 linear feet of street frontage to the satisfaction of the Development Services Department: (1) One trash receptacle and one recycling container; (2) Seating comprised of movable seats, fixed individual seats, benches with or without backs, or design feature seating, such as seat walls, ledges, or seating steps; (3) Pedestrian-scale lighting that illuminates the adjacent sidewalk; (4) Public artwork; (5) Community wayfinding signs; or (6) Enhancement of a bus stop or public transit waiting station within 1,000 feet of the premises. (c) At least 50 percent of all residential and non-residential bicycle parking spaces required in accordance with Chapter 14, Article 2, Division 5 shall be supplied with individual outlets for electric charging at each bicycle parking space.	
Section 143.1415 – Resilient Infrastructure and Healthy Ecosystems Regulations	
The following regulations support carbon sequestration as well as enhancement of air quality and the urban tree canopy.	Section (a): Consistent. Based on a total lot area of 536,168 sf, which includes the single-family and multifamily unit lots, the project would

Table 5.7-3
CAP Consistency Regulations

Section	Compliance
(a) Two trees shall be provided on the premises for every 5,000 square feet of lot area, with a minimum of one tree per premises. (1) If planting of a new tree is required to comply with this Section, the tree shall be selected in accordance with the Landscape Standards of the Land Development Manual and the City's Street Tree Selection Guide. (2) Where possible, trees must be planted in native soil. Where native soil planting is prohibited by site conditions, required trees may be provided in built-in or permanently affixed planters and pots on structural podiums. Planters and pots for trees shall have a minimum inside dimension of 48 inches. (3) For a premises located within a base zone that does not require open space to accommodate the planting of on-site trees in compliance with this Section, the applicant shall do one of the following, except that all trees required by the Landscape Regulations in Chapter 14, Article 2, Division 4 must be provided on-site: (A) Plant the number of trees required by Section 143.1415(a) at an off-site location within one mile of the development and enter into an agreement with the owner of the off-site location that ensures the indefinite maintenance of the trees; or (B) Pay an Urban Tree Canopy Fee to be deposited into the Climate Resiliency Fund consistent with adopted City Council Resolution.	include at least 215 trees (536,168 sf at 2 trees per 5,000 sf), with at least one tree on each lot. Section (a)(1): Consistent. New trees planted would comply with the Landscape Standards of the Land Development Manual and the City's Street Tree Selection Guide. Section (a)(2): Consistent. Where possible, trees would be planted in native soils. When native soil planting is prohibited by site conditions, trees would be provided in planters and pots on structural podiums with an inside dimension of 48 inches. Section (a)(3): Not Applicable. On-site tree requirement would be met on site. Section (a)(4): Consistent. Trees shall be irrigated and maintained consistent with Section 142.0403. Section (a)(5): Consistent. The number of trees shall not be less than the requirements of the Landscape Regulations in Chapter 14, Article 2, Division 4.

Table 5.7-3
CAP Consistency Regulations

Section	Compliance
(4) Trees shall be irrigated and maintained consistent with Section 142.0403. (5) The number of trees provided shall not be less than what is required by the Landscape Regulations in Chapter 14, Article 2, Division 4.	

Notes: CAP = Climate Action Plan; GHG = greenhouse gas; sf = square feet.

As shown in Table 5.7-3, the project would be consistent with the CAP Consistency Regulations.

Consistency with Climate Action Plan Strategies

Because the project involves a plan-level change (Community Plan Amendment), a consistency analysis is required to address project consistency with the CAP strategies in accordance with the City's Memorandum titled Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects dated June 17, 2022, prepared by the Planning Department (City of San Diego 2022c). The following provides a consistency analysis for each of the six CAP strategies.

Strategy 1: Decarbonization of the Built Environment

Strategy 1 of the City's CAP recognizes the large emission reduction potential from reducing the use of energy generated from fossil fuels and the use of natural gas in buildings. The proposed project would involve construction and operation of new buildings and includes a Project Design Feature (PDF), PDF-AQ-2, to prohibit the use natural gas. As such, it would not conflict with the City's strategies to reduce emissions from building energy.

Strategy 2: Access to Clean & Renewable Energy

Strategy 2 of the City's CAP includes a goal of 100% renewable or GHG-free power for the City by 2030. To achieve this goal, the City plans to partner with San Diego Community Power to increase adoption of 100% renewable energy supply and to incentivize local generation of renewable energy resources, increase municipal ZEVs, and expand EV charging to encourage Citywide adoption of electric vehicles and bicycles. The proposed project would include on-site solar photovoltaic and an EV parking space (Figure 3-1, Site Plan). The proposed project would not conflict with the City's ability to implement and achieve their renewable energy goals.

Strategy 3: Mobility & Land Use

The City's CAP Strategy 3 addresses mobile source emissions and land use patterns throughout the City. The strategy promotes bike and pedestrian projects to encourage alternative modes of transit, as well as actions to reduce traffic and congestion across the City. As discussed in Section 5.2, Transportation, the project proposes several multi-use trails within the project site and includes pedestrian improvements to connect to existing sidewalks. In addition, the project would construct the connection of Cypress Canyon Road between Angelique Street and Cypress Canyon Park Drive, which would provide bicycle connectivity consistent with the proposed Class III Bike Route outlined in the Community Plan. Based on the above project characteristics, the project would not conflict with the City's strategy to encourage alternative transportation in the form of walking and bicycling.

Strategy 4: Circular Economy & Clean Communities

Strategy 4 of the City's CAP addresses waste and clean communities. To achieve their waste-related goals, the City proposes actions to change the waste stream; reduce municipal waste; encourage food waste prevention and food recovery; update, adopt, and implement the Zero Waste Plan; and capture methane from wastewater treatment facilities. The project includes a construction waste reduction program (Appendix M3) that requires 100% recycling of demolition waste and 75% diversion of construction waste and implementation of a residential recycling program, including recyclable material storage areas, provision of recycling materials receptacles, provision of organic waste recycling receptacles, collection of recyclables twice a month, and education to residents about recycling services. With the implementation of the above sustainability features as PDF-UTIL-1, the project would not impede the achievement of the City's goals and would be consistent with the City's strategy.

Strategy 5: Resilient Infrastructure and Healthy Ecosystems

The City's CAP includes actions related to the natural and built environments to reflect the City's resiliency work to prepare for the impacts of climate change and minimize its negative effects. The project would include the planting of trees in accordance with the City's CAP regulations, as detailed in Table 5.7-3 above and shown in Figures 3.3a through 3.3c, Proposed Landscape Plan. The project would also reduce potable water use using low-flow fixtures and includes the use of recycled water for outdoor water use (PDF-UTIL-2). These project features would support the City's goals related to resilient infrastructure and healthy ecosystems.

Strategy 6: Emerging Climate Action

Strategy 6 of the City's CAP addresses emerging actions to reach emission reduction goals. Emerging actions include new policies, technological innovation, partnerships, and research that advances the

City's net zero goal. While the proposed project does not explicitly propose emerging climate action strategies, as the vehicle fleet of residents are replaced over time with more fuel-efficient vehicles and ZEVs, mobile GHG emissions associated with the project would decrease into the future. As such, implementation of the project would not conflict with the City's achievement of this strategy.

Based on the preceding discussion, the project would be consistent with CAP strategies.

General Plan Policies

The City General Plan includes policies to reduce GHG emissions. The project's consistency with General Plan policies is evaluated in Table 5.7-4.

Table 5.7-4
Consistency with General Plan Policies

Policy	Consistency Determination
LU-A.7 Establish a mix of uses within village areas, or individual projects within village areas, to promote walking/rolling, biking, and transit usage and support progress towards climate goals and greenhouse gas emission reductions.	**Consistent.** Although the project would require a Community Plan Amendment and Rezone, it would serve to develop an underutilized area with more dense development to include needed housing to meet the regional housing needs. In addition, the project would include trail connections and pedestrian and bicycle improvements to promote walking and bicycling and support the City's climate goals.
CE-J.2 Include community street tree master plans in community plans. a. Prioritize community streets for street tree programs. b. Identify the types of trees proposed for those priority streets by species (with acceptable alternatives) or by design form. c. Integrate known protected trees and inventory other trees that may be eligible to be designated as a protected tree.	**Consistent.** The project includes landscaping and brush management consistent with the City's regulations. The project would include a landscape plan with drought-tolerant native vegetation and low water use plants.
CE-J.3 Develop community plan street tree master plans during community plan updates in an effort to create a comprehensive citywide urban forest master plan (see Conservation Element Policy CE-J.1).	**Consistent.** The project would include a landscaping plan consistent with the City's regulations.
ME-D.17 (formerly ME-B.9) Make transit planning an integral component of long-range planning documents and the development review process.	**Not Applicable.** This is a citywide measure implemented by the City; however, the project would not impede the City's efforts in transit planning.

Table 5.7-4
Consistency with General Plan Policies

Policy	Consistency Determination
a. Continue to coordinate with SANDAG and transit operators to identify corridors and intersections for dedicated transit lanes and transit signal priority treatments and identify recommended transit routes and stops/stations as a part of the preparation of community plans and community plan amendments, and through the development review process. b. Plan for transit-supportive villages, transit corridors, and other higher-intensity uses in areas that are served by existing or planned higher-quality transit services, in accordance with the Land Use and Community Planning Element. c. Proactively seek reservations or dedications of right-of-way along transit routes and stations through the planning and development review process. d. Proactively seek opportunities to repurpose rights-of-way and/or installation of interim or pilot improvement projects that support transit operations and can be quickly implemented. e. Locate new public facilities that generate large numbers of person trips, such as libraries, community service centers, and some recreational facilities in areas with existing or planned transit access. f. Design for walkability in accordance with the Urban Design Element, as pedestrian-supportive design also helps create a transit-supportive environment. g. Address rail corridor safety in the design of development adjacent to or near railroad rights-of-way. h. Improve transit resiliency and the ability of transit infrastructure to withstand the effects of climate change, while maintaining services.	

The project would not conflict with the applicable GHG-reducing goals or policies within the City's General Plan as identified in Section 5.7.2, Regulatory Framework. Therefore, the project would be consistent with the City's General Plan policies for reducing GHG emissions.

As detailed in Section 5.7.2, numerous plans, policies, and regulations have been adopted for the purpose of reducing GHG emissions. The principal overall state plan and policy are AB 32 and the follow-up legislation, SB 32. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020 and the goal of SB 32 is to reduce GHG emissions to 40% below 1990 levels by 2030. The City's CAP outlines the measures for the City to achieve its share of state GHG reductions. As discussed, the project would be consistent with the CAP Consistency Regulations, the CAP strategies, and General Plan policies; therefore, the project would be consistent with state GHG reduction goals.

Significance of Impact

Overall, the project would result in a potentially significant impact to GHGs considering the project would be more GHG-intensive than the uses assumed in the CAP for the project site.

Mitigation Measures

As shown above, the project would meet or exceed the requirements of the CAP Consistency Regulations. Nevertheless, to reduce the potential GHG emissions associated with the project to the extent feasible, the applicant shall implement the following mitigation measures (MMs):

MM-GHG-1: Prior to the issuance of building permits, the City of San Diego (City) shall verify that the building plans provide street trees. Per Climate Action Plan Consistency Regulation Section (a)(1)(C), shade tree coverage shall be determined by the expected canopy at 10-year maturity and shall be selected in accordance with the City's Land Development Manual and Street Tree Selection Guide. Trees shall be irrigated, and the number of trees shall meet the requirements of Landscape Regulations in Chapter 14, Article 2, Division 4 of the San Diego Municipal Code.

MM-GHG-2: Prior to the issuance of building permits, the City of San Diego shall verify that the building plans demonstrate the project includes 0.6 bicycle parking spaces per each 3- to 4-bedroom dwelling unit of the multifamily unit, for a total of 8 bicycle parking spaces. 50% of the 8 bicycle parking spaces (4 spaces) shall include outlets for electric charging.

MM-GHG-3: Prior to the issuance of a building permits, the City of San Diego (City) shall verify that the building plans demonstrate that the project includes at least 215 trees (536,168 square feet/5,000 square feet × 2 trees), with at least 1 tree on each lot and:

- New trees planted will comply with the Landscape Standards of the City's Land Development Manual and Street Tree Selection Guide.
- Where possible, trees shall be planted in native soils. When native soil planting is prohibited by site conditions, trees shall be provided in planters and pots on structural podiums with an inside dimension of 48 inches.
- Trees shall be irrigated and maintained consistent with Section 142.0403 of the San Diego Municipal Code (SDMC). The number of trees shall not be less than the requirements of the Landscape Regulations in Chapter 14, Article 2, Division 4 of the SDMC.

The project would include PDF-AQ-1 and PDF-AQ-2, which have been included in the project design from the conception of the project and are therefore not included as mitigation measures. Nevertheless, these project features would result in the reduction of potential project GHGs, since they would reduce emissions.

Significance After Mitigation

Table 5.7-5 provides estimated GHG emissions from the proposed project after the implementation of mitigation measures. Detailed calculations are provided in Appendix F.

Table 5.7-5
Estimated Project Operational Greenhouse Gas Emissions after Mitigation

Emission Source	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons per Year				
Area	48.24	<0.01	<0.01	0.25	48.54
Energy (natural gas and electricity)	13.51	0.01	<0.01	N/D	14.12
Mobile	1,198.0	0.06	0.05	1.48	1,215.5
Solid waste	6.68	0.67	0	N/D	23.38
Water supply and wastewater	4.12	0.13	<0.01	N/D	8.35
Proposed Land Use (Project) Operational Emissions					*1,309.9*
30-Year Amortized Emissions					*78.88*
Total Proposed Land Use Emissions					**1,388.78**

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R = refrigerant; CO_2e = carbon dioxide equivalent; N/D = no data.
Source: Appendix F

As shown in Table 5.7-5, annual emissions from buildout of the proposed land use, including quantifiable MMs, would be approximately 1,389 MT CO_2e per year, including amortized construction emissions. The quantifiable GHG MMs would not reduce the proposed project GHG emissions to the emission levels of four single-family residences. Project impacts related to GHGs would remain significant.

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5.8 HEALTH AND SAFETY

This section describes the existing health and safety conditions of the proposed Renzulli Estates Project (project) site, identifies associated regulatory requirements, and evaluates potential impacts related to the implementation of the project. The following discussion is based on the Community Health and Safety Plan, prepared by SCS Engineers (November 2020) and included as Appendix G1; Phase I Environmental Site Assessment (ESA), prepared by SCS Engineers (April 2019) and included as Appendix G2; Phase II ESA, prepared by SCS Engineers (January 2020) and included as Appendix G3; Soil Management Plan prepared by SCS Engineers (November 2020) and included as Appendix G4; Fire Fuel Load Modeling Report prepared by Dudek (May 2025) and included as Appendix L3; and Evacuation Plan prepared by Dudek (November 2023) included as Appendix N.

5.8.1 EXISTING CONDITIONS

Physical Conditions

Currently, the project site contains an existing single-family residence in the center of the site, one associated shed in the center of the project site, and a second shed north of the residence. Adjacent to the single-family residence to the east is a cleared, paved area. The majority of the project site remains undeveloped and includes native habitats, as discussed in Section 5.4, Biological Resources, of this environmental impact report (EIR). The Multi-Habitat Planning Area, the hardline preserve developed by the City of San Diego (City), covers most of the project site. The site also contains approximately 407,000 cubic yards[1] of undocumented fill soil and debris. The project site is surrounded by existing residential development to the north and west, small patches of undeveloped open space to the south, and Cypress Canyon Park to the east. The project site is not located within 0.25 miles of an existing school or proposed school.

Site History

Based on a review of publicly available aerial photographs performed as part of the Phase I ESA (Appendix G2), the existing single-family residence on site was first developed in the 1930s. The attached courtyard and northern maintenance garage were built circa 1985. The aerial photographs observed show that the additional maintenance garage was constructed on site circa 2005. According to the property owner, automobiles were repaired and detailed in Tom's Shop.

[1] The Community Health and Safety Plan (Appendix G1) reports that the project site contains 407,000 cubic yards of undocumented fill soils and debris. This reported number is greater than what is found in the Phase II Environmental Assessment (i.e., 300,000 cubic yards) (Appendix G3). This document acknowledges the discrepancy in both reports and shall use 407,000 cubic yards for a more conservative analysis.

Additionally, the two storage sheds were constructed on site around 2015. The storage sheds were used to store automotive parts, tools, and vehicles.

Hazardous Building Materials

Based on the age of the existing structures, there is a potential for asbestos-containing materials (ACM) and lead-based paint (LBP) to be present within the existing residential structures on the project site. LBP and ACM remediation is required as part of regulatory compliance. A hazardous materials building survey, including LBP and ACM testing, would be conducted in the existing residential structure. Identified materials would be removed and disposed of in accordance with applicable laws and regulations, including San Diego Air Pollution Control District Regulation XI, Subpart M; California Occupational Safety and Health Administration (Cal/OSHA) asbestos rules; California Department of Public Health lead laws and regulations; and California Environmental Protection Agency (CalEPA) disposal requirements.

Hazardous Materials

Government Code Section 65962.5 requires the California Department of Toxic Substances Control (DTSC), the State Department of Health Services, the State Water Resources Control Board (SWRCB), and the California Department of Resources Recycling and Recovery to compile and annually update lists of hazardous waste sites and lands designated as hazardous waste sites throughout the state. The provisions in Government Code Section 65962.5 are commonly referred to as the "Cortese List." The Cortese List was reviewed for hazardous waste sites along the project alignment. Resources included on the Cortese List include the following:

- List of hazardous waste and substances sites from the DTSC EnviroStor database
- List of open, active leaking underground storage tank sites from the SWRCB GeoTracker database
- List of solid waste disposal sites identified by SWRCB with waste constituents above hazardous waste levels outside the waste management unit
- List of active cease-and-desist orders and cleanup and abatement orders from SWRCB
- List of hazardous waste facilities subject to corrective action identified by DTSC

The above-listed databases and lists for information regarding hazardous materials or hazardous wastes were reviewed as part of the Phase I ESA (Appendix G2) to determine what, if any, potential contamination exists within the boundaries of the project site. The project site was identified on the Cortese List.

Environmental Databases

State and federal databases were also used in the Phase I ESA (Appendix G2) to obtain information pertaining to the project site and/or indications of recognized environmental conditions in connection with the project site or in the vicinity of the project site. These additional environmental databases and sources include CalEPA, DTSC EnviroStor database, the SWRCB GeoTracker database, and the National Pipeline Mapping System (hazardous material pipelines). The databases can be grouped into two general categories: databases reporting unauthorized releases of hazardous substances or petroleum products (e.g., Leaking Underground Storage Tanks, Resource Conservation and Recovery Act (RCRA) Corrective Action facilities, National Priorities List [also known as Superfund] sites) and databases reporting permitted hazardous materials users and hazardous waste generators, for which a release has not been reported to, and recorded by, the regulatory agency.

According to the Phase I ESA (Appendix G2), the project site was listed on the EnviroStor Database or the DTSC records as Scripps Ranch Middle School/Renzulli Site. The project site was listed within the Site Cleanup Program for construction of a proposed school and the potential for lead-impacted soil. The application for development was withdrawn in 2002. Three facilities in proximity to the project site were identified during the database search; however, none of these off-site facilities were identified as potential concerns for the project site.

An updated database search was conducted in August 2024 to confirm the listings identified on and within 1 mile of the project site. The project site, under the name Cyprus Canyon, was identified on the GeoTracker, or RWQCB database (SWRCB 2024), as a Cleanup Program Site—Case DEH2020—LSAM-000640 and T10000016581. This case indicates the site has potential contamination from petroleum hydrocarbons, metals, and pesticides related to undocumented fill. The Cleanup Program Site status is open for assessment and interim remedial action. The case is still open under the Department of Environmental Health and Quality (DEHQ) (DTSC 2024a, 2024b).

California Geologic Energy Management Division

The Phase I ESA (Appendix G2) documents the review of the California Division of Oil and Gas (now California Geologic Energy Management Division) Map regarding oil and gas well locations within 1 mile of the project site. No wells were interpreted to be located within a 1-mile radius of the project site. A revised review of the California Geologic Energy Management Division Well Finder database was conducted in May 2022; no new wells or other oil- and gas-related conditions were identified.

Emergency Response/Evacuation

The City is a participating jurisdiction in the County of San Diego (County) Multi-Jurisdictional Hazard Mitigation Plan (MHMP), a Countywide plan to identify risks and minimize damage from natural and human-made disasters (County of San Diego 2017). The primary goals of the MHMP include efforts to promote and provide compliance with applicable regulatory requirements (including through the promulgation/enhancement of local requirements), increase public awareness and understanding of hazard-related issues, and foster inter-jurisdictional coordination.

The San Diego Office of Homeland Security oversees the City's homeland security, disaster preparedness, emergency management, and recovery/mitigation programs. The primary focus of this effort is to ensure comprehensive emergency preparedness, training, response, recovery, and mitigation services for disaster-related effects. The Office of Homeland Security also maintains the City's Emergency Operations Center (EOC) and an alternate EOC in a ready-to-activate status, ensures that assigned staff are fully trained and capable of carrying out their responsibilities during activations, and manages the EOC during responses to multi-department and Citywide emergencies to support incident response activities and maintain Citywide response capabilities (City of San Diego 2017).

Additionally, the City is a participating agency in the County's Unified San Diego County Emergency Services Organization and Operational Area Emergency Operations Plan (EOP) (County of San Diego 2022, which addresses emergency issues including evacuation. Annex Q (Evacuation) of the EOP notes that "Primary evacuation routes consist of major interstates, highways and prime arterials within San Diego County" (County of San Diego2022). The closest primary evacuation route within the vicinity of the project site is Interstate 15, located approximately 2.5 miles west of the site. The nearest primary arterial that would serve as an evacuation route is Scripps Poway Parkway, located approximately 0.4 miles north of the site. Refer to Section 5.19, Wildfire, for further details on evacuation routes and travel times.

Airport Hazards

The closest airport to the project site is Marine Corps Air Station (MCAS) Miramar, located approximately 4 miles southwest of the project site. The airport land use compatibility plan for MCAS Miramar maps the project site as outside of the airport influence area (ALUC 2011).

5.8.2 REGULATORY FRAMEWORK

Federal

Comprehensive Environmental Response, Compensation, and Liability Act and Superfund Amendments and Reauthorization Act

Congress enacted the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, on December 11, 1980. CERCLA established prohibitions and requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. The Superfund Amendments and Reauthorization Act (SARA) amended CERCLA on October 17, 1986. SARA stressed the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites, required Superfund actions to consider the standards and requirements found in other state and federal environmental laws and regulations, provided new enforcement authorities and settlement tools, increased state involvement in every phase of the Superfund program, increased the focus on human health problems posed by hazardous waste sites, encouraged greater citizen participation in making decisions on how sites should be cleaned up, and increased the size of the trust fund to $8.5 billion.

Emergency Planning Community Right-to-Know Act

The Emergency Planning Community Right-to-Know Act, also known as SARA Title III, was enacted in October 1986. This law requires any infrastructure at the state and local levels to plan for chemical emergencies. Reported information is then made publicly available so that interested parties may become informed about potentially dangerous chemicals in their community. SARA Title III Sections 301 through 312 are administered by the U.S. Environmental Protection Agency (EPA) Office of Emergency Management. In California, SARA Title III is implemented through the California Accidental Release Prevention (CalARP) Program.

Federal Response Plan

The Federal Response Plan of 1999 is a signed agreement among 27 federal departments and agencies, including the American Red Cross, that (1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency; (2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act (Stafford Act), as well as individual agency statutory authorities; and (3) supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event

likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a presidential declaration of a major disaster or emergency.

Hazardous Materials Transportation Act

The U.S. Department of Transportation regulates hazardous materials transportation under Title 49 of the Code of Federal Regulations. The California Highway Patrol and the California Department of Transportation are the state agencies with primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies. These agencies also govern permitting for hazardous materials transportation. Title 49 of the Code of Federal Regulations reflects laws passed by Congress as of January 2, 2006.

International Fire Code

The International Fire Code (IFC), created by the International Code Council, is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The IFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The IFC and the International Building Code use a hazard classification system to determine what measures are required to protect fire and life safety. These measures may include construction standards, separation from project site lines, and specialized equipment. To ensure that these safety measures are met, the IFC employs a permit system based on hazard classification. The IFC is updated every 3 years.

National Emissions Standards for Hazardous Air Pollutants Program

Under federal law, 188 substances are listed as hazardous air pollutants. Major sources of specific hazardous air pollutants are subject to the requirements of EPA's National Emissions Standards for Hazardous Air Pollutants Program. EPA establishes regulatory schemes for specific source categories and requires implementation of maximum achievable control technologies for major sources of hazardous air pollutants in each source category.

Occupational Safety and Health Act

Congress passed the Occupational Safety and Health Act to ensure worker and workplace safety. Its goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. In order to establish standards for workplace health and safety, the Occupational Safety and Health Act also created the National Institute for Occupational Safety and Health as the research institution for the Occupational Safety

and Health Administration. The Occupational Safety and Health Administration is a division of the U.S. Department of Labor that oversees the administration of the Occupational Safety and Health Act and enforces standards in all 50 states. Because California has an approved state plan, only Cal/OSHA standards apply to the project site.

Renovating, Repair, and Painting Rule

In 2008, EPA issued the Renovation, Repair, and Painting Rule. This rule requires that firms performing renovation, repair, and painting projects that disturb LBP in pre-1978 homes, childcare facilities, and schools be certified by EPA and that they use certified renovators who are trained by EPA-approved training providers to follow lead-safe work practices. Individuals can become certified renovators by taking an 8-hour training course from an EPA-approved training provider. Contractors must use lead-safe work practices and follow these three procedures: (1) contain the work area, (2) minimize dust, and (3) clean up thoroughly.

Resource Conservation and Recovery Act

Federal hazardous waste laws are generally promulgated under the RCRA, as amended by the Hazardous and Solid Waste Amendments of 1984. These laws provide for the "cradle to grave" regulation of hazardous wastes. Any business, institution, or other entity that generates hazardous waste is required to identify and track its hazardous waste from the point of generation until it is recycled, reused, or disposed of. DTSC is responsible for implementing the RCRA program, as well as California's own hazardous waste laws, which are collectively known as the Hazardous Waste Control Law. Under the Certified Unified Program Agency program, the CalEPA has in turn delegated enforcement authority to DEHQ for regulating hazardous waste producers or generators.

Robert T. Stafford Disaster Relief and Emergency Assistance Act

Code of Federal Regulations Sections 206.31–206.48 provide the statutory framework for a presidential declaration of an emergency or a declaration of a major disaster. Such declarations open the way for a wide range of federal resources to be made available to assist in dealing with an emergency or major disaster. The Stafford Act structure for the declaration process reflects the fact that federal resources under this act supplement state and local resources for disaster relief and recovery. Except in the case of an emergency involving a subject area that is exclusively or preeminently in the federal purview, the governor of an affected state, or acting governor if the governor is not available, must request such a declaration by the president.

Risk Assessment and Regional Screening Levels

EPA and DTSC use risk assessments to characterize the nature and magnitude of health risks to humans and ecological receptors from chemical contaminants and other stressors that may be present in the environment. In general terms, risk depends on the following three factors: how much of a chemical is present in an environmental medium (air, soil, or water), how much contact (exposure) a person or ecological receptor has with the contaminated environmental medium, and the inherent toxicity of the chemical. EPA developed regional screening levels (RSLs) that provide a unified set of screening level/preliminary remediation goals for all EPA regions for screening chemical contaminants at Superfund sites. The RSLs replaced the preliminary remediation goals in 2008. The RSLs are calculated using the latest toxicity values, default exposure assumptions, and physical and chemical properties. EPA considers RSLs to be protective for humans (including sensitive groups) over a lifetime. Under most circumstances, the presence of a chemical in soil, soil gas, or indoor air at concentrations below the corresponding RSLs can be assumed to not pose a significant health risk to people who may live (residential RSLs) or work (commercial/industrial RSLs) at the site. The EPA RSL tables were most recently updated in November 2018.

The DTSC Human and Ecological Risk Office (HERO) incorporated the EPA RSLs into the HERO human health risk assessment. The HERO review of the EPA RSLs determined that the revised RSLs included some levels that were substantially higher, and therefore less protective, than the previous preliminary remediation goals. HERO therefore created Human Health Risk Assessment Note 3, which incorporates HERO recommendations and DTSC-modified screening levels based on review of the EPA RSLs. The DTSC-modified screening levels should be used in conjunction with the EPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities. The HERO Human Health Risk Assessment Note 3 was most recently updated in April 2019.

State

California Emergency Services Act

The California Emergency Services Act was adopted to establish the state's role and responsibilities during human-caused or natural emergencies that result in conditions of disaster and/or extreme peril to life, property, or the resources of the state. The California Emergency Services Act is intended to protect health and safety by preserving the lives and property of the people of the state. The Office of Emergency Services coordinates the responses of other agencies, including CalEPA, California Highway Patrol, the RWQCBs, air quality management districts, and county disaster response offices.

Emergency Response to Hazardous Materials Incidents

California has developed an emergency response plan to coordinate emergency services provided by federal, state, and local government, as well as private agencies. The emergency response plan is administered by the California Emergency Management Agency and includes response to hazardous materials incidents. The California Emergency Management Agency coordinates the response of other agencies, including CalEPA, California Highway Patrol, California Department of Fish and Wildlife, the RWQCBs, San Diego Air Pollution Control District, San Diego Fire–Rescue Department (SDFD), and the DEHQ Hazardous Incident Response Team.

Hazardous Waste and Substances Sites List

The Hazardous Waste and Substances Sites List (Cortese List) is a planning document used by the state, local agencies, and developers to comply with California Environmental Quality Act (CEQA) requirements by providing information about the location of hazardous materials release sites. Government Code Section 65962.5(a) requires CalEPA to develop an updated Cortese List annually, at minimum. DTSC is responsible for a portion of the information contained in the Cortese List. Other state and local government agencies are required to provide additional hazardous materials release information for the Cortese List.

Hazardous Materials Release Response Plans and Inventory

Two programs found in the California Health and Safety Code, Chapter 6.95, are directly applicable to the CEQA issue of risk due to hazardous substances release: the Hazardous Materials Business Plan Program and the CalARP Program. In the San Diego region, DEHQ is responsible for implementing these two programs, which provide threshold quantities for regulated hazardous substances. When the indicated quantities are exceeded, a hazardous materials business plan or risk management plan is required pursuant to the regulation. Congress requires EPA Region 9 to make risk management plan information available to the public through EPA's Envirofacts data warehouse. Envirofacts is considered the single point of access to select EPA environmental data.

Senate Bill 1889 – Accidental Release Prevention Law/CalARP Program

Senate Bill 1889 required California to implement a new federally mandated program governing the accidental airborne release of chemicals promulgated under Section 112 of the Clean Air Act. Effective January 1, 1997, the Accidental Release Prevention Law/CalARP Program replaced the previous California Risk Management and Prevention Program and incorporated the mandatory federal requirements. The CalARP Program addresses facilities that contain specified hazardous materials (known as regulated substances) that, if involved in an accidental release, could result in adverse off-site consequences. The CalARP Program defines regulated substances as chemicals that

pose a threat to public health and safety or the environment because they are highly toxic, flammable, or explosive.

Title 14, Division 1.5 of the California Code of Regulations

Title 14, Division 1.5, of the California Code of Regulations establishes the regulations for the California Department of Forestry and Fire Protection and is applicable in all State Responsibility Areas where the California Department of Forestry and Fire Protection is responsible for wildfire protection. Development within State Responsibility Areas must comply with these regulations. Among other things, Title 14 establishes minimum standards for emergency access, fuel modification, project site line setbacks, signage, and water supply.

Title 22 of the California Code of Regulations and Hazardous Waste Control Law, Chapter 6.5

DTSC regulates the generation, transportation, treatment, storage, and disposal of hazardous waste under RCRA and the California Hazardous Waste Control Law. Both laws impose "cradle to grave" regulatory systems for handling hazardous waste in a manner that protects human health and the environment. CalEPA has delegated some of its authority under the Hazardous Waste Control Law to county health departments and other Certified Unified Program Agencies, including DEHQ.

Underground Storage Tank Act

The Underground Storage Tank Act monitoring and response program is required under Chapter 6.7 of the California Health and Safety Code and Title 23 of the California Code of Regulations. The program was developed to ensure that facilities meet regulatory requirements for design, monitoring, maintenance, and emergency response in operating or owning underground storage tanks. DEHQ is the administering agency for this program in the project area.

California Occupational Safety and Health Administration

Cal/OSHA is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are required to be "as effective as" federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR 330 et seq.). The regulations specify requirements for employee training, availability of safety equipment, accident prevention programs, and hazardous substance exposure warnings. The employer is also required, among other things, to have an illness and injury prevention program.

Cal/OSHA Asbestos and Carcinogen Unit

The Cal/OSHA Asbestos and Carcinogen Unit enforces asbestos standards in construction, shipyards, and general industry. This includes identification and removal requirements of asbestos in buildings, as well as health and safety requirements of employees performing work under the Asbestos-In-Construction regulations (8 CCR 1529). Only a Cal/OSHA-certified asbestos consultant can provide asbestos consulting (as defined in Business and Professions Code Sections 7180–7189.7 and triggered by the same size and concentration triggers as for registered contractors). These services include building inspection, abatement project design, contract administration, supervision of site surveillance technicians, sample collection, preparation of asbestos management plans, and clearance air monitoring.

California Department of Public Health

The California Department of Public Health enforces lead laws and regulations related to the prevention of lead poisoning in children, prevention of lead poisoning in occupational workers, accreditation and training for construction-related activities, lead exposure screening and reporting, disclosures, and limitations on the amount of lead found in products. Accredited lead specialists are required to find and abate lead hazards in a construction project and to perform lead-related construction work in an effective and safe manner.

Local

County of San Diego Department of Environmental Health and Quality

DEHQ protects public health and safeguards environmental quality, educates the public to increase environmental awareness, and implements and enforces local, state, and federal environmental laws. DEHQ regulates the following: retail food safety, public housing, public swimming pools, small drinking-water systems, mobile-home parks, on-site wastewater systems, recreational water, oversight and cleanup of aboveground storage tanks and underground storage tanks, and medical and hazardous materials and waste.

County of San Diego Office of Emergency Services

The Unified San Diego County Emergency Services Organization has primary responsibility for preparedness and response activities and addresses disasters and emergency situations within the unincorporated area of the County. The County of San Diego Office of Emergency Services serves as staff to the Unified Disaster Council, the governing body of the Unified San Diego County Emergency Services Organization. Emergency response and preparedness plans include the operational area emergency response plan and the County MHMP.

San Diego Air Pollution Control District

Under Regulation XI, Subpart M – National Emission Standards for Asbestos, Rule 361.145 – Standard for Demolition and Renovation, the San Diego Air Pollution Control District requires that the proponent of a proposed demolition or renovation project submit an asbestos demolition or renovation operational plan notice of intention at least 10 days prior to the onset of any asbestos stripping or removal work. The notice of intention is required for all demolition projects, regardless of the presence of asbestos.

Multi-Jurisdictional Hazard Mitigation Plan

The City is a participating jurisdiction in the County MHMP, a Countywide plan that identifies risks and minimizes damage from natural and human-caused disasters. The MHMP includes an overview of the risk assessment process, vulnerability assessments, and hazards present in each jurisdiction of the County. Hazards profiled in the plan include wildfire, structure fire, flood, coastal storms, erosion, tsunami, earthquakes, liquefaction, rain-induced landslide, dam failure, hazardous materials incidents, nuclear materials release, and terrorism. The MHMP sets forth a variety of objectives and actions based on a set of broad goals, including the following: (1) promoting disaster-resistant future development; (2) increasing public understanding and support for effective hazard mitigation; (3) building support of local capacity and commitment to become less vulnerable to hazards; (4) enhancing hazard mitigation coordination and communication with federal, state, local, and tribal governments; and (5) reducing the possibility of damage and losses to existing assets, particularly people, critical facilities, or infrastructure, and County-owned facilities, due to dam failure, earthquake, coastal storm, erosion, tsunami, landslides, floods, structural fire/wildfire, and human-caused hazards.

San Diego County Site Assessment and Mitigation Program

DEHQ maintains the Site Assessment and Monitoring (SAM) Program list of contaminated sites that have previously undergone or are currently undergoing environmental investigations and/or remedial actions. The County SAM Program has a primary purpose to protect human health, water resources, and the environment within the County by providing oversight of assessments and cleanups in accordance with the California Health and Safety Code and the California Code of Regulations. The SAM Program's voluntary assistance program also provides staff consultation, project oversight, and technical or environmental report evaluation and concurrence (when appropriate) on projects pertaining to properties contaminated with hazardous substances.

San Diego County Emergency Operations Plan

The County EOP's operational area consists of 19 jurisdictions that range in population from several thousand to more than 1 million, with a total estimated population of more than 3.3 million. To foster a regional approach, the cities and the County joined together in 1961 to form an operational area and entered into a joint powers authority. The joint powers authority establishes procedures and protocols for participants to assist one another in the event of a disaster or major emergency exceeding the capabilities of any single jurisdiction.

City of San Diego Municipal Code

Hazardous Materials

The Hazardous Waste Establishment Division of the San Diego Municipal Code (SDMC) (Chapter 4, Article 2, Division 8) enables the City's health officer to establish a program to monitor establishments where hazardous wastes are produced, stored, handled, disposed of, treated, or recycled and to provide health care information and other appropriate technical assistance on a 24-hour basis to emergency responders in the event of a hazardous waste incident involving community exposure. The Disclosure of Hazardous Materials Division (SDMC Chapter 4, Article 2, Division 9) establishes a system for the provision of information on potential hazards or hazardous materials in the community, including appropriate education and training for use of information. Elements of the system include the health officer's ability to seek advice from the Hazardous Materials Advisory Committee, the filing of a hazardous substance disclosure form, the content of the disclosure form, emergency response information, and penalties for violations.

Airport Land Use Compatibility Zone

The SDMC addresses issues related to safety compatibility in the Airport Land Use Compatibility Overlay Zone. Chapter 13, Article 2, Division 15, establishes the Airport Land Use Compatibility Overlay Zone, which ensures that new development located within an airport influence area for MCAS Miramar, Montgomery-Gibbs Executive Airport, Brown Field, and Gillespie Airport is compatible with respect to airport-related noise, public safety, airspace protection, and aircraft overflight areas. Regulations include safety compatibility and aircraft overflight notification.

Brush Management

The City's brush management regulations (SDMC Section 142.0412) are intended to minimize wildland fire hazards through prevention activities and programs. These regulations require the provision of mandatory setbacks, irrigation systems, regulated planting areas, and plant

maintenance in specific zones and are implemented at the project level through the grading and building permit process.

Brush management is required in all base zones on publicly or privately owned premises that are within 100 feet of a structure and contain native or naturalized vegetation. The City requires brush management plans for all new development. These plans are intended to reduce the risk of significant loss, injury, or death involving wildland fires. Unless otherwise approved by the City fire marshal, the brush management plans for all future development would consist of two separate and distinct zones, as follows:

- **Zone One:** the area adjacent to structures where flammable materials would be minimized through the use of pavement and/or permanently irrigated ornamental landscape plantings. This zone is not allowed on slopes with a gradient greater than 4:1.
- **Zone Two:** the area between Zone One and any area of native or non-irrigated vegetation. This zone would consist of thinned native or naturalized vegetation.

Modifications to the standard defensible space dimensions may be approved based on the site plan and site conditions. The fire chief may allow the implementation of alternative compliance measures to achieve an equivalency of a full defensible space as allowed under Section 142.0412(i). Approval of such measures is based on documentation that addresses topography, existing or potential fuel loads, and other characteristics related to fire protection and the context of the proposed development.

City of San Diego General Plan

The Public Facilities, Services, and Safety Element of the City of San Diego General Plan (General Plan) presents goals and policies relating to hazardous materials and disaster preparedness (City of San Diego 2022). Further, the Land Use Element of the General Plan includes goals and policies related to airport hazards, including Policy LU-G.6, which requires all development projects to notify the Federal Aviation Administration in areas where the proposed development meets the notification criteria as defined by Code of Federal Regulations Title 14, Part 77 (City of San Diego 2015).

5.8.3 IMPACTS ANALYSIS

5.8.3.1 Issue 1: Hazardous Emissions and Hazardous Materials

Issue 1: Would the project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?

Thresholds

Based on the City's Significance Determination Thresholds (City of San Diego 2022), impacts related to health and safety would be significant if a project would:

- Result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school.

Impact Analysis

Construction

As mentioned, a case is still open under DEHQ, and DEHQ would identify cleanup requirements after review of the project plans. Construction and demolition activities associated with the project, including handling and transporting hazardous construction material and the excavation of impacted soil, could release hazardous materials into the environment. Construction of the project would involve the transport of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents. 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. However, these materials would be used and stored in designated construction staging areas within the boundaries of the project site, and once the project has been constructed, any remaining materials would be transported off site. These materials would be transported, handled, and disposed of in accordance with all applicable federal, state, and local laws and regulations pertaining to the management and use of hazardous materials. Consequently, use of these materials for their intended purpose would not pose a significant risk to the public or environment. As described in Project Design Feature (PDF)-HAZ-1, the project owner/permittee would be required to complete cleanup requirements prior to issuance of building permits in accordance with regulations. Remediation would be overseen by DEHQ or DTSC.

Asbestos and Lead-Based Paint

Based on the age of the structures, there is a potential for ACM and LBP to be present within the building materials. Demolition of the existing residential structures and handling of the resultant debris could result in a release of hazardous materials, which could impact both on-site construction

personnel and the nearby general public during transportation. LBP and ACM remediation would occur in accordance with regulations. A hazardous material building survey, including LBP and ACM testing, would be conducted in the existing residential structure. Identified materials would be removed and disposed of in accordance with applicable laws and regulations, including San Diego Air Pollution Control District Regulation XI, Subpart M; Cal/OSHA Asbestos rules; California Department of Public Health lead laws and regulations; and CalEPA disposal requirements.

Impacted Soils

As discussed in the Phase I ESA (Appendix G2), a large amount of undocumented fill had been brought to the project site during previous construction activities. The Phase I ESA determined there was a potential for contaminants of concern (COCs) to be present in the undocumented fill, as the source of the fill material was unknown. As such, a Phase II ESA (Appendix G3) was prepared. The Phase II ESA identified COCs within the undocumented fill, as well as other areas of undocumented fill. COCs in soils included total petroleum hydrocarbons, lead, and arsenic. A human health risk assessment was conducted as part of the Phase II ESA, which concluded total petroleum hydrocarbon concentrations are above unacceptable risks to human health; lead is not above an unacceptable risk to human health, but levels of lead in some portions of the soil exceed hazardous waste toxicity requirements (i.e., would require disposal as hazardous waste); and arsenic, while above human health screening levels, is generally below natural background concentrations. However, the project is not within 0.25 miles of an existing or proposed school and there would be no impact to schools.

The Phase II ESA recommended completion of a soil management plan (SMP), which was prepared and is included as Appendix G4. The SMP outlines the COCs in soil, their concentrations, and proposed protective measures to eliminate future risk of exposure to human health and the environment. Construction would include excavation and relocation of much of the undocumented fill area. The SMP includes health and safety procedures and environmental oversight protocol to protect on-site workers from potential contamination during construction.

Additionally, the Phase II ESA recommended the preparation of a community health safety plan (CHSP). A CHSP has been prepared and is included as Appendix G1 to address the potential issues associated with possible impacts to the community in the project site vicinity, particularly the monitoring and suppression of dust, if any, generated by construction activities. Refer to Appendices G-1, G-2, G-3, and G-4 for further details. As described in PDF-HAZ-1, the project owner/permittee would be required to complete cleanup requirements prior to issuance of building permits. Remediation would be overseen by DEHQ or DTSC.

Volatile Organic Compounds and Methane

The Phase II ESA also evaluated soil vapor conditions, including volatile organic compounds and methane. Volatile organic compound constituents' benzene, chloroform, and naphthalene were reported above their respective reporting limits and were determined in the human health risk assessment to represent a human health and safety concern. Additionally, methane concentrations represent an explosion risk, as methane is a flammable gas. The project is not within 0.25 miles of an existing or proposed school.

Operation

Once constructed, the project site would contain residential dwelling units and open space areas. Hazardous materials associated with the residential land uses and landscaping would be limited to private use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. Although the project would increase the amount of dwelling units on site, resulting in an increased use of commercially available potentially hazardous materials, the use of these substances would be subject to all applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials.

The human health risk assessment prepared as part of the Phase II ESA identified human health risk to future occupants from both contaminated soils and soil vapor (Appendix G3). As such, the SMP includes proposed measures to remove contaminated soils that qualify as hazardous waste and present a risk to groundwater contamination; cap remaining contaminated soils beneath 10 feet of clean fill; and conduct soil vapor investigations at each residence within 100 feet of any soils derived from the undocumented fill area. The SMP also outlines soil vapor screening criteria, as well as measures required to install vapor barriers to eliminate potential risks to future occupants from both volatile organic compounds and methane intrusion. Should vapor barriers be required, based on the criteria outlined in the SMP, the SMP also establishing institutional controls to require proper maintenance and protection of vapor barriers throughout the life of the property. Remediation of contaminated soil and soil vapor is typically a condition of approval required as part of regulatory compliance. Identified materials would be remediated in accordance with applicable laws and regulations.

Project conformance with standard local, state, and federal regulations pertaining to the routine transport, use, storage, or disposal of hazardous materials or hazardous wastes would ensure that potential adverse effects would be minimized and that such substances would be handled appropriately in the event of accidental release and would not result in hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an

existing or proposed school. The closest school to the project site, EB Scripps Elementary School, is 0.7 miles northwest of the site. The project site is not within 0.25 miles of an existing school or proposed school.

Significance of Impact

Demolition of on-site structures and construction of the proposed project would be completed in accordance with regulations and would not result in a significant potential to release asbestos and lead particles to the environment. As indicated in PDF-HAZ-1, the project would be required to complete any soil remediation, CHSP, and PDFs under the oversight of DEHQ/DTSC in conformance with regulations. Further, the project site is not located within 0.25 miles of a school; therefore, no impact to schools would occur.

Mitigation Measures

As no impact would occur, no mitigation is required.

5.8.3.2 Issue 2: Hazardous Materials Site

Issue 2: Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment?

Thresholds

Based on the City's Significance Determination Thresholds (City of San Diego 2022), impacts related to health and safety would be significant if the project is:

- Located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Impact Analysis

As discussed in Section 5.8.1, Existing Conditions, the project site, under the name Cypress Canyon, was identified on the GeoTracker, or RWQCB, database as a Cleanup Program Site. The DTSC previously requested oversight of this cleanup case considering their previous involvement at the site and nearby cases. The Cleanup Program Site status is open for assessment and interim remedial action as of February 2024. Additionally, the site is listed on multiple databases for a former school evaluation (through DTSC) and a current open voluntary cleanup agreement through DEHQ. The open voluntary cleanup agreement is associated with COCs in the undocumented fill and

proposed protective measures (Appendices G-1 through G-4). Impacts associated with these listings are discussed under Section 5.8.3.1.

Based on the results of the Phase I ESA (Appendix G2) and the recent review of regulatory records (Section 5.8.1), no other off-site records were identified that would pose an environmental concern to the proposed project activities.

Significance of Impact

The project site is located at a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Demolition of on-site structures and construction of the proposed project would be completed in accordance with regulations and would not result in a significant potential to release asbestos and lead particles to the environment. As indicated in PDF-HAZ-1, the project would be required to complete any soil remediation, CHSP, and PDFs under the oversight of DEHQ/DTSC in conformance with regulations. Impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.8.3.3 Issue 3: Toxic Substances from Previous Agricultural Uses

Issue 3: Would the project expose people to toxic substances, such as pesticides and herbicides, some of which have long-lasting ability, applied to the soil during previous agricultural uses?

Thresholds

Based on the City's Significance Determination Thresholds (City of San Diego 2022), impacts related to health and safety would be significant if the project would:

- Expose people to toxic substances, such as pesticides and herbicides, some of which have long-lasting ability, applied to the soil during previous agricultural uses.

Impact Analysis

As described in Appendix G2, the project site does not have a known history of agricultural uses. However, as described in Section 5.8.1, the Cleanup Program Site cases (DEH2020-LSAM-000640 and T10000016581) indicate the site has potential contamination from petroleum hydrocarbons, metals, and pesticides related to undocumented fill. The management and use of hazardous materials would occur in accordance with all applicable federal, state, and local laws and regulations and

would not result in a significant hazard to the public or environment. Therefore, the project would not expose people to toxic substances from previous agricultural uses.

Significance of Impact

The project site would comply with applicable regulations associated with hazardous materials; therefore, impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.8.3.4 Issue 4 and 5: Airport Hazards

Issue 4: Would the project result in a safety hazard for people residing or working within two miles of a private airstrip or a private airport or helicopter facility that is not covered by an adopted Airport Land Use Compatibility Plan?

Issue 5: Would the project result in a safety hazard for people residing or working within two miles of a private airstrip or a private airport or helicopter facility that is not covered by an adopted Airport Land Use Compatibility Plan?

Thresholds

Based on the City's Significance Determination Thresholds (City of San Diego 2022), impacts related to health and safety would be significant if the project would:

- Result in a safety hazard for people residing or working in a designated airport influence area or
- Result in a safety hazard for people residing or working within two miles of a private airstrip or a private airport or helicopter facility that is not covered by an adopted Airport Land Use Compatibility Plan.

Impact Analysis

The project site is not within the vicinity of a public airport, public air strip, or heliport facility, nor is it located within the boundaries of any airport land use plans. The nearest airport is MCAS Miramar located approximately 4 miles to the southwest. The project site is not within any MCAS Miramar influence areas (ALUC 2011).

Significance of Impact

The project would not result in a safety hazard for people residing or working within 2 miles of a private airstrip or a private airport or helicopter facility that is not covered by an adopted airport land use compatibility plan and is not located a designated airport influence area. No impact would occur.

Mitigation Measures

As no impact would occur, no mitigation would be required.

5.8.3.5 Issue 6: Wildland Fires

Issue 6: Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Thresholds

Based on the City's Significance Determination Thresholds (City of San Diego 2022), impacts related to health and safety would be significant if the project would:

- Expose people or structures to significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Impact Analysis

As described in Section 5.19.3.2, the entire project site is designated as a Very High Fire Hazard Severity Zone (City of San Diego 2021). The project is required to implement brush management zones (BMZs) to minimize wildland fire hazards, but the project site is constrained by existing site conditions. The project would include one fully irrigated Zone 1 BMZ extending up to 57 feet from the single-family structures and up to 80 feet from the multifamily units to the point where manufactured slopes transition from 4:1 to 2:1. The existing conditions around the project site include sensitive habitat and Multi-Habitat Planning Area lands to the north, east, south, and southwest. A portion of these sensitive areas, along with lot constraints, make it impossible to achieve a standard BMZ. The strip of land between the manufactured slope and the western property boundary of Lot 100 would be a homeowner's association maintained open space area. Alternative compliance measures for portions of the project site that are not able to meet the standard BMZ width requirements are identified in Table 5.19-1, Alternative BMZ Compliance Measures, in Section 5.19.3. Table 5.19-1 in Section 5.19.3 outlines which specific alternative

measures are applied to each lot. The project would comply with the City's landscape regulations, including brush management requirements. The proposed BMZs (including the alternative compliance measures) would not increase hazards to on-site structures from wildland fires and hazards to adjacent properties. In addition, all habitable structures would be equipped with automatic alarm and sprinkler systems and would have fire resistant construction per Chapter 7A of the California Building Code. The City's Landscape and Fire Review staff have reviewed the Brush Management Plan and concluded that it adequately addresses the fire safety potentially affecting the project site. The project and identified project features have been designed in accordance with the City's Landscape Regulations. Please refer to Section 5.19.3.2 for additional information.

Significance of Impact

The project would comply with applicable state and City standards associated with fire hazards and prevention, including alternative compliance measures. Therefore, potential impacts related to wildfire hazards would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.8.3.6 Issue 7: Impair Emergency Response Plan or Emergency Evacuation Route

Issue 7: Would the project impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Thresholds

Based on the City's Significance Determination Thresholds (City of San Diego 2022), impacts related to health safety would be significant if the project would:

- Impair implementation of, or physically interferes with an adopted emergency response plan or emergency evacuation plan.

Impact Analysis

The project may result in a temporary increase in traffic on roadways surrounding the project site due to increased truck loads or the transport of construction equipment to and from the project site during the construction period. All construction activities including staging would occur in accordance with City requirements, which would ensure that adequate emergency access would be provided during construction of the project. For the export of lead-bearing soil from the project site, traffic control devices would be established as required by the City. Additionally, a haul route permit

would be obtained from the City if required (Appendix G1). During construction, per the CHSP, in the event of an emergency, work at the project site would be stopped. The exclusion zone would be maintained, with only authorized site workers and emergency services and personnel being allowed into the exclusion zone. In the event of a fire, no attempt would be made to fight the fire; however, 9-1-1 would be called and potentially flammable materials would be moved from the path of the fire to an area judged to be safe. Emergency response to the project site would be serviced by the SDFD and City of San Diego Police Department.

Additionally, the County's EOP (County of San Diego 2022) identifies a broad range of potential hazards and a response plan for public protection. The EOP identifies major interstates and highways within the County that could be used as primary routes for evacuation. As part of the emergency response efforts, the San Diego Office of Homeland Security oversees emergency preparedness and response services for disaster-related measures, including administration of the City's EOC and alternate EOC (City of San Diego 2020). The project would result in an increase in traffic during operation due to the increase in population at the site. Per the Vehicle Miles Traveled Analysis (Appendix B1 to this EIR), the proposed project is anticipated to add 1,096 average daily trips to and from the project site.

A site-specific evacuation plan has been prepared, which can be found in Appendix N. The evacuation plan was prepared in accordance with the City's Emergency Operations Procedures (City of San Diego 2010), the County EOP, the Unified San Diego County Emergency Services Organization, and the County of San Diego Operational Area Emergency Operations Plan – Evacuation Annex. The evacuation plan has identified that the primary roadways for evacuation from the project site would include Scripps Poway Parkway, Spring Canyon Road, Scripps Ranch Boulevard, Mira Mesa Boulevard, and Interstate 15. The project site is located approximately 2.5 miles east of Interstate 15. From these primary roadways, evacuees will be provided access to major traffic corridors including Interstate 15 and State Route 56 (Appendix N), which are identified in the EOP as emergency evacuation routes for the County (County of San Diego 2022). During a project emergency evacuation, the primary and secondary roadways may be providing citizen egress while responding emergency vehicles are inbound. As the project is located in the western most portion of the Scripps Miramar Ranch Community Plan area, project traffic would evacuate west through the Miramar Ranch North community.

The potential for a large evacuation event including evacuation of existing populations is minimal, but possible. In this case, the existing populations would be associated with Miramar Ranch North community residences, Dingeman Elementary, EB Scripps Elementary, and commercial and industrial-office uses. With the addition of the project to the evacuation of the Scripps Miramar Ranch Community Plan and Miramar Ranch North Community Plan, under the worst-case scenario, the project would increase the evacuating population by 312 to a total of 17,870 and the number of

evacuating vehicles would increase by 224 to a total of 10,752 vehicles evacuating the Miramar Ranch North Area. Under existing conditions, estimated worst-case evacuation time is 7.02 hours or 421.2 minutes. With the project, the estimated evacuation time increases to 7.17 hours or 430.2 minutes. With the project, there is an estimated increase in the calculated evacuation travel time of up to 9 minutes for all evacuation routes. Refer to Section 5.19 for further details.

All access roads would be constructed in accordance with SDMC Sections 55.8701 and 55.8703, which outline the requirements for fire apparatus access roads and gates to ensure adequate emergency access within the project site. Because the required fire access roads throughout the area are designed to meet or exceed the County Consolidated Fire Code, including 24-foot-wide unobstructed roadways, adequate parking, turning radius, grade maximums, and roadside fuel modification zones, potential conflicts that could reduce the roadway efficiency are minimized, allowing for smoother evacuations (Appendix N). As discussed in Section 5.2, Transportation, the current termini of Lakehurst Avenue is a three-legged intersection with a one-way stop at Lakehurst Avenue. The proposed vacation of Lakehurst Avenue would not result in any new vehicular trips or change the existing configuration of the Lakehurst Avenue/Pocahontas Avenue intersection that would impair emergency response. Therefore, the proposed project would not impair the implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

While the project would increase the number of vehicles in the project area, the number of vehicles added is not expected to significantly impact the capacity of the evacuation routes identified in proximity to the project site. Additionally, the project would comply with SDMC and fire code road requirements that would allow for emergency ingress/ egress. The project does request a deviation from SDMC Section 142.0560(j)(1), Table 42-05N, to allow for an increased driveway width for the proposed 100 single-family dwelling units and a deviation from the City of San Diego 2017 Street Design Manual minimum curve radius, to allow a decreased curve radius with chokers as mitigation, which would not result in access issues for emergency personnel or evacuating residents. The project would not impair the implementation of or physically interfere with the EOP. Additionally, the project is subject to review by SDFD and the San Diego Police Department to ensure compliance with applicable safety standards.

Significance of Impact

The project would not impair or physically interfere with an adopted emergency response or evacuation plan, and impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.9 HISTORICAL RESOURCES

This section describes the existing historical resources conditions of the proposed Renzulli Estates Project (project) site, identifies associated regulatory requirements, and evaluates potential impacts related to the implementation of the project. The following discussion is based on the Negative Cultural Resources Letter Report prepared by Dudek (October 2023) and included as Appendix H.

5.9.1 EXISTING CONDITIONS

Existing Physical Conditions

Currently, the project site is primarily undeveloped, with the exception of an existing large residence, several outbuildings, and two associated sheds. Dirt roads also extend through the site, and there has been previous grading in several areas of the site due to the previous on-site uses as well as the surrounding development. The project site is surrounded by existing residential development, open space, and Cypress Canyon Park to the east of the project site.

Cultural Setting

Evidence for continuous human occupation within the San Diego region spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad time frame have led to the development of several cultural chronologies; some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions. Each of these reconstructions describes essentially similar trends in assemblage composition in more or less detail. It is important to note that Kumeyaay Native American aboriginal lifeways did not cease at European contact. Protohistoric refers to the chronological trend of continued Native American aboriginal lifeways at the cusp of the recorded historic period in the Americas.

As recognized in 2001 by State Assembly Joint Resolution No. 60, the Kumeyaay Nation occupied the Southern California and Baja California region, including the City of San Diego (City) and the project site. The Kumeyaay are the identified most likely descendants (MLDs) for all Native American human remains found in the City.

For additional details on the cultural and historical setting of the project, refer to the cultural report included as Appendix H of this environmental impact report (EIR).

Records Search Results

An examination of existing maps, records, and reports was conducted to determine if there are any previously recorded cultural resources at the project site or vicinity. A records search was completed

on March 8, 2019, through the South Coastal Information Center (SCIC) by Brian F. Smith and Associates Inc. The search encompassed the project site and a 1-mile buffer around the project site. In addition to a review of previously prepared site records and reports, the records search also reviewed historical maps of the project area, ethnographies, the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and Archaeological Determinations of Eligibility.

Previously Identified Cultural Resources

According to the SCIC records search, no previously recorded cultural resources are located within the project site. However, 20 previously recorded cultural resources were identified within the 1-mile buffer area search radius of the project site. Of the 20 cultural resources identified, 9 are prehistoric resources, 5 are historic resources, and 6 are prehistoric isolates.

Previous Studies

The records search revealed that 51 previous cultural resources studies have been conducted within the 1-mile radius buffer around the project site. Of the 51 studies, 2 studies intersect the project site: SD-00959 and SD-02917. Neither report identified any resources on the project site.

Native American Heritage Commission Sacred Lands File Search

The Native American Heritage Commission (NAHC) was contacted for a Sacred Lands File search on September 13, 2021 (Appendix H of this EIR). The NAHC indicated in a response, dated October 14, 2021, that the search identified no previously recorded cultural resources within the project site. The NAHC provided a contact list of tribal individuals and/or organizations that have knowledge of the cultural resources within the region. Correspondence letters were sent by Dudek to all representatives listed on the NAHC list on November 11, 2021, and no responses have been received to date.

Refer to Section 5.16, Tribal Cultural Resources, of this EIR for a discussion related to potential tribal cultural resources.

Intensive Pedestrian Survey

Dudek conducted an intensive pedestrian survey (survey) on September 13, 2021, to address the potential for previously unidentified resources within the project site. A Native American monitor was also present during the survey. The majority of the project site is undeveloped and consists of dense vegetation that obscures the ground. Furthermore, the project site comprises previously

disturbed sediments covered by residential development of the existing residence and associated structures located on the project site. During the survey, two possible cultural resource locations previously identified by Brian F. Smith and Associates Inc. were revisited. However, after surveying both locations, Dudek does not recommend either of the locations as a cultural resource. as the resources had no evidence that the site was prehistoric, and no cultural materials were identified. No new archaeological resources or built environment resources were identified during the survey of the project site. Additionally, no artifacts were collected during the survey.

Built Environment

The existing residence and two sheds are located on the project site. The existing structures on site have all been constructed since 1980; therefore, they are not more than 45 years old and do not qualify as potential historical resources under the California Environmental Quality Act (CEQA) and City's Historical Resources Regulations. The existing structures would not be eligible for the national, state, or local registers. Furthermore, the cultural report conducted for the project indicates that there is low sensitivity for identifying intact subsurface historic deposits during the implementation of the project (Appendix H~~ of this EIR~~).

5.9.2 REGULATORY FRAMEWORK

Federal

National Historic Preservation Act

The National Historic Preservation Act authorizes the NRHP, which is the United States' official list of districts, sites, buildings, structures, and objects worthy of preservation. Overseen by the National Park Service, under the U.S. Department of the Interior, NRHP listings encompass all National Historic Landmarks as well as historic areas administered by the National Park Service.

NRHP guidelines for the evaluation of historic significance were developed to be flexible and to recognize the accomplishments of all who have made significant contributions to the nation's history and heritage. Its criteria are designed to guide state and local governments, federal agencies, and others in evaluating potential entries in the NRHP. For a property to be listed in or determined eligible for listing, it must be demonstrated to possess integrity and to meet at least one of the following criteria:

The quality of significance in American history, architecture, archaeology, engineering, and culture is 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.

Integrity is defined in NRHP guidance, How to Apply the National Register Criteria, as "the ability of a property to convey its significance. To be listed in the NRHP, a property must not only be shown to be significant under the NRHP criteria, but it also must have integrity" (NPS 1990). NRHP guidance further asserts that certain property types are not considered eligible for listing in the NRHP, except under certain circumstances (NPS 1990).

A historic property is defined as "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the NRHP criteria" (36 Code of Federal Regulations [CFR] Sections 800.16[i][1]).

Effects on historic properties under Section 106 of the National Historic Preservation Act are defined in the assessment of adverse effects in 36 CFR Sections 800.5(a)(1):

> An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

To comply with Section 106, the criteria of adverse effect are applied to historic properties, if any exist in the project site, pursuant to 36 CFR Sections 800.5(a)(1). If no historic properties are identified in the project site, a finding of "no historic properties affected" will be made for the project. If there are historic properties in the project site, application of the criteria of adverse effect will result in project-related findings of either "no adverse effect" or of "adverse effect," as described above. A finding of no adverse effect may be appropriate when the undertaking's effects do not meet the thresholds in criteria of adverse effect 36 CFR Sections 800.5(a)(1), in certain cases when

the undertaking is modified to avoid or lessen effects, or if conditions were imposed to ensure review of rehabilitation plans for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (codified in 36 CFR Part 68).

If adverse effects findings were expected to result from the project, mitigation would be required, as feasible, and resolution of those adverse effects by consultation may occur to avoid, minimize, or mitigate adverse effects on historic properties pursuant to 36 CFR Part 800.6(a).

State

California Register of Historical Resources

In California, the term "historical resource" includes, but is not limited to, "any object, building, structure, site, area, place, record, or manuscript that is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (California Public Resources Code Section 5020.1[j]). In 1992, the California legislature established the CRHR "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (California Public Resources Code Section 5024.1[a]). A resource is eligible for listing in the CRHR if the State Historical Resources Commission determines that it is a significant resource and that it meets any of the following NRHP criteria (California Public Resources Code Section 5024.1[c]):

~~1.~~ Associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage

1.

2. Associated with the lives of persons important in our past

~~3.~~ 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

3.

~~1.~~4. Has yielded, or may be likely to yield, information important in prehistory or history

Resources less than 50 years old generally are not considered for listing in the CRHR but may be considered if it can be demonstrated that sufficient time has passed to understand the historical importance of the resource (see 14 CCR, Section 4852[d][2]).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing on the NRHP are automatically listed on the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties

designated under local ordinances or identified through local cultural resource surveys. The State Historic Preservation Office maintains the CRHR.

Native American Historic Cultural Sites

The Native American Historic Resource Protection Act (California Public Resources Code Section 5097, et seq.) addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the NAHC to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to 1 year in jail to deface or destroy a Native American historical or cultural site that is listed or may be eligible for listing in the CRHR.

California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act, enacted in 2001, requires all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. The California Native American Graves Protection and Repatriation Act also provides a process for the identification and repatriation of these items to the culturally affiliated tribes.

California Health and Safety Code, Section 7050.5

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and 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 Health and Safety Code Section 7050.5b). If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the NAHC within 24 hours (California Health and Safety Code Section 7050.5c). The NAHC will notify the MLD. With the permission of the landowner, the MLD may inspect the site of discovery. The inspection must be completed within 24 hours of notification of the MLD by the NAHC. The MLD may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

California Environmental Quality Act

As described further below, the following CEQA statute and CEQA Guidelines are relevant to the analysis of historic, archaeological, and tribal cultural resources:

1. California Public Resources Code Section 21083.2(g): Defines "unique archaeological resource."
2. California Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5(a): Define historical resources. In addition, CEQA Guidelines Section 15064.5(b) defines the phrase "substantial adverse change" in the significance of a historical resource. It also defines the circumstances when a project would materially impair the significance of a historical resource.
3. California Public Resources Code Section 21074(a): Defines "tribal cultural resources" and Section 21074(b): Defines a "cultural landscape."
4. California Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5(e): These provisions set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
5. California Public Resources Code Sections 21083.2(b)-(c) and CEQA Guidelines Section 15126.4: These measures provide information regarding the mitigation framework for archaeological and historic resources, including options of preservation-in-place mitigation; and identify preservation-in-place as the preferred manner of mitigating impacts to significant archaeological sites.

Under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (California Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5[b]). A "historical resource" is any site listed or eligible for listing in the CRHR. The CRHR listing criteria (14 CCR 15064.5[a][3]) are intended to examine whether the resource in question:

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 pre-history or history.

The term "historical resource" also includes any site described in a local register of historical resources or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code Section 5024.1[g]).

CEQA was amended in 2014 through Assembly Bill 52, which created a new category of tribal culture resources that must be considered under CEQA (see Section 5.16) and applies to all projects that file a Notice of Preparation or notice of negative declaration or mitigated negative declaration on or after July 1, 2015. Assembly Bill 52 requires lead agencies to provide notice to and begin consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of a project if that tribe has requested, in writing, to be kept informed of projects by the lead agency prior to the determination whether a negative declaration, mitigated negative declaration, or EIR will be prepared.

All historical resources and unique archaeological resources—as defined by statute—are presumed to be historically or culturally significant for purposes of CEQA (California Public Resources Code Section 21084.1; 14 CCR Section 15064.5[a]). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (California Public Resources Code Section 21084.1; 14 CCR Section 15064.5[a]). A site or resource that does not meet the definition of "historical resource" or "unique archaeological resource" is not considered significant under CEQA and need not be analyzed further (California Public Resources Code Section 21083.2[a]; 14 CCR Section 15064.5[c][4]).

Pursuant to these sections, CEQA first evaluates whether a project site contains any historical resources, then assesses whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource's historical significance is materially impaired.

When a project significantly affects a unique archaeological resource, CEQA imposes special mitigation requirements.

Finally, CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are set forth in California Public Resources Code Section 5097.98.

Local

City of San Diego Historical Resource Regulations

The City's Historical Resources Regulations (San Diego Municipal Code [SDMC] Chapter 14, Article 3, Division 2) were adopted in January 2000 and updated April 2024, providing a balance between sound historic preservation principles and the rights of private property owners. The purpose and intent of the regulations are outlined as follows:

> To protect, preserve and, where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures or historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. These regulations are intended to assure 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 within the City when cultural resources are present within the premises regardless of the requirement to obtain 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 Section 106 of the National Historic Preservation Act of 1966. Historical resources, in the context of the City's regulations, include designated historical resources, historical buildings, historical structures, historical objects, important archaeological sites, historical districts, historical landscapes, or traditional cultural properties. Designated historical resources include historical buildings, historical districts, historical landscapes, historical objects, historical structures, important archaeological sites, or traditional cultural properties that have been designated by the Historical Resources Board. These resources are usually over 45 years old, and they may have been altered or still be in use.

Compliance with the regulations begins with the determination of the need for a site-specific survey for a project. Pursuant to SDMC Section 143.0212(a), a historic property (built environment) survey can be required for any parcel containing a structure that is over 45 years old and not located within any area identified as exempt in the Historical Resource Guidelines or for any parcel identified as sensitive on the Historical Resource Sensitivity Map. SDMC Section 143.0212(b) requires that historical resource sensitivity maps be used to identify properties in the City that have a likelihood of containing archaeological sites. These maps are based on records of the California Historical Resources Information System maintained by the SCIC at San Diego State University, archival research from the San Diego Museum of Man, and site-specific information in the City's files. If records show an archaeological site exists on or immediately adjacent to a subject property, the City would require a survey. In general, archaeological surveys are required when the proposed development is on a previously undeveloped parcel, if a known resource is recorded on the parcel or within a 1-mile radius, or if a qualified consultant or knowledgeable City staff member recommends it. In both cases, the determination for the need to conduct a site-specific survey must be made within 10 days of submittal for a construction permit (ministerial) or 30 days for a development permit (discretionary) pursuant to SDMC Section 143.0212(c).

SDMC Section 143.0212(d) states that if a site-specific survey is required, it shall be conducted consistent with the Historical Resources Guidelines. Using the survey results and other available applicable information, the City shall determine whether a historical resource exists, whether it is eligible for designation as a designated historical resource, and precisely where it is located.

The City of San Diego Historical Resources Guidelines

Historical Resources Guidelines (City of San Diego 2022) are incorporated in the San Diego Land Development Manual by reference. The guidelines establish a development review process to review for projects in the City. This process is composed of two aspects: (1) the implementation of the Historical Resources Regulations and (2) the determination of impacts and mitigation under CEQA. The guidelines provide property owners, the development community, consultants, and the public with explicit guidelines for the management of historical resources located within City jurisdiction. These guidelines are designed to implement the City's Historical Resources Regulations contained in the Land Development Code (Chapter 14, Division 3, Article 2) in compliance with applicable local, state, and federal policies and mandates, including, but not limited to, the City's General Plan, CEQA, and Section 106 of the National Historic Preservation Act of 1966. The intent of the guidelines is to ensure consistency in the management of the City's historical resources, including identification, evaluation, preservation/mitigation, and development.

The City's Historical Resources Guidelines (City of San Diego 2022) observe the following:

> Historical resources include all properties (historic, archaeological, landscapes, traditional, etc.) eligible or potentially eligible for the National Register of Historic Places, as well as those that may be significant pursuant to state and local laws and registration programs such as the California Register of Historical Resources or the City of San Diego Historical Resources Register. "Historical resource" means 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. They include buildings, structures, objects, archaeological sites, districts or landscapes possessing physical evidence of human activities that are typically over 45 years old, regardless of whether they have been altered or continue to be used. Historical resources also include traditional cultural properties. The following definitions are based, for the most part, on California's Office of Historic Preservation's (OHP) Instructions for Recording Historical Resources and are used to categorize different types of historical resources when they are recorded.

These guidelines are intended to protect, preserve, and, where damaged, restore the historical resources of San Diego. The regulations apply to all development within the City when historical resources are present within the premises regardless of the requirement to obtain Neighborhood Development Permit or Site Development Permit. The Historical Resources Regulations require that traditional cultural properties be protected and preserved as a condition of discretionary approval. Minor alterations may be allowed if the alteration does not affect the special character or special historical, architectural, archaeological, or cultural value of the resource. Limited development may encroach into important archaeological sites if adequate mitigation measures are provided as a condition of approval. These guidelines guide the development review process from the need for a survey and how impacts are assessed to available mitigation strategies and report requirements and include appropriate methodologies for treating historical resources located in the City. In general, the City's historical resources provisions build on federal and state laws and guidelines in an attempt to streamline the process of considering impacts to historical resources within the City's jurisdiction while maintaining that some resources not significant under federal or state law may be considered historical under the City's Guidelines. In order to apply the criteria and determine the significance of potential project impacts to a historical resource, the project site must be defined for both direct impacts and indirect impacts. Indirect impacts can include increased public access to an archaeological site or visual impairment of a historically significant view shed related to a historic building or structure.

City of San Diego General Plan

The City's General Plan contains a Historic Preservation Element that seeks "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, encourage appreciation for the City's history and culture, maintain the character and identity of communities, and contribute to the City's economic vitality through historic preservation" (City of San Diego 2008). The Historic Preservation Element pertains to both historical and cultural resources that include elements from the built environment such as buildings, structures, objects, and districts; landscape features, including significant trees and plantings, hardscape, fountains, lighting, sculptures, signs and other natural or designed features; interior elements and fixtures designated in conjunction with a property; significant archaeological sites; and traditional cultural properties (City of San Diego 2008). The Historic Preservation Element contains the following goals:

A. Identification and Preservation of Historical Resources:
    - Identification of the historical resources of the City
    - Preservation of the City's important historical resources
    - Integration of historic preservation planning in the larger planning process

B. Historic Preservation, Education, Benefits, and Incentives:
    - Public education about the importance of historical resources
    - Provision of incentives supporting historic preservation
    - Cultural heritage tourism promoted to the tourist industry

Scripps Miramar Ranch Community Plan

The Scripps Miramar Ranch Community Plan (Community Plan), adopted November 1978, provides the framework for development of the Scripps Miramar Ranch community in conformance with the General Plan. The Community Plan contains a Community Environment Element, which includes objectives to preserve the significance of historic and archaeological sites, as well as a plan proposal, which indicates that any uncovered archaeological resources shall be investigated and documented (Scripps Miramar Ranch Planning Committee et al. 2018).

5.9.3 IMPACT ANALYSIS

5.9.3.1 Issue 1: Physical and Aesthetic Effects of Archaeological Sites, Structures, or Objects

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

Thresholds

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

- A resource listed in, eligible or potentially eligible for listing in the NRHP.
- A resource listed in, or determined to be eligible by, the State Historical Resources commission, for listing in the CRHR (PRC Section 5024.1).
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC, or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the PRC.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the lead agency's determination is supported by substantial evidence in

light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the CRHR (PRC Section 5024.1).

- An archaeological site consisting of at least three associated artifacts/ecofacts (within a 40-square-meter area) or a single feature.
- A "traditional cultural property." A site would be considered to possess ethnic significance if it is associated with a burial or cemetery; religious, social or transitional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the belief system of a discrete ethnic population.

The determination of the significance of impacts on historical and unique archaeological resources is based on the criteria found in Section 15064.5 of the CEQA Guidelines. 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 a historical resource would be materially impaired."

Impact Analysis

As previously discussed, a records search and survey were conducted within the project site. The entirety of the project site has been surveyed by previous studies. A search of records housed at the SCIC identified no previously recorded resources within the project site. In addition, neither the existing structures located on the project site, nor the project site itself were determined to be eligible for the national, state, or local registers and are therefore not considered historical resources for the purposes of CEQA compliance. In addition, the cultural report (Appendix H) conducted for the project indicates there is low sensitivity for identifying intact subsurface archaeological deposits during implementation of the project.

Significance of Impact

Due to the low sensitivity for identifying intact subsurface archaeological deposits, it is unlikely that buried historical resources would be encountered during ground disturbance associated with the project. Therefore, the project's potential to result in an adverse physical or aesthetic effect and/or destruction of a prehistoric or historic archaeological site, structure, or object would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.9.3.2 Issue 2: Religious and Sacred Uses

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

Thresholds

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

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

Impact Analysis

Based on the records search results and survey, no religious or sacred uses are known to exist within the project site. The SCIC records search did not identify any existing religious or sacred uses within the project site. Additionally, the NAHC Sacred Lands File did not identify sacred lands within project site. Because of the lack of existing religions or sacred uses, the project would not result in impacts to such uses.

Significance of Impact

No existing religious or sacred uses are located on the project site. No impact would occur.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.9.3.3 Issue 3: Disturbance of Human Remains

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

Thresholds

In accordance with the City's Significance Determination Thresholds (City of San Diego 2022), prehistoric and historic resource impacts shall be significant if the project would result in discovery of human remains:

- Discovery of human remains shall always be treated as a significant discovery.

Impact Analysis

There are no formal cemeteries or known burials in the immediate vicinity of the project site. In the unlikely event of a discovery of human remains, the project would be handled in accordance with procedures of the California Public Resources Code (Section 5097.98), California Health and Safety Code (Section 7050.5), and California Government Code Section 27491. These regulations detail specific procedures to follow in the event of a discovery of human remains (i.e., work would be required to halt, and no soil would be exported off-site until a determination could be made via the County Coroner and other authorities as required).

Significance of Impact

No existing formal cemeteries or known burials are identified within the project site. In the event of an unanticipated discovery of human remains, the project would proceed in accordance with regulations. Therefore, impacts to human remains would be less than significant**.**

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

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5.10 HYDROLOGY

This section describes the existing hydrology conditions of the proposed Renzulli Estates Project (project) site, identifies associated regulatory requirements, and evaluates potential impacts related to the implementation of the project. The following discussion is based on the Storm Water Quality Management Plan, prepared by Hunsaker & Associates (October 2023) and included as Appendix I1; the Drainage Study, prepared by Hunsaker & Associates (February 2024) and included as Appendix I2; and the Geotechnical Investigation and subsequent memo, prepared by Advanced Geotechnical Solutions Inc. (March 2023) and included as Appendices E1 and E2.

5.10.1 EXISTING CONDITIONS

Existing Drainage Patterns

The surrounding area is largely characterized by residential development, with some open space to the west and Cypress Canyon Park located to the east. The project site itself is primarily characterized by largely undeveloped land on steep slopes and hillsides with both native vegetation communities and disturbed areas. Within the project site, there is one existing residence, several outbuildings, two associated sheds, and one large asphalt area located in the center of the site. Existing drainage patterns in the surrounding area include runoff from the project site, which flows from east to west and drains into an existing storm drain headwall under Cypress Valley Drive, located west of the project site. The project drainage area is bisected into northern and southern drainage areas by a ridgeline running through the center of the project site from the northwest to the southeast. The southern drainage area drains into the existing southeast storm drain at Cypress Valley Drive, while another small drainage area drains to the east of the project site and continues to gutter flow into the inlet at the Cypress Canyon Road and Cypress Canyon Park Drive intersection. The northern drainage area of the project site is divided into six sub-catch basins that drain into existing inlets and catch basins located at Cypress Canyon Road, Mundial Street, and other nearby basins. The existing project site flow rate is 82.54 to 135.78 cubic feet per second (Appendix I2~~1~~). The existing drainage pattern at the project site is shown in Figure 5.10-1, Existing Hydrologic Setting.

Groundwater

No groundwater was encountered during field investigations of the project site (Appendix E1 and Appendix E2). However, intermittent seepage was encountered near the contact between the undocumented canyon fill at the north-central portion of the project site and the documented fill soils placed during the development of the existing residence. No groundwater is expected on site except for the potential seepage at the contact between the fill and formational materials (Appendix E1 and Appendix E2). The project site is not located within a priority groundwater basin (DWR 2019).

Floodplains

According to Federal Emergency Management Agency Flood Insurance Rate Map No. 06073C1362G, the project site is not located with any flood hazard areas (100-year floodplain) (Appendix I2).

Water Basin The project site is located within the San Diego Water Basin. The region is within the southwest corner of California and is broken up into 11 hydrologic units and 54 hydrologic areas. The project is located in the Peñasquitos Hydrologic Unit. The San Diego Regional Water Quality Control Board Basin Plan identifies objectives and policies to maintain and protect water quality within the basin and designates beneficial uses for water (RWQCB 2021).

The project site is located within the Los Peñasquitos Watershed Management Area (WMA). The Los Peñasquitos WMA is 94 square acres and encompasses the drainage areas of Los Peñasquitos Creek, Carmel Creek, and Carroll Canyon Creek (Regional Water Management Group 2019). The Los Peñasquitos WMA consists of two hydrologic areas (HAs): Miramar Reservoir (906.10) and Poway (906.20). The Los Peñasquitos WMA contains one water storage facility, Lake Miramar, and one groundwater basin, the Poway Valley Basin. The project site is located within the Poway HA (906.20). The Poway HA is east of the Miramar Reservoir HA and is covered entirely by the upper portion of the Los Peñasquitos Creek sub-watershed (County of San Diego 2017). The majority of surface runoff in the Poway HA is eventually directed into Los Peñasquitos Creek by way of a number of smaller creeks and tributaries. Los Peñasquitos Creek then makes its way through the Los Peñasquitos Lagoon before being discharged into the Pacific Ocean.

5.10.2 REGULATORY FRAMEWORK

Federal

National Pollutant Discharge Elimination System Permit Program Phase I

In November 1990, under Phase I of the urban runoff management strategy, the U.S. Environmental Protection Agency published National Pollutant Discharge Elimination System (NPDES) permit application requirements for municipal, industrial, and construction discharges. The application requirements for municipalities were directed at those municipalities that own and operate separate storm drain systems service populations of 100,000 or more or that contribute significant pollutants to waters of the United States, and such agencies are required to obtain coverage under municipal stormwater NPDES permits.

Municipalities were required to develop and implement urban runoff management programs to reduce pollutants in urban runoff and stormwater discharges that were contributing a substantial pollutant load to their systems. Rather than establishing numeric effluent limits, the U.S.

Environmental Protection Agency established narrative effluent limits for urban runoff, including the requirement to implement appropriate best management practices (BMPs).

National Pollutant Discharge Elimination System Permit Program Phase II

The Phase II Final Rule, published in the Federal Register on December 8, 1999, required NPDES permit coverage for stormwater discharges from the following:

- Certain regulated small municipal separate storm sewer systems (MS4s)
- Construction activity disturbing between 1 and 6 acres of land (i.e., small construction activities)

In addition to expanding the NPDES program, the Phase II Final Rule included minor revisions for certain industrial facilities. As with Phase I, the Phase II program requires the development and implementation of stormwater management plans to reduce pollutant discharges.

State

National Pollutant Discharge Elimination System Permits

In California, the State Water Resources Control Board and its Regional Water Quality Control Boards administer the NPDES permit program. The NPDES permits cover all construction and subsequent drainage improvements that disturb 1 acre or more, industrial activities, and MS4s. Construction and industrial activities are typically regulated under statewide general permits that are issued by the State Water Resources Control Board, which also issued a statewide general small MS4 stormwater NPDES permit for public agencies that fall under the Phase II NPDES regulations.

The NPDES permit system was established in the Clean Water Act to regulate both point-source discharges (i.e., a municipal or industrial discharge at a specific location or pipe) and nonpoint-source discharges (i.e., diffused runoff of water from adjacent land uses) to surface waters of the United States. For point-source discharges, each NPDES permit contains limits on allowable concentrations and mass emission of pollutants contained in the discharge. For nonpoint-source discharges, the NPDES program establishes a comprehensive water quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. The NPDES program consists of characterizing receiving water quality, identifying harmful constituents, targeting potential sources of pollutants, and implementing a comprehensive stormwater management program.

The reduction of pollutants in urban stormwater discharge to the maximum extent practicable through the use of structural and nonstructural BMPs is one of the primary objectives of the water quality regulations for MS4s. BMPs typically used to manage runoff water quality include controlling

roadway and parking lot contaminants by installing filters with oil and grease absorbents at storm drain inlets, cleaning parking lots on a regular basis, incorporating peak-flow reduction and infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping, and implementing educational programs.

Local

Municipal Stormwater Permit

The City of San Diego (City) currently operates under the NPDES Municipal Stormwater Permit issued on January 24, 2007 (Permit Order No. R9-2007-0001), which requires that stormwater BMPs be incorporated into the permanent design of public and private development projects. On May 8, 2013, the San Diego Regional Water Quality Control Board approved a regional MS4 permit for San Diego, southern Orange, and southwestern Riverside Counties, which became effective on June 27, 2013. The region-wide NPDES permit (commonly referred to as the Regional MS4 Permit) sets the framework for responsible agencies to implement a collaborative watershed-based approach to restore and maintain the health of surface waters. The Regional MS4 Permit required development of Water Quality Improvement Plans that will allow watershed stakeholders to prioritize and address pollutants through an appropriate suite of BMPs in each watershed.

City Stormwater Runoff and Drainage Regulations

Drainage regulations are enforced under San Diego Municipal Code Sections 142.0201 through 142.0230 (Article 2: General Development Regulations, Division 2: Storm Water Runoff and Drainage Regulations) and Sections 143.0145 and 143.0146 (Article 3: Supplemental Development Regulations, Division 1: Environmentally Sensitive Lands Regulations). The primary purposes of drainage regulations are to regulate the development of, and impacts to, drainage facilities; to limit water quality impacts from development; to minimize hazards due to flooding while minimizing the need for construction of flood control facilities; to minimize impacts to environmentally sensitive lands; to implement the provisions of federal and state regulations; and to protect the public health, safety, and welfare. The drainage regulations apply to all development in the City, regardless of whether a permit or other approval is required.

City of San Diego Drainage Design Manual

The primary purpose of the City's Drainage Design Manual, dated January 2017, is to provide policies and procedures to secure standardization of drainage design throughout the City. The manual establishes design standards and design procedures for stormwater conveyance and hydrology analysis for flood management and water quality facilities in the City (City of San Diego 2017).

City of San Diego Grading Ordinance

San Diego Municipal Code Chapter 14, Article 2, Division 1 (Section 142.0101), addresses the City's Grading Regulations. The purpose of the regulations is to address slope stability, protection of property, erosion control, water quality, landform preservation, and paleontological resources preservation, as well as to protect the public health, safety, and welfare of persons, property, and the environment. The Grading Regulations require permittees provide adequate erosion control or drainage devices, debris basins, or other safety devices and take all safety precautions reasonably necessary to protect persons and property.

City of San Diego General Plan

The City General Plan provides a number of goals and policies related to hydrology and water quality concerns in the Public Facilities, Services, and Safety Element (City of San Diego 2022a) and the Conservation Element (City of San Diego 2008), as summarized below.

Public Facilities, Services, and Safety Element

This element includes a number of goals and policies related to the provision of adequate public facilities and services for existing and proposed development. For stormwater, these involve efforts to provide appropriately designed and sized infrastructure and ensure adequate conveyance capacity, protect water quality, and provide conformance with applicable regulatory standards (such as the NPDES) (City of San Diego 2022a).

Conservation Element

The Conservation Element provides a number of goals and policies related to preserving and protecting watersheds and natural drainage features, minimizing runoff and related pollutant generation during and after construction activities, and protecting drinking water resources (City of San Diego 2008).

5.10.3 IMPACT ANALYSIS

5.10.3.1 Issues 1 and 2: Drainage

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 volume?

Thresholds

The City's Significance Determination Thresholds (City of San Diego 2022b) identify potentially significant impacts related to runoff if a project would:

- Result in decreased aquifer recharge or result in extraction from an aquifer resulting in a net deficit in the aquifer volume or reduction in the local groundwater table;
- Grade, clear, or grub more than 1.0 acre of land, especially into slopes over a 25 percent grade and drain into a sensitive water body or stream, causing uncontrolled runoff that results in erosion and subsequent sedimentation of downstream water bodies; or
- Modify existing drainage patterns such that environmental resources, including biological communities or archaeological sites, would be adversely affected.

Impact Analysis

Aquifer and Groundwater Recharge

As discussed in Section 5.10.1, Existing Conditions, no groundwater was encountered during field investigations of the project site (Appendix E1 and Appendix E2). The existing developed area of the project site is approximately 1.06 acres, and the project proposes a development area of 21.58 acres, 10.46 of which would be impervious. Implementation of the project would result in an increase in impervious surfaces, resulting in approximately 25.8% of the project site being impervious (Appendix I2). Portions of the northern and southern portions of the project site would remain undeveloped and would intake stormwater to allow for groundwater recharge. The project would also include two proposed bioinfiltration basins as a part of the stormwater system that would allow for infiltration. In addition, the project would include landscaped areas throughout the project site. Existing drainage utilities are located within the surrounding residential development, which the project would connect to (Appendix I1). Further, the project site is not located within a priority groundwater basin. The Peñasquitos Hydrologic Unit (906.20) does not identify groundwater recharge as a beneficial use (RWQCB 2021). The project would not result in decreased aquifer recharge or result in extraction from an aquifer resulting in a net deficit in aquifer volume or reduction in the local groundwater table.

Runoff

The project would include the development of 112 residential units and associated amenities. The development of the project would result in the increase of impervious surfaces within the project site (including driveways, sidewalks, and roads).

The proposed drainage improvements include storm drains, curb inlets, and cleanouts along the proposed streets and parking spaces and would convey storm runoff into the two proposed biofiltration basins, located at the northeast and west portions of the project site (see Figure 3-8, Proposed Drainage Patterns, in Chapter 3, Project Description). The proposed design of the project would collect and convey runoff associated with the proposed slopes areas directly into existing storm drains located downstream and surrounding the project site. After the majority of the runoff is treated and detained by the proposed biofiltration basins, the outflow would converge with the bypass storm drain and discharge into the existing 24-inch storm drain within Mundial Street to the north of the project site and south into an underground storm drain located at the end of Cypress Valley Drive, adjacent to the site to the east.

At the northwest corner of the site, the project would generate runoff within a small section of the proposed road connecting to Cypress Canyon Road. This runoff would flow into the two existing concrete ditches located on both sides of the road. These existing ditches would accept runoff from the project and would discharge into two storm drain inlets on Cypress Canyon Road and Angelique Street. Therefore, the project does not propose a storm drain within this section of Cypress Canyon Road. Drainage patterns of undisturbed areas within the project site would be consistent with existing conditions.

Overall, the proposed project would decrease the predicted peak runoff from a 100-year runoff event, or Q100, flows by 36.91 cubic feet per second, with existing flows being 135.78 and proposed attenuated Q100 flows lowering to 99.87 cubic feet per second (Appendix I2~~1~~). Although the project would change the existing drainage patterns within the project site, proposed storm drains would be sized to accommodate the post-project peak-flow conditions. Further, small on-site redirection of flows would not alter general drainage patterns as on-site storm drain systems ultimately discharge to the same location downstream of the project. The changes in runoff would not result in changes to the downstream environmental conditions considering it would be directed into the City's storm drain system. In addition, as discussed in the Biological Resources Technical Report prepared for the project (Appendix D), the proposed basins would ensure that all runoff from the site passes through a natural filtration system prior to entering the existing Multi-Habitat Planning Area and the southern wetlands within the project site. Lastly, the project would be required to demonstrate compliance with the City's Multiple Species Conservation Program Land Use Adjacency Guidelines, which would provide a further reduction in indirect impacts to vegetation communities within the Multi-Habitat Planning Area, including prevention of toxic or harmful runoff (Appendix D).

The project site is not located within the 100-year floodplain (FEMA 2022). Thus, the project would not impose flood hazards due to development within a 100-year floodplain. Additionally, as stated above, flows would be directed to existing and proposed catch basins and ultimately discharge to the same location downstream of the project. Further, the project would decrease the quantity of

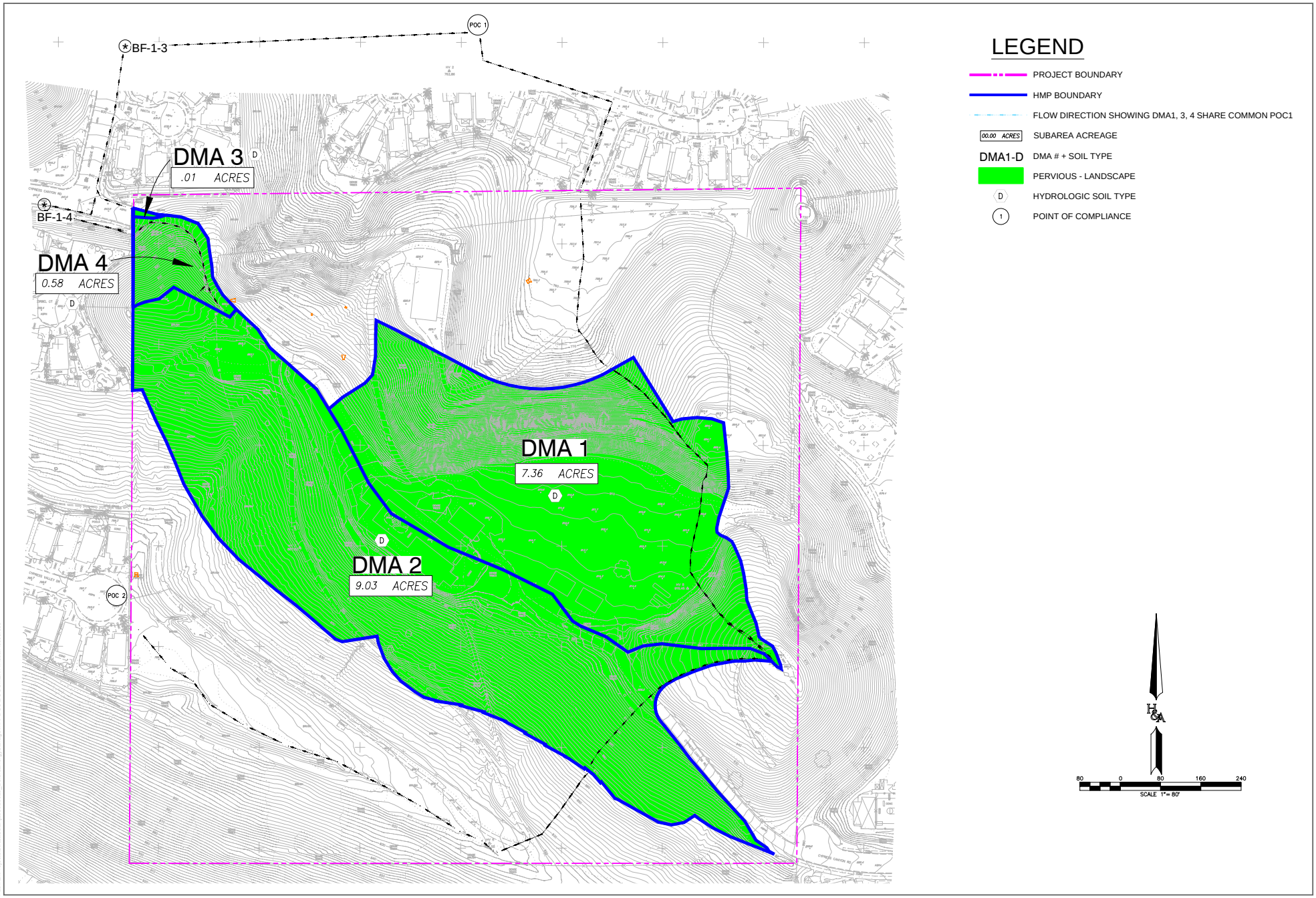
runoff on site, and the proposed storm drains would be sized to accommodate the post-project peak-flow conditions. The combination of basins would be sufficient to ensure the graded total peak 100-year flow rates for the proposed condition would be less than the maximum allowable peak flow rate. Thus, the project would not impose flood hazards due to changes in flow or velocity.

Significance of Impact

Although the project would result in an increase in impervious surfaces, the project would not result in increased runoff or have an adverse effect on drainage patterns. Impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.



SOURCE: Hunsaker & Associates 2020

FIGURE 5.10-1

Existing Hydrologic Setting

EIR for the Renzulli Estates Project, City of San Diego, California

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5.11 NOISE

This section describes the existing noise conditions of the proposed Renzulli Estates Project (project) site, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to the implementation of the project. The following discussion is based upon the noise analysis technical report prepared by Dudek (October 2023) and included as Appendix J.

5.11.1 EXISTING CONDITIONS

Existing Physical Conditions

Currently, the project site contains a large existing residence, several outbuildings and two associated sheds in the central area of the site. However, the remainder of the project site remains is undeveloped throughout. The project site is surrounded by existing residential development to the north, east, and west; small patches of undeveloped open space to the south and southeast; and Cypress Canyon Park further east.

Ambient Noise Conditions

Sound pressure level measurements were conducted near the project site on September 13, 2021, to quantify and characterize the existing outdoor ambient sound levels. Table 5.11-1 provides the location, date, and time period at which these baseline measurements were performed by an attending Dudek field investigator using a Rion-branded Model NL-52 sound level meter (SLM) equipped with a 0.5-inch, pre-polarized condenser microphone with pre-amplifier. The SLM meets the current American National Standards Institute standard for a Type 1 (Precision Grade) SLM. The accuracy of the SLM was verified using a field calibrator before and after the measurements, and the measurements were conducted with the microphone positioned approximately 5 feet above the ground.

Four short-term (ST) noise level measurement locations (ST1–ST4) that represent existing noise-sensitive receivers were selected on and near the project site. These locations are depicted as receivers ST1–ST4 in Figure 5.11-1. The measured equivalent sound levels (L_{eq}) and maximum sound levels are provided in Table 5.11-1. The primary noise sources at the sites identified in 5.11-1 consisted of traffic along adjacent roadways, the sounds of leaves rustling, and birdsong. As shown in Table 5.11-1, the measured sound pressure level ranged from approximately 76.3 A-weighted decibels (dBA) L_{eq} at ST1 to 41.2 dBA L_{eq} at ST2. The maximum sound level ranged from 46.9 dBA at ST2 to 76.3 dBA at ST1.

Table 5.11-1
Measured Baseline Outdoor Ambient Noise Levels

Site	Location/Address	Date/Time	L_{eq}	L_{max}
ST1	South of 11007 Elderwood Lane, San Diego, California 92131	09/13/2021, 11:10 a.m.–11:25 a.m.	63.9	76.3
ST2	South 11990 Cypress Valley Drive, San Diego, California 92131	09/13/2021, 12:20 p.m.–12:30 p.m.	41.2	46.9
ST3	Western cul-de-sac of Cypress Canon Road	09/13/2021, 12:50 p.m.–1:00 p.m.	44.4	53.5
ST4	Southern dead-end road of Mundial Street	09/13/2021, 12:25 p.m.–12:35 p.m.	46.0	52.8

Source: Appendix J.
Notes: L_{eq} = equivalent continuous sound level (time-averaged sound level); L_{max} = maximum sound level during the measurement interval; dBA = A-weighted decibels; ST = short-term noise measurement locations.

5.11.2 REGULATORY FRAMEWORK

Federal

Federal Transit Administration

In its Transit Noise and Vibration Impact Assessment guidance manual, the Federal Transit Administration (FTA) recommends a daytime construction noise level threshold of 80 dBA L_{eq} over an 8-hour period (FTA 2006) when detailed construction noise assessments are performed to evaluate potential impacts to community residences surrounding a project. Although this FTA guidance is not a regulation, it can serve as a quantified standard in the absence of such limits at the state and local jurisdictional levels.

State

California Code of Regulations, Title 24

Title 24 of the California Code of Regulations sets standards that new development in California must meet. According to Title 24, interior noise levels are not to exceed 45 dBA community noise equivalent level (CNEL) for new multifamily residences, hotels, and other attached residences.

Title 24 also requires that an interior acoustical study demonstrating that interior noise levels due to exterior sources will be less than or equal to 45 dBA CNEL be performed for affected multifamily structures and hotels that are exposed to exterior noise levels in excess of 60 dBA CNEL.

California Department of Health Services Guidelines

The California Department of Health Services has developed guidelines of community noise acceptability for use by local agencies (OPR 2003). Selected relevant levels are listed here:

- Below 60 dBA CNEL: normally acceptable for low-density residential use
- 50 to 70 dBA: CNEL conditionally acceptable for low-density residential use
- Below 65 dBA CNEL: normally acceptable for high-density residential use and transient lodging
- 60 to 70 dBA CNEL: conditionally acceptable for high-density residential, transient lodging, churches, educational, and medical facilities

The normally acceptable exterior noise level for transient lodging use is up to 65 dBA CNEL. Conditionally acceptable exterior noise levels range up to 70 dBA CNEL for transient lodging.

California Department of Transportation

In its Transportation and Construction Vibration Guidance Manual, Caltrans recommends a vibration velocity threshold of 0.2 inches per second (ips) peak particle velocity (PPV) (Caltrans 2020) for assessing "annoying" vibration level exposures from continuous sources such as roadway traffic to occupants of residential structures. Although this Caltrans guidance is not a regulation, it can serve as a quantified standard in the absence of such limits at the local jurisdictional level. Similarly, thresholds to assess building damage risk due to construction vibration vary with the type of structure and its fragility but tend to range between 0.2 ips and 0.3 ips PPV for typical residential structures (Caltrans 2020).

Local

City of San Diego Municipal Code 59.5.0401 (Noise Ordinance)

It shall be unlawful for any person to cause noise by any means to the extent that the 1-hour average sound level exceeds the applicable limit given in Table 5.11-2 at any location in the City of San Diego on or beyond the boundaries of the property on which the noise is produced. The noise subject to these limits is that part of the total noise at the specified location that is due solely to the action of said person.

Table 5.11-2
Applicable Noise Limits

Land Use	Time of Day	One-Hour Average Sound Level (dB)
Single-family residential	7:00 a.m. to 7:00 p.m.	50
	7:00 p.m. to 10:00 p.m.	45
	10:00 p.m. to 7:00 a.m.	40
Multifamily residential (up to a maximum density of 1/2,000)	7:00 a.m. to 7:00 p.m.	55
	7:00 p.m. to 10:00 p.m.	50
	10:00 p.m. to 7:00 a.m.	45
All other residential	7:00 a.m. to 7:00 p.m.	60
	7:00 p.m. to 10:00 p.m.	55
	10:00 p.m. to 7:00 a.m.	50
Commercial	7:00 a.m. to 7:00 p.m.	65
	7:00 p.m. to 10:00 p.m.	60
	10:00 p.m. to 7:00 a.m.	60
Industrial or agricultural	Any time	75

Source: Appendix J.
Note: dB = decibels.

City of San Diego Municipal Code 59.5.0404 (Noise Ordinance), Construction Noise

(a) It shall be unlawful for any person, between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code (SDMC), with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator. In granting such permit, the Administrator shall consider whether the construction noise in the vicinity of the proposed work site would be less objectionable at night than during the daytime because of different population densities or different neighboring activities; whether obstruction and interference with traffic particularly on streets of major importance, would be less objectionable at night than during the daytime; whether the type of work to be performed emits noises at such a low level as to not cause significant disturbances in the vicinity of the work site; the character and nature of the neighborhood of the proposed work site; whether great economic hardship would occur if the work were spread over a longer time; whether proposed night work is in the general public interest; and he shall prescribe such conditions, working times, types of construction equipment to be used, and permissible noise levels as he deems to be required in the public interest.

(b) Except as provided in subsection C. hereof, it shall be unlawful for any person, including the City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7:00 a.m. to 7:00 p.m.

(c) The provisions of subsection B. of this section shall not apply to construction equipment used in connection with emergency work, provided the Administrator is notified within 48 hours after commencement of work.

City of San Diego General Plan

The City's General Plan Noise Element identifies compatible exterior noise levels for various land use types (City of San Diego 2015). The maximum allowable noise exposure varies depending on the land use. The maximum acceptable exterior noise level for residential uses and other noise-sensitive uses (including kindergarten through 12th grade schools, libraries, hospitals, daycare facilities, hotels, motels) is 65 dBA CNEL. However, exterior noise levels are considered compatible up to 75 dBA CNEL at higher education institutions. Refer to Section 5.1, Land Use, for further information on the City's General Plan Noise Element. Table 5.1-1 reproduces Table NE-3 from the City's General Plan Noise Element.

5.11.3 IMPACT ANALYSIS

5.11.3.1 Issues 1 and 2: Ambient Noise Level

Issue 1: Would the project result or create a significant increase in the existing ambient noise levels?

Issue 2: Would the project result in exposure of people to noise levels which exceed the City's adopted noise ordinance or are incompatible with Table K-4?[1]

Thresholds

The City CEQA Significance Determination Thresholds (City of San Diego 2022) indicate the project would have a significant impact if it would:

- Result or create a significant increase in the existing ambient noise levels
- Exposure of people to noise levels which exceed the City's adopted noise ordinance or are incompatible with Table K-4

[1] Table K-4 has been superseded. The updated land use noise compatibility table is included as Table 5.1-1.

Noise from Adjacent Stationary Uses (Noise Generators)

As detailed in the Section 5.11.2, Regulatory Framework, the City's Noise Ordinance also limits property line noise levels for various land uses by time of day for noise generated by on-site sources associated with project operation (see the Table of Allowable Limits in Section 59.5.0401 of the SDMC). By way of illustration, the limit for single-family residential land uses is 50 dBA L_{eq} from 7:00 a.m. to 7:00 p.m., 45 dBA L_{eq} from 7:00 p.m. to 10:00 p.m., and 40 dBA L_{eq} from 10:00 p.m. to 7:00 a.m. A project that would generate noise levels at the property line that exceed the City's Noise Ordinance Standards is considered potentially significant (such as potentially a carwash or projects operating generators or noisy equipment). If a nonresidential use, such as commercial, industrial, or educational, is proposed to abut an existing residential use, the decibel (dB) level at the property line should be the arithmetic mean of the dB levels allowed for each use as set forth in SDMC Section 59.5.0401.

Temporary Construction Noise and Sound Level Limits

Temporary construction noise that exceeds 75 dBA L_{eq} at a residentially-zoned receptor would be considered significant. As detailed in the Section 5.11.2, Regulatory Framework, per SDMC Section 59.5.0404(c), construction noise levels measured at or beyond the property lines of any property zoned residential shall not exceed an average sound level greater than 75 dB L_{eq} during the 12-hour period from 7:00 a.m. to 7:00 p.m. In addition, construction activity is prohibited between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in SDMC Section 21.04, with the exception of Columbus Day and Washington's Birthday, or on Sundays, that would create disturbing, excessive, or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator, in conformance with SDMC Section 59.5.0404. Additionally, per the Significance Determination Thresholds (City of San Diego 2022), where temporary construction noise would substantially interfere with normal business communication, or affect sensitive receptors, such as day care facilities, a significant noise impact may be identified.

Construction Vibration

Guidance from Caltrans indicates that a groundborne vibration velocity level of 0.2 ips PPV received at a structure would be considered annoying by occupants within (Caltrans 2020). As for the receiving structure itself, aforementioned Caltrans guidance from Section 2 recommends that a maximum vibration level of 0.3 ips PPV from continuous or intermittent-type sources (e.g., conventional ongoing construction activity) would represent the threshold for building damage risk.

Impact Analysis

Short-Term Construction Noise

Construction noise associated with the project has been assessed herein with respect to the nearest existing residential receptors, at which the 75 dBA 12-hour L_{eq} threshold per SDMC Section 59.5.0404(c) would apply.

Construction of the project is anticipated to commence in October 2024 and would last approximately 53 months, ending in February 2029. While the anticipated start date may change, this would not alter the analysis since estimated durations would remain the same and, based on the history of regulations, air quality vehicle emission regulations would get stricter over time. The analysis contained herein is based on the following subset area schedule assumptions (duration of phases is approximate).

- Demolition - 2 months
- Site Preparation - 1 month
- Grading - 13 months
- Building Construction - 31 months
- Paving - 3.5 months
- Architectural Coating - 2.5 months

The majority of the phases listed above would occur concurrently and would not occur sequentially in isolation. The estimated construction duration was provided by the proposed project applicant.

The construction equipment mix used for estimating the construction noise impacts is based on information provided by the project applicant and is shown in Table 5.11-3.

Table 5.11-3
Construction Scenario Assumptions

	One-Way Vehicle Trips			Equipment		
Construction Phase	*Average Daily Worker Trips*	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Demolition	16	4	196	Concrete Industrial Saws	1	8
				Excavators	3	8

Table 5.11-3
Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
				Rubber Tired Dozers	2	8
Site Preparation	18	4	0	Rubber Tired Dozers	3	8
				Tractors/Loaders/ Backhoes	4	8
Grading	20	4	2,312	Excavators	2	8
				Graders	1	8
				Rubber Tired Dozers	1	8
				Scrapers	2	8
				Tractors/Loaders/ Backhoes	2	8
Building Construction	82	28	0	Cranes	1	7
				Forklifts	3	8
				Generator Sets	1	8
				Tractors/Loaders/ Backhoes	3	7
				Welders	1	8
Paving	16	0	0	Pavers	2	8
				Paving Equipment	2	8
				Rollers	2	8
Architectural Coating	104	0	0	Air Compressors	1	6

Source: Appendix J

For this analysis, it was assumed that heavy construction equipment would be operating 5 days per week (22 days per month) during project construction.

Construction noise and vibration are temporary phenomena. Construction noise and vibration levels vary from hour to hour and day to day, depending on the equipment in use, the operations performed, and the distance between the source and the receptor. Equipment that would be in use during construction would include, in part, graders, backhoes, rubber-tired dozers, loaders, cranes,

forklifts, pavers, rollers, and air compressors. The typical maximum noise levels for various pieces of construction equipment at a distance of 50 feet are presented in Table 5.11-4. Note that the equipment noise levels presented in Table 5.11-4 are maximum noise levels. Usually, construction equipment operates in alternating cycles of full power and low power, producing average noise levels over time that are less than the maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time.

Table 5.11-4
Typical Construction Equipment Maximum Noise Levels

Equipment Type	Typical Equipment (L_{max}, dBA at 50 Feet)
All Other Equipment > 5 HP	85
Backhoe	78
Compressor (air)	78
Concrete Saw	90
Crane	81
Dozer	82
Excavator	81
Front End Loader	79
Generator	72
Grader	85
Man Lift	75
Paver	77
Roller	80
Scraper	84
Tractor	84
Welder / Torch	73

Source: DOT 2006.
Note: L_{max} = maximum sound level; dBA = A-weighted decibels.

Aggregate noise emission from project construction activities, broken down by sequential phase, was predicted at two distances to the nearest existing noise-sensitive receptor: 1) from the nearest position of the construction site boundary (or where activity is likely to concentrate, such as a building façade) and 2) from the geographic center of the construction site or area of expected activity, which serves as the time-averaged location or geographic acoustical centroid of active construction equipment for the phase under study. The intent of the former distance is to help evaluate anticipated construction noise from a limited quantity of equipment or vehicle activity expected to be at the boundary for some period of time, which would be most appropriate for phases such as site preparation, grading, and paving. The latter distance is used in a manner similar to the general assessment technique as described in the FTA guidance for construction noise

assessment when the location of individual equipment for a given construction phase is uncertain over some extent of (or the entirety of) the construction site area. Because of this uncertainty, all the equipment for a construction phase is assumed to operate—on average—from the acoustical centroid. For each of the four successive proposed project buildout phases, Table 5.11-5 summarizes these two distances to the apparent closest noise-sensitive receptor for each of the six sequential construction activities phases. At the site boundary, this analysis assumes that up to only one piece of equipment of each listed type per phase would be involved in the construction activity for a limited portion of the 12-hour period. In other words, at such proximity, the operating equipment cannot "stack" or crowd the vicinity and still operate. For the acoustical centroid case, which intends to be a geographic average position for all equipment during the indicated phase, this analysis assumes that the equipment may be operating up to all 12 hours per day.

Table 5.11-5
Estimated Distances between Construction Activities and the Nearest Noise-sensitive Receptors

Construction Phase (and Equipment Types Involved)	Distance from Nearest Noise-Sensitive Receptor to Construction Site Boundary (Feet)	Distance from Nearest Noise-Sensitive Receptor to Acoustical Centroid of Site (Feet)
Demolition (concrete saw, excavator, dozer)	250	300
Site preparation (dozer, backhoe)	12.5[a]	300
Grading (excavator, grader, dozer, scraper, backhoe)	12.5[a]	300
Building construction (crane, man-lift, generator, welder, backhoe)	125[b]	300
Paving (paver, roller, other equipment)	50[c]	300
Architectural Coating (compressor)	125[b]	300

Notes:

[a] Distance to nearest existing home on Cypress Valley Drive.

[b] Distance to nearest home on Zirbel Court.

[c] Distance to nearest home on Angelique Street.

Source: Appendix J

A Microsoft Excel–based noise prediction model emulating and using reference data from the Federal Highway Administration Roadway Construction Noise Model (FHWA 2008) was used to estimate construction noise levels at the nearest occupied noise-sensitive land use. (Although the Roadway Construction Noise Model was funded and promulgated by the Federal Highway Administration, it is often used for non-roadway projects, because the same types of construction equipment used for roadway projects are often used for other types of construction.) Input variables

for the predictive modeling consist of the equipment type and number of each (e.g., two graders, a loader, a tractor), the duty cycle for each piece of equipment (e.g., percentage of time within a specific time period, such as an hour, when the equipment is expected to operate at full power or capacity and thus make noise at a level comparable to what is presented in Table 5.11-4), and the distance from the noise-sensitive receiver. The predictive model also considers how many hours that equipment may be on site and operating (or idling) within an established work shift (in this case, the allowable daytime construction hours of 7:00 a.m. to 7:00 p.m. Conservatively, no topographical or structural shielding was assumed in the modeling. The Roadway Construction Noise Model has default duty-cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty-cycle values were used for this noise analysis, which is detailed in Appendix J, and produce the predicted results displayed in Table 5.11-6.

Table 5.11-6
Predicted Construction Noise Levels per Activity Phase

Construction Phase (and Equipment Types Involved)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Construction Site Boundary (dBA)	8-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Acoustical Centroid of Site (dBA)
Demolition (concrete saw, excavator, dozer)	65	65
Site preparation (dozer, backhoe)	85	63
Grading (excavator, grader, dozer, scraper, backhoe)	89	65
Building construction (crane, man-lift, generator, welder, backhoe)	61	58
Paving (paver, roller, other equipment)	73	60
Architectural Coating (compressor)	61	52

Notes: L_{eq} = equivalent noise level; dBA = A-weighted decibels.
Source: Appendix J

As presented in Table 5.11-6, the estimated construction noise levels are predicted to be as high as 89 dBA L_{eq} over a 12-hour period at the nearest existing residences (as close as 12.5 feet away) when grading activities take place near the project boundaries. Note that these estimated noise levels at a source-to-receiver distance of 12.5 feet would only occur when noted pieces of heavy equipment would each operate for a cumulative period of one-and-a-half (1.5) hours a day. By way of example, a grader might make multiple passes on site that are this close to a receiver; but, for the remaining time during the day, the grader is sufficiently farther away, performing work at a more distant location, or simply not operating. For these instances when the operation of construction equipment and processes are sufficiently proximate to cause activity noise levels to exceed 75 dBA L_{eq}.

While typical construction noise would not exceed the aforementioned City's threshold, there is potential for noise to exceed the 75 dBA L_{eq} 12-hour City threshold at the nearest residential receiver on occasion.

Groundborne Vibration

Construction activities may expose persons to excessive groundborne vibration or groundborne noise, causing a potentially significant impact. Caltrans has collected groundborne vibration information related to construction activities (Caltrans 2020). Information from Caltrans indicates that continuous vibrations with a PPV of approximately 0.2 ips is considered "annoying." For context, heavier pieces of construction equipment, such as a bulldozer that may be expected on the project site, have peak particle velocities of approximately 0.089 ips or less at a reference distance of 25 feet (DOT 2006).

Groundborne vibration attenuates rapidly—even over short distances. When groundborne vibration encounters a building foundation, a coupling loss occurs depending on the mass and design. For typical wood-framed houses, like those near the proposed project, this coupling loss is 5 vibration velocity dB according to FTA guidance (FTA 2006). The attenuation of groundborne vibration as it propagates from source to receptor through intervening soils and rock strata can be estimated with expressions found in FTA and Caltrans guidance. By way of example, for a bulldozer operating on site and as close as the northern project boundary (that is 10 feet from the nearest receiving sensitive land use) the estimated vibration velocity level would be 0.19 ips and thus no greater than the annoyance threshold recommended by Caltrans.

Construction vibration, at sufficiently high levels, can also present a building damage risk. However, anticipated construction vibration associated with this proposed project would not yield levels that surpass this risk. Per Caltrans, the recommended PPV threshold for newer residential structures is 0.5 ips and 0.3 ips for older residential structures—both of which are less stringent than the aforementioned threshold to annoy occupants of such structures and not exceeded by the project construction activities.

Construction Noise Impacts to Biological Resources

Within the City of San Diego, the Multiple Species Conservation Program (MSCP) is implemented through the City of San Diego MSCP Subarea Plan (City of San Diego 1997). The MSCP established a Multi-Habitat Planning Area (MHPA) preserve system designed to conserve large blocks of interconnected habitat having high biological value. As stated in the MSCP (City of San Diego 1997):

> Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational

> areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.

As discussed in the Biological Technical Report prepared for the proposed project (Appendix D), construction of the project may produce noise at levels that could indirectly impact MSCP covered species and special-status species that have a moderate to high potential to forage, roost, and nest in the study area. Covered species with potential to occur in the project site include coastal California gnatcatcher (*Polioptila californica californica*) and Cooper's hawk (*Accipiter cooperii*).

No clearing, grubbing, grading, or other construction activities shall occur during the breeding season of the coastal California gnatcatcher (February 1 through September 15) until the appropriate species-specific MSCP Land Use Adjacency Guidelines conditions of project approval have been met to the satisfaction of the City Manager to ensure no impacts to these species would occur from project implementation. These conditions include focused protocol surveys for coastal California gnatcatcher within areas subject to noise levels exceeding 60 dBA hourly average. If coastal California gnatcatchers are present in these areas, then no clearing, grubbing, or grading of occupied California gnatcatcher habitat shall be permitted from February 1 through September 15. Additionally, during this time, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dBA hourly average, or noise attenuation measures shall be provided, along with a noise model provided to the City prior to construction activities. If noise-generating activities adjacent to suitable habitat within the MHPA cannot be avoided during the breeding season, to avoid indirect impacts to this species, focused survey measures would be adhered to, as described above, as conditions of project approval. Since focused surveys already conducted for this species were negative, no direct noise effects are expected to occur to the species from vegetation clearing and grading activities within the project impact footprint.

Once operational, the only potential long-term indirect impacts of the project are an increase in noise and human presence adjacent to the MHPA due to general human presence and common residential activities. It is assumed that any noise impacts would likely be intermittent and below the 60 dBA hourly threshold for impacts to special-status wildlife inhabiting adjacent vegetation and would not cause long-term adverse indirect impacts. The increase in human presence would also be limited to the boundaries of the development and the trail areas and no additional human access or encroachment into the native vegetation is expected; therefore, no long-term adverse indirect impacts are expected. The project would be required to demonstrate compliance with the City's MSCP Land Use Adjacency Guidelines, which would provide a further reduction in indirect impacts to

vegetation communities within the MHPA, including prevention of toxic or harmful runoff. Therefore, once project construction is complete, the project would not be expected to produce noise at levels that could indirectly impact MSCP covered and special-status species within the habitats adjacent to the project footprint.

Long-Term Operational Noise

On-Site Stationary Operations

The incorporation of new single-family homes attributed to the development of the project would add a variety of noise-producing mechanical equipment that include those presented and discussed in the following paragraphs. Most of these noise-producing equipment or sound sources would be considered stationary or limited in mobility to a defined area. Using a Microsoft Excel–based outdoor sound propagation prediction model, project-attributed operational noise at nearby community receptors was predicted using several assumptions:

- Treatment of exposed patio air-cooled condensing units as point-type sound emission sources; and,
- Point-source sound propagation (i.e., 6 dB per doubling of distance) that conservatively ignores acoustical absorption from atmospheric and ground surface effects.
- These condenser units would generally be installed near building exterior walls in private area "backyards" or external areas.
- Occlusion of direct sound paths between grade level sound sources and nearest neighboring community receptors near grade level is assumed to yield at least 10 dB noise reduction (includes sound diffraction and barrier effects (Beranek and Ver 1992) due to the assumed property line barriers and presence of new on-site structures).

Please see Appendix J for quantitative details of the below predictions.

Residential Unit Heating, Ventilation, and Air Conditioning Noise

For purposes of this analysis, each of the new occupied residential units would be expected to feature a split-system type air-conditioning unit, with an air-cooled refrigeration (2-ton capacity) condenser unit at grade level.

Assuming each condenser unit has a sound pressure level of 68 dBA at 3 feet based on available data from a likely manufacturer (Carrier 2012), the closest existing noise-sensitive residential receptor to the north of the project's northernmost unit would be approximately 40 horizontal feet to the nearest of these condenser units. The predicted sound emission level from the combination

of operating units from all 100 single-family homes and 12 multifamily rental units operating condenser units at off-site single-family receptors would not exceed 40 dBA L_{eq} and thus would be compliant with the City's nighttime threshold of 40 dBA hourly L_{eq}.

Significance of Impact

Construction

Short-Term Construction Noise

As discussed above, while typical construction noise would not exceed the aforementioned City's threshold, there is potential for noise to exceed the 75 dBA L_{eq} 12-hour City threshold at the nearest residential receiver on occasion. Thus, temporary construction-related noise impacts would be considered potentially significant**.**

Construction Noise Impacts to Biological Resources

As stated above, the project would be required to demonstrate compliance with the City's MSCP Land Use Adjacency Guidelines, which would provide a further reduction in indirect impacts to vegetation communities within the MHPA, including prevention of toxic or harmful runoff. Therefore, once project construction is complete, the project would not be expected to produce noise at levels that could indirectly impact MSCP covered and special-status species within the habitats adjacent to the project footprint. Impacts would be less than significant.

Groundborne Vibration

As stated above, for a bulldozer operating on site and as close as the northern project boundary (that is 10 feet from the nearest receiving sensitive land use) the estimated vibration velocity level would be 0.19 ips and thus no greater than the annoyance threshold recommended by Caltrans. Impacts would be less than significant.

Operational

On-Site Stationary Operations

The predicted sound emission level from the combination of operating units from all 100 single-family homes and 12 multifamily rental units operating condenser units at off-site single-family receptors would not exceed 40 dBA L_{eq} and thus be compliant with the City's nighttime threshold of 40 dBA hourly L_{eq}. Under such conditions, the operation of residential air-conditioning units would result in a less-than-significant operational heating, ventilation, and air conditioning noise impact.

Groundborne Vibration

Per Caltrans, the recommended PPV threshold for newer residential structures is 0.5 ips and 0.3 ips for older residential structures—both of which are less stringent that the aforementioned threshold to annoy occupants of such structures; thus, vibration damage risk to nearby structures is considered less than significant.

Mitigation Measures

The following mitigation measure would reduce potentially significant construction noise impacts:

MM-NOI-1 Prior to issuance of construction permits, including but not limited to, the first Grading Permit, Demolition Permits, and Building Permits by the City of San Diego (City), the Owner/Permittee shall prepare and submit a Construction Noise Management Plan (CNMP) to the City's Environmental Analysis Section of the Development Services Department for review and approval. Prior to the issuance of a Construction Permit, Construction Plans shall also include a note indicating that compliance with the CNMP is required and that outlines the requirements identified in the CNMP. The CNMP shall be prepared or reviewed by a Qualified Acoustician (defined as having a Bachelor of Science or higher degree from a qualified program in engineering, physics, or architecture offered by an accredited university or college, and 5 years of experience in noise control engineering and construction noise analysis; or current enrollment as a full Member or Board-certified Member in the Institute of Noise Control Engineering. In addition, a Qualified Acoustician must have demonstrated experience in preparing and implementing construction noise controls, sound abatement, and monitoring plans on construction projects; calculating construction noise levels; and designing and overseeing the implementation of construction noise abatement measures). The CNMP shall include the following:

a. A detailed construction schedule at daily (or weekly if activities during each day of the week are typical) resolution and correlating to areas or zones of on-site project construction activities and the anticipated equipment types and quantities involved. Information shall include expected hours of actual operation per day for each type of equipment per activity for the buildout phase, and the anticipated concurrent construction activities on site.

b. Review and revision (if needed) of construction noise level estimates based on the current construction schedule and equipment roster per "a." above and reflecting information from the latest project site plan of expected features and

work areas, to determine the anticipated need for construction noise level monitoring.

c. Identification of locations to monitor, if established per "b." above, attended by a Qualified Acoustician or another party under its supervision or direction, at which sample outdoor ambient noise levels will be measured and collected over a sufficient sample period and subsequently analyzed (i.e., compared with applicable time-dependent A-weighted decibel [dBA] thresholds) to ascertain compliance with the San Diego Municipal Code (SDMC) 59.5.0404(c) threshold of 75 dBA equivalent sound level (L_{eq}) over a consecutive 12-hour period during daytime hours (7:00 a.m. to 7:00 p.m.). Sampling shall be performed, at a minimum, on the first (or otherwise considered typical construction operations) day of each distinct construction phase (e.g., each of the seven listed phases in the Renzulli Environmental Impact Report (SCH 2022040125) Table 5.11-3).

d. If sample collected noise level data indicates that the 12-hour noise threshold has or will be exceeded, construction work shall be suspended (for the activity or phase of concern), and the Permittee shall implement measures as detailed or specified in the CNMP that demonstrate compliance with the SDMC 59.5.0404(c) threshold; these measures may include but are not limited to:

    i. Administrative controls (e.g., reduce operating time of equipment and/or prohibit usage of equipment type[s] within certain distances).

    ii. Engineering controls (upgrade noise controls, such as install better engine exhaust mufflers).

    iii. Installation of noise abatement on the site boundary fencing (or within, as practical and appropriate) in the form of sound blankets or comparable temporary barriers to occlude construction noise emission between the site (or specific equipment operation as the situation may define) and the noise-sensitive receptor(s) of concern.

The implemented measure(s) shall be reviewed or otherwise inspected and approved by the Qualified Acoustician (or another party under their supervision or direction) prior to the resumption of the construction activity or process that caused the measured noise concern or need for noise mitigation. Noise levels shall be re-measured after the installation of said measures to ascertain post-mitigation compliance with the noise threshold. As needed, this process shall be repeated and refined until noise level compliance is demonstrated and documented. A report of this implemented mitigation and its documented success to provide compliance with the SDMC 59.5.0404(c) threshold would be provided to Mitigation Monitoring Coordination.

e. The Permittee shall make available a telephone hotline posted on an 11×17 sign at the entrance of the construction site so that concerned neighbors in the community may call to report noise complaints. The CNMP shall include a process to investigate these complaints and, if determined to be valid, detail efforts to provide a timely resolution and response to the complainant, with a copy of the resolution provided to the Mitigation Monitoring Coordination.

Significance After Mitigation

MM NOI-1 requires the preparation of a CNMP that a outlines procedures for ensuring construction noise compliance with City standards. MM-NOI-1 requires noise control measures to be incorporated to ensure noise levels would be in compliance with SDMC 59.5.0404(c). Construction noise levels have the potential to exceed the SDMC where construction activity would be within 12.5 feet of the property line (see Figure 3-1, Site Plan, in Chapter 3, Project Description). This includes the westernmost proposed graded areas and the installation of drainage features between Zirbel Court and Cypress Valley Drive and the northernmost proposed lots at the newly developed cul-de-sac on Mundial Street. MM-NOI-1 provides a list of potential measures that may be utilized where noise levels have the potential to exceed the SDMC. As demonstrated in Appendix J, the application of temporary noise barriers has the ability to reduce noise levels by 14 dB, which would correspondingly reduce the predicted 89 dBA 12-hour Leq for the grading phase to 75 dBA Leq. Thus, with the implementation of MM-NOI-1, project construction noise would be compliant with the 75 dBA threshold, and construction noise impacts would be compliant with the 75 dBA threshold. Impacts would be less than significant with mitigation.

5.11.3.2 Issue 3: Transportation Noise Levels

Issue 3: Would the project result in exposure of people to current or future transportation noise levels which exceed standards established in the General Plan?

Thresholds

The City's Significance Determination Thresholds (City of San Diego 2022) identify potentially significant impacts related to future transportation noise levels if a project would:

- Increase transportation noise by 3 dB and the noise levels exceed the City of San Diego Land Use – Noise Compatibility Guidelines (see Environmental Impact Report Table 5.1-1).

As shown in Table 5.1-1, the noise level at single- and multifamily residences should not exceed 60 dBA and parks should not exceed 70 without the incorporation of mitigation. A significant permanent increase is defined as a direct project-related permanent ambient increase of 3 dBA or

greater, where exterior noise levels would already exceed the City's significance thresholds (City of San Diego 2022). An increase of 3 dBA is perceived by the human ear as a barely perceptible increase.

Impact Analysis

The project would result in the creation of additional vehicle trips on local arterial roadways (i.e., Cypress Canyon Road and Cypress Canyon Park Drive), which could result in increased traffic noise levels at adjacent noise-sensitive land uses. Appendix C of Appendix J includes traffic noise modeling input and output, which contains a spreadsheet with traffic volume data (average daily traffic) for Cypress Canyon Road and surrounding arterial roadways. As stated in Appendix J, the project would create additional traffic along Cypress Canyon Road, which according to the Traffic Impact Assessment Local Mobility Analysis prepared for the project (see Appendix B2) would add 1,096 average daily trips to the segment of Cypress Canyon Road and adjacent roadways surrounding the project site.

Potential noise effects from vehicular traffic were assessed using the Federal Highway Administration's Traffic Noise Model version 2.5 (FHWA 2004). Information used in the model included the roadway geometry, posted traffic speeds, and traffic volumes for the following scenarios: existing (year 2021), existing plus project, opening year (year 2025, opening year plus project, future (2050), and future plus project. Noise levels were modeled at representative noise-sensitive receivers ST1 through ST4, as shown in Figure 5.11-1.

The City's Significance Determination Thresholds establishes a policy for exterior sensitive areas to be protected from high noise levels in accordance with the General Plan Noise Element and sets 60 dBA CNEL as conditionally compatible for the outdoor areas and 45 dBA CNEL for interior areas as the normally acceptable levels for residential uses. Existing ambient noise levels from traffic currently exceed 65 dBA CNEL. In accordance with the City's CEQA Significance Determination Thresholds (City of San Diego 2022), if a project is currently at or exceeds the land use compatibility thresholds, and noise levels would result in a less than a 3 dB increase, then the impact is not considered significant. An increase or decrease in noise level of at least 3 dB is required before any noticeable change in community response would be expected (Caltrans 2013). The receivers were modeled to be 5 feet above the local ground elevation to correlate with typical human hearing. The noise model results are summarized in Table 5.11-7.

Table 5.11-7
Roadway Traffic Noise Modeling Results

Modeled Receiver Tag (Location Description)	Existing (2021)		Near-term (2022)		Buildout (2050)		Maximum Project-Related Noise Level Increase* (dB)
	Existing Noise Level (dBA CNEL)	*Existing Plus Project Noise Level (dBA CNEL)*	*Near-term Noise Level (dBA CNEL)*	*Near-term Plus Project Noise Level (dBA CNEL)*	*Buildout Noise Level (dBA CNEL)*	*Buildout Plus Project Noise Level (dBA CNEL)*	
ST1	67.0	67.0	67.2	67.2	68.2	68.2	0.0
ST2	41.0	41.1	41.3	41.5	42.2	42.5	0.3
ST3	51.0	53.3	55.9	56.3	55.3	56.3	2.3
ST4	40.8	41.1	40.9	41.1	41.8	42.0	0.3

Notes: * among the three sets of prediction scenarios presented; dBA = A-weighted decibel; CNEL = Community Noise Equivalent Level; dB = decibel.
Source: Appendix J

Table 5.11-7 shows that at all four listed representative receivers, the addition of project traffic to the roadway network would result in a CNEL increase of less than 3 dB, which is below the discernible level of change for the average healthy human ear. Given the noise levels at ST3, the traffic noise levels generated at the nearby Cypress Canyon Park would also be less than 3 dB. Transportation noise changes that result from the project would not be perceptible by people.

Significance of Impact

As shown in Table 5.11-7, all four listed representative receivers, with the addition of project traffic to the roadway network would result in a CNEL increase of less than 3 dB, which is below the discernible level of change for the average healthy human ear. Thus, a less-than-significant impact would occur due to project-related off-site traffic noise increases affecting existing residences in the vicinity.

Mitigation Measures

As impacts would be less than significant, no mitigation is required.

5.11.3.3 Issue 4: Airports

Issue 4: Would the project result in land uses which are not compatible with aircraft noise levels as defined by an adopted airport Comprehensive Land Use Plan?

Thresholds

The City's Significance Determination Thresholds (City of San Diego 2022) identify potentially significant impacts related to land uses not compatible with aircraft noise levels if a project:

- Is located within the Airport Environs Overlay Zone (AEOZ) as defined in Chapter 13, Article 2, Division 3 of the SDMC, the potential exterior noise impacts from aircraft noise would not constitute a significant environmental impact.

However, interior noise impacts would be regulated by the requirement for residential development within the AEOZ to reduce interior noise levels attributable to airport noise to 45 dB CNEL. Interior noise levels for new construction of multifamily units are addressed by the Building Development Review Division of the City's Development Services Department and do not need to be mitigated through conditions in the environment report, but the Building Development Review Division requirements should be noted. The Building Development Review Division requires additional insulation and upgraded building materials so that interior noise levels do not exceed 45 dBA CNEL. The requirements for an acoustical testing are defined in the SDMC, Chapter 13, Article 2, Division 3, Section 132.0308, Acoustical Testing of Interior Noise Levels. An acoustical analysis would be implemented as part of project design, PDF-NOS-1. Requirements for noise studies are found in the SDMC at Chapter 13, Article 2, Division 3, Section 132.0308. This section of the SDMC applies to "development" as defined at Section 113.0103 to include "constructing, reconstructing, converting, establishing, altering, maintaining, relocating, demolishing, using, or enlarging any building, structure, improvement, lot, or premises." Remodels and additions to single-family and multifamily residences subject to airport noise levels above 65 dB (A) CNEL ordinarily would not be considered a significant issue and a noise study would not be required for the purposes of CEQA analysis. However, new construction of hospitals, schools, day care centers, or other sensitive uses subject to airport noise levels in excess of 65 dBA CNEL would be considered a significant issue, and a noise study would be required that could recommend measures to mitigate potential noise impacts to a level below significance.

Impact Analysis

The project site is not located within 2 miles of any public airport, nor is it located within the boundaries of any airport land use plans. The nearest airport is Marine Corps Air Station Miramar, located approximately 4 miles southwest of the project site. Additionally, the project site is not

located within any Marine Corps Air Station Miramar Air Installations Compatible Use Zones (Marine Corps Air Station Miramar 2020).

Significance of Impact

The site is not located within any Marine Corps Air Station Miramar Air Installations Compatible Use Zones (Marine Corps Air Station Miramar 2020); no impact would occur.

Mitigation Measures

As there would be no impact, no mitigation is required.



SOURCE: SANGIS 2017

0 150 300 Feet

FIGURE 5.11-1

Noise Measurement Locations

EIR for the Renzulli Estates Project, City of San Diego, California

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5.12 PALEONTOLOGICAL RESOURCES

This section describes the existing paleontological resources conditions of the proposed Renzulli Estates Project (project) site, identifies associated regulatory requirements, and evaluates potential impacts related to the implementation of the project. The following discussion is based upon the paleontological resources review memorandum prepared by Dudek (December 2021), included as Appendix K of this environmental impact report (EIR), and the geotechnical investigation and associated memo prepared by Advanced Geotechnical Solutions Inc. (March 2023), included as Appendices E1 and E2 of this EIR.

5.12.1 EXISTING CONDITIONS

Existing Physical Conditions

The project site includes a large existing residence, several outbuildings, and two associated sheds. There is a paved area in the center of the project site surrounded by undeveloped areas and existing surrounding residential development. The Multi-Habitat Planning Area, the hardline preserve developed by the City of San Diego (City), covers most of the project site.

Geologic Units Underlying the Project Area

Topographically, the project site consists of gently to moderately sloping terrain. According to the project geotechnical report (Appendix E1 and Appendix E2) and as summarized in EIR Section 5.6.1, the project site is underlain by Tertiary-aged sedimentary bedrock of the Poway Group (e.g., Pomerado Conglomerate, Mission Valley Formation, and Stadium Conglomerate) and associated residual soils, questionable landslide, artificial fill, slope wash, colluvium, and alluvium. Published geological mapping by Kennedy (1975) and Kennedy and Tan (2008) shows that the Friars Formation is mapped in nearby Beeler Canyon. However, the paleontological records search results received from the San Diego Natural History Museum (SDNHM) indicate that portions or entire areas mapped as the Mission Valley Formation locally may represent the upper tongue of the Friars Formation, while areas mapped as the Stadium Conglomerate may represent the conglomerate tongue of the Friars Formation (Appendix E1, Appendix E2, and Appendix K). The listed geologic units and their paleontological sensitivity are summarized below.

Artificial Fill

According to the project geotechnical investigation, the project site is underlain by variable thicknesses of artificial fill, up to a depth of 98 feet below the ground surface (Appendix E1 and Appendix E2). Any fossils present within artificial fill are not in situ; therefore, artificial fill has low paleontological resource sensitivity. However, within the project site, the artificial fill is underlain by

geological formations with high paleontological resource sensitivity (e.g., Eocene bedrock of the Poway Group).

Questionable Landslide Deposits

According to the project geotechnical investigation, a possible landslide deposit was discovered in the northwest portion of the project site. Landslide deposits remove fossils from their original place of deposition, thus removing the stratigraphic context of the fossil. Therefore, landslide deposits have low paleontological resource sensitivity but are oftentimes underlain by geological units with high paleontological resource sensitivity (e.g., Eocene bedrock of the Poway Group).

Quaternary Alluvium (Qal), Colluvium (Qc), and Topsoil

The project site is underlain at the surface by recent topsoil and colluvium and late Pleistocene- to Holocene-age young alluvial flood plain deposits. Holocene age, or recent (less than approximately 11,700 years ago) topsoil and alluvial and colluvial deposits have low paleontological resource sensitivity and do not require monitoring. However, these deposits commonly overlie geological units of high paleontological potential (e.g., the Mission Valley and Friars formations and the Pomerado and Stadium Conglomerate—see below) that could be impacted by construction where the contact is relatively shallow (Appendix K).

Pomerado Conglomerate (Tp)

Localities from the Pomerado Conglomerate range in age from middle to late Eocene (approximately 37–42 million years ago) and consist of fluvial (river-laid) and nearshore marine deposits that underlie the central portion of the project area. The Pomerado Conglomerate has high paleontological resource sensitivity (Appendix K).

Mission Valley Formation (Tmv)

The middle Eocene Mission Valley Formation (approximately 43 million years ago) consists of marine and fluvial deposits that underlie the Pomerado Conglomerate locally and may represent, at least in part, the upper tongue of the Friars Formation. The Mission Valley Formation has high paleontological resource sensitivity (Appendix K).

Stadium Conglomerate (Tst)

According to the geotechnical investigation for the project, the Stadium Conglomerate was encountered underlying 98 feet of artificial fill in one of the borings (Appendix E1 and Appendix E2). The fluvial/deltaic Stadium Conglomerate was deposited approximately 43 to 45 million years ago

and has produced fossil tapirs, rhinoceros, primates, and small mammals. The Stadium Conglomerate has high paleontological resource sensitivity.

Friars Formation (Tf)

According to the SDNHM records search results, the Friars Formation underlies the Pomerado Conglomerate and/or Mission Valley Formation within the project site, and the entirety or portions of the Mission Valley Formation mapped within the project site may represent the upper portion of the Friars Formation (Appendix K). In addition, the SDNHM indicated the Stadium Conglomerate may actually be the conglomerate facies of the Friars Formation (Appendix K). The majority of the fossil localities in this area are from the middle Eocene Friars Formation (approximately 46–47 million years ago), which consist of fluvial deposits that stratigraphically underlie the Mission Valley Formation and/or the Pomerado Conglomerate in the project area. The Friars Formation has high paleontological resources sensitivity (Appendix K).

Fossil Localities

A review of published geological maps and a site-specific geotechnical investigation report (Appendix E1 and Appendix E2) covering the project site and surrounding area were conducted to determine the specific geologic units underlying the project site. In addition, a search of the paleontological collection records housed at the SDNHM was conducted in order to determine if any documented fossil collection localities occur at the project site or within the immediate surrounding area.

A total of 24 fossil localities have been documented by the SDNHM within a 1-mile radius of the project site. All of these localities were discovered within the Eocene Pomerado Conglomerate, Mission Valley Formation, and Friars Formation, which underlies the project site. From the Eocene Pomerado Conglomerate, large, composite assemblage, including SDNHM localities 855, 874, 927, 949, and 951, yielded invertebrates (e.g., marine snails and clams) and vertebrates (e.g., reptiles and mammals). The SDNHM has five fossil localities from the Mission Valley Formation within a 1-mile radius of the project area. These localities include fossil invertebrates (e.g., land snails and freshwater clams), vertebrates (e.g., birds, reptiles, and mammals), and trace fossils (e.g., coprolites). The SDNHM has 14 fossil localities from the Friars Formation within a 1-mile radius of the project area. These localities produced land snails, birds, reptiles, and mammals (e.g., small opossums, pantotheres, insectivores, bats, primates, rodents, perissodactyls, and artiodactyls).

5.12.2 REGULATORY FRAMEWORK

Federal

The Paleontological Resources Preservation Act requires the secretaries of the Interior and Agriculture to manage and protect paleontological resources on federal land using scientific principles and expertise. The Omnibus Public Lands Act-Paleontological Resources Preservation (OPLA-PRP) includes specific provisions addressing the management of these resources by the Bureau of Land Management, the National Park Service, the Bureau of Reclamation, the U.S. Fish and Wildlife Service, all of the Department of the Interior, and the U.S. Forest Service of the Department of Agriculture.

The OPLA-PRP affirms the authority for many of the policies that the federal land-managing agencies already have in place for the management of paleontological resources, such as issuing permits for collecting paleontological resources, curation of paleontological resources, and confidentiality of locality data. The OPLA-PRP only applies to federal lands and does not affect private lands. It provides authority for the protection of paleontological resources on federal lands, including criminal and civil penalties for fossil theft and vandalism. As directed by the OPLA-PRP, the federal agencies are in the process of developing regulations, establishing public awareness and education programs, and inventorying and monitoring federal lands.

State

The California Environmental Quality Act (CEQA) Guidelines require that all private and public activities not specifically exempted be evaluated against the potential for environmental damage, including effects to paleontological resources. Paleontological resources are recognized as part of the environment under the CEQA Guidelines.

Local

San Diego Municipal Code – Paleontological Resources Requirements for Grading Activities

Chapter 14, Article 2, Division 1 of the San Diego Municipal Code (SDMC) was updated in March 2018 to include the following for paleontological resources:

Section 142.0151: Paleontological Resources Requirements for Grading Activities

a) Paleontological resources monitoring shall be required in accordance with the General Grading Guidelines for Paleontological Resources in the Land Development Manual for any of the following:

(1) Grading that involves 1,000 cubic yards or greater, and 10 feet or greater in depth, in a High Resource Potential Geologic Deposit/Formation/Rock Unit; or

(2) Grading that involves 2,000 cubic yards or greater, and 10 feet or greater in depth, in Moderate Resource Potential Geologic Deposit/Formation/Rock Unit; or

(3) Grading on a fossil recovery site or within 100 feet of the mapped location of a fossil recovery site.

b) If paleontological resources, as defined in the General Grading Guidelines for Paleontological Resources, are discovered during grading, notwithstanding [SDMC] Section 142.0151(a), all grading in the area of discovery shall cease until a qualified paleontological monitor has observed the discovery, and the discovery has been recovered in accordance with the General Grading Guidelines for Paleontological Resources.

City of San Diego Paleontology Guidelines

Since it is the underlying formation and geologic rock units that contain the fossil remains, resource sensitivity/potential levels are rated for individual geologic formations. The resource sensitivity levels and potential ratings are adapted from the resource sensitivity levels and potential ratings described by the City in Appendix P of the Land Development Manual (City of San Diego 2016).

5.12.3 IMPACT ANALYSIS

5.12.3.1 Issues 1 and 2: Excavation in High/Moderate Resource Potential Geologic Deposit/Formation/Rock Unit

Issue 1: Would the proposal require over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit?

Issue 2: Would the proposal require over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?

Thresholds

According to the City's Significance Determination Thresholds (City of San Diego 2022), the assessment of paleontological resource sensitivity for surficial and geologic units is based on the following designations:

- **High Sensitivity:** These formations are known to consist of geological deposits, formations, and rock units such as Delmar Formation (Td), Friars Formation (Tf), Lindavista Formation (Qln, QLB) occurring in Mira Mesa/Tierrasanta, Lusardi Formation (Kl) occurring within Black Mountain Ranch/Lusardi Canyon Poway/Rancho Santa Fe, Mission Valley Formation (TMV), Mt.

Soledad Formation (Tm, Tmss, Tmsc) occurring in Rose Canyon, Otay Formation (To), Point Loma Formation (Kp), Pomerado Conglomerate (Tp) within Scripps Ranch/Tierrasanta, San Diego Formation (Qsd), Scripps Formation (Tsd), Stadium Conglomerate (Tst), Sweetwater Formation, and Torrey Sandstone (Tf) located within Black Mountain Ranch/Carmel Valley. Monitoring is required for grading that is greater than 1,000 cubic yards and depths that are 10 feet or greater.

- **Moderate Sensitivity:** Moderate sensitivity is assigned to geological deposits, formations, and rock units consisting of Cabrillo Formation (KCS), Lindavista Formation (Qln, QLB), Lusardi Formation (Kl), Mt. Soledad Formation (Tm, Tmss, Tmsc), Pomerado Conglomerate (Tp), River/Stream Terrace Deposits (Qt) occurring in South Eastern/Chollas Valley/Fairbanks Ranch/Skyline/Paradise Hills/Otay Mesa and Nestor/San Ysidro, and Santiago Peak Volcanics (Jsp) occurring in Black Mountain Ranch/La Jolla Valley and Fairbanks Ranch/Mira Mesa/Peñasquitos. Monitoring is required for grading that is over 2,000 cubic yards and depths that are 10 feet or greater.
- **Low Sensitivity:** Low sensitivity is assigned to geologic or surficial formation/materials that consist of Alluvium (Qsw, Qal, or Qls), River/Stream Terrace Deposits (Qt), and Torrey Sandstone (Tf). No monitoring is required in areas with low sensitivity.
- **Zero Sensitivity:** These formations consist of volcanic or plutonic igneous rocks with a molten origin (such as Granite/Plutonic [Kg] and Santiago Peak Volcanics [Jsp]). No monitoring is required in areas with zero sensitivity.

The City assesses potential impacts to moderate and high sensitivity geologic formations as follows:

- Would the project require over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit?
- Would the project require over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?

Impact Analysis

The project site is underlain by three formations with high-resource potential (Pomerado Conglomerate, Mission Valley Formation, and Friars Formation) for the occurrence of sensitive paleontological resources. The project would require the excavation of approximately 564,798 cubic yards of soil to a maximum cut depth of 100 feet (Appendix E1 and Appendix E2), thereby exceeding the excavation parameters of the threshold. High-sensitivity formations would be encountered at the surface in some areas of the project site, with the potential for impacting the Pomerado Conglomerate, Mission Valley Formation, and Friars Formation. Given the proximity of past fossil discoveries in the area, the underlying paleontologically sensitive deposits, and the relatively deep

construction excavation planned, the project site has the potential to yield scientifically significant paleontological resources. Because the project's grading exceeds the CEQA Significance Determination Thresholds, the project is subject to the grading ordinance (SDMC Section 142.0151) and the requirement for paleontological monitoring, which would be made a condition of approval. Additionally, the project would be required to comply with the City's Paleontological Guidelines identified in Appendix P of the Land Development Manual.

Significance of Impact

The project would comply with the City's SDMC and associated Paleontological Guidelines of the Land Development Manual, and impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation is required.

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5.13 POPULATION AND HOUSING

This section describes the existing population and housing conditions of the proposed Renzulli Estates Project (project) site, identifies associated regulatory requirements, and evaluates potential impacts related to the implementation of the project.

5.13.1 EXISTING CONDITIONS

Existing Physical Conditions

Currently, the project site includes a large existing residence, several outbuildings, and two associated sheds, which are in the center of the project site. The structures are accessible via the segment of Cypress Canyon Road that connects to Cypress Canyon Park Drive to the southeast. Additionally, in the center of the site is a cleared area that has been paved. However, much of the project site remains undeveloped. The Multi-Habitat Planning Area, the hardline preserve developed by the City of San Diego (City), covers most of the project site.

Surrounding land uses include single-family residential development in all directions. Open space park land uses and recreational uses are intermixed throughout the single-family residential developments that surround the project site. Recreational land uses surrounding the site include Cypress Canyon Park (located directly east of the project site) and Scripps Ranch Community Park (located west of the project site).

Site Planning

The project site is currently designated Park, Open Space, and Recreation and Residential in the City's General Plan (City of San Diego 2021a). The project site is currently designated as Residential and Open Space as identified within the Scripps Miramar Ranch Community Plan (Community Plan), with a density of 3–5 dwelling units per acre (du/ac) and a maximum of 45 units, resulting in a density of 1.1 du/ac (Scripps Miramar Ranch Planning Committee et al. 2018). The project site is zoned as Agricultural–Residential (AR)-1-1 (City of San Diego 2014). Permitted uses within the AR-1-1 zone include the development of single-dwelling-unit homes at a required minimum of 10-acre lots.

Regional and local population, housing, and employment numbers are discussed in conjunction with applicable plans in Section 5.13.2, Regulatory Framework.

5.13.2 REGULATORY FRAMEWORK

State

California Planning and Zoning Law

The legal framework within which California counties and cities exercise local planning and land use functions is provided in the California Planning and Zoning Law (Sections 65000 through 66499.58 of the California Government Code). Under that law, each county and city must adopt a comprehensive, long-term general plan. The law gives counties and cities wide latitude in how a jurisdiction may create a general plan, but there are fundamental requirements that must be met. The requirements include seven mandatory elements described in the California Government Code. Each element must contain text and descriptions setting forth objectives, principles, standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and implementation measures.

Once the general plan of a county or city is adopted, it should be construed as a dynamic document, for which adaptability is a key component. Each jurisdiction frequently reviews its general plan for consistency and to ensure it addresses growth-related issues in a comprehensive manner. State law allows up to four general plan amendments per general plan element per year.

Senate Bill 375

Senate Bill 375 (codified in the California Government Code and California Public Resources Code) took effect in 2008 and provides a new planning process to coordinate land use planning, regional transportation plans (RTPs), and funding priorities in order to help California meet the greenhouse gas reduction goals established in Assembly Bill 32. Senate Bill 375 requires metropolitan planning organizations to incorporate sustainable communities strategies (SCSs) in their RTPs to achieve greenhouse gas emissions reduction targets by reducing vehicle miles traveled from light-duty vehicles through the development of more compact, complete, and efficient communities.

Regional Housing Needs Assessment

A regional housing needs assessment (RHNA) is mandated by state housing law as part of the periodic process of updating local housing elements of the general plan. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods.

Communities use the RHNA in land use planning, in prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment, and household growth. The RHNA does not necessarily encourage or promote growth

but rather allows communities to anticipate growth so that collectively, the region and subregion can grow in ways that enhance quality of life, improve access to jobs, promote transportation mobility, and address social equity and fair share housing needs.

Local

San Diego Association of Governments

The San Diego Association of Governments (SANDAG) is a public agency, composed of 18 cities and the County of San Diego, which builds strategic plans guiding the San Diego region in land use, growth, economics, and the environment. SANDAG also provides population and housing estimates for the region, which are based, in part, on local jurisdictional planning data, and inform regional planning.

The SANDAG Regional Comprehensive Plan, adopted in 2004, provides a long-term planning framework for the San Diego region (SANDAG 2015). The Regional Comprehensive Plan identified smart growth and sustainable development as important strategies to direct the region's future growth toward compact, mixed-use development in urbanized communities that already have existing and planned infrastructure, and then toward connecting those communities with a variety of transportation choices.

In 2011, SANDAG approved the 2050 RTP/SCS. This approval marked the first time SANDAG's RTP included an SCS, consistent with the Sustainable Communities and Climate Protection Act of 2008, also known as Senate Bill 375. This RTP/SCS provided a blueprint to improve mobility, preserve open space, and create communities, all with transportation choices to reduce greenhouse gas emissions and meet specific targets set by the California Air Resources Board as required by the 2008 Sustainable Communities Act (SANDAG 2015).

SANDAG is required by law to update its RTP every 4 years. In December 2021, SANDAG adopted the latest update to its RTP/SCS. SANDAG's 2021 RTP/SCS, known as San Diego Forward (SANDAG 2021): The Regional Plan (Regional Plan), integrates the elements of the prior Regional Comprehensive Plan and combines those elements with the Regional Plan.

The Regional Plan updates growth forecasts and is based on the most recent planning assumptions considering currently adopted land use plans, including the City's General Plan and other factors from the cities in the region and the county. SANDAG's Regional Plan will change in response to the ongoing land use planning of the City and other jurisdictions. For example, the City's General Plan and other local general plans may change based on general plan amendments initiated by the jurisdiction or landowner applicants. The general plan amendments may result in increases in development densities due to amendments of regional category designations or zoning

classifications. Accordingly, land use planning is not static, hence the need to update the RTP/SCS every 4 years. The latest forecasts from the SANDAG RTP/SCS of future development in the San Diego region must be coordinated closely with each jurisdiction's ongoing land use planning.

Regional Growth Forecast

SANDAG estimates future population, housing, land use, and economic growth throughout San Diego County and its cities, including the City. On October 13, 2013, SANDAG accepted the Series 13: 2050 Regional Growth Forecast, the most recent growth forecast for the region. This forecast serves as the foundation for the Regional Plan and other planning documents across the region. SANDAG's growth projections for the region, the City, and the Community Plan Area are outlined in Table 5.13-1. The 2050 Regional Growth Forecast is not intended to be an exact formula to determine growth in the region and comprising jurisdictions; rather, it should be utilized as a starting point for regional planning.

Table 5.13-1
Forecasted Growth for the San Diego Region, City of San Diego, and Scripps Miramar Ranch Community Plan Area

Jurisdiction/Area	Year				Change 2012–2050	
	2012	*2020*	*2035*	*2050*	*Numeric*	*Percent*
Population						
San Diego (Region)	3,143,429	3,435,713	3,853,698	4,086,759	925,330	29
City of San Diego	1,321,315	1,453,267	1,665,609	1,777,936	456,621	35
Scripps Miramar Ranch Community Plan Area	19,686	20,455	20,935	20,891	1,205	6
Housing						
San Diego (Region)	1,165,818	1,249,684	1,394,783	1,491,935	326,117	28
City of San Diego	518,137	559,143	640,668	695,703	177,566	34
Scripps Miramar Ranch Community Plan Area	7,227	7,342	7,455	7,508	281	4
Employment (Jobs)						
San Diego (Region)	1,450,913	1,624,124	1,769,938	1,911,405	460,492	32
City of San Diego	780,252	867,641	933,938	1,008,793	228,541	29
Scripps Miramar Ranch Community Plan Area	10,593	11,214	11,570	12,375	1,782	17

Sources: SANDAG 2013a, 2013b, 2013c.

As shown in Table 5.13-1, both the San Diego region and the City are forecasted to grow in population and housing stock between 2012 and 2050 by upwards of 28%–35%, while the Community Plan Area is forecasted to experience growth in population and housing stock between 2012 and 2050 by 4%–6% (SANDAG 2013a, 2013b, 2013c). The Scripps Miramar Ranch community is forecasted to experience approximately 17% growth in employment (jobs) between 2012 and 2050 (SANDAG 2013a).

Regional Housing Needs Assessment

In July 2020, SANDAG adopted the RHNA Plan for the 2021–2029 Housing Element cycle (also referred to as the sixth Housing Element cycle) (SANDAG 2020). Based on a methodology that weighs a number of factors (i.e., projected population growth, employment, commute patterns, and available sites), SANDAG determined quantifiable needs for housing units in the region according to various income categories. The RHNA allocates housing needs in four income categories (very low, low, moderate, and above moderate) for each jurisdiction that will be used in local housing elements; the City further splits the lowest category into extremely low and very low. In its final RHNA figures, SANDAG allocated 108,036 housing units to the City for the 2021–2029 Housing Element cycle, as outlined in Table 5.13-2 (City of San Diego 2020).

Table 5.13-2
City of San Diego Regional Housing Needs Assessment Allocation by Income Level (2021–2029 Housing Element Cycle)

Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
12,380	15,169	17,311	19,319	43,837	108,036

Source: City of San Diego 2020.

City of San Diego General Plan Housing Element 2021-2029

The current Housing Element was adopted in June 2020 for the 2021–2029 planning cycle. The current Housing Element seeks to improve transportation and land use coordination; create more compact, walkable, and transit-oriented communities; provide more housing capacity for all income levels; protect resource areas; and reduce development in the wildland-urban interface (City of San Diego 2020). In association with the SANDAG RHNA, the current Housing Element also includes the housing growth needs for 2021 through 2029 (108,036 housing units), as detailed in Table 5.13-2. The current Housing Element identifies adequate sites that can be developed for housing that are sufficient to provide for the jurisdiction's share of the regional housing need for all income levels.

The State Department of Housing and Community Development generally utilizes a threshold of 30 units per acre as the minimum density needed to potentially provide housing units for low- and very

low-income households in urban areas. In 2021, the City conducted a comprehensive adequate sites inventory in accordance with state law. The inventory results indicate that there was an overall inventory of land planned and zoned for residential use at 30 housing units per acre to accommodate approximately 174,673 additional units in the City. In addition, there are sufficient properties citywide that are presumed (according to state requirements) to be suitable for lower-income housing to meet the City's RHNA target of 44,880 housing units for extremely low-, very low-, and low-income households (City of San Diego 2020). The current Housing Element does not identify the project site as part of the housing sites inventory (City of San Diego 2020).

Scripps Miramar Ranch Community Plan

The Community Plan identifies the planned uses for the project site as Very Low Residential (3-5 dwelling units per net acre) and open space (Scripps Miramar Ranch Planning Committee et al. 2018). The Community Plan, Figure 7b "Area "E" Unit Allocation by Owner" identifies a maximum of 45 units on the project site.

5.13.3 IMPACT ANALYSIS

5.13.3.1 Issue 1: Population Growth

Issue 1: Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads and other infrastructure)?

Thresholds

Consistent with California Environmental Quality Act (CEQA) Guidelines Appendix G and the City's Significance Determination Thresholds (City of San Diego 2022) for growth inducement, a project would result in a significant impact to housing and population if the project would:

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

Impact Analysis

Indirect Growth Potential

The project proposes the development of an area that is currently served by existing utilities and infrastructure. Any proposed new infrastructure needed to serve the project would be connected to existing vehicular access and circulation, water, sewer, drainage, and dry utilities such as gas, electricity, and telecommunications systems. The proposed project would not indirectly induce a growth in population as no extension of infrastructure is proposed beyond what is required to

adequately serve the project. Additionally, the majority of the surrounding area is developed, and the project would connect two existing roadways within the neighborhood. The project would not otherwise result in the extension of infrastructure to an area that is currently undeveloped or underdeveloped, thereby removing barriers to growth. As such, the project would not induce substantial unplanned indirect growth.

Direct Growth Potential

As described previously, the project site is designated in the General Plan and Community Plan for open space and residential use. The project site is zoned as AR-1-1. While this site is zoned for residential use, the increase in density to the project site would require a Community Plan Amendment and a Rezone to allow for the proposed residential development on site. More specifically, the proposed Community Plan Amendment would change the existing density of the site from 1.1 du/ac, with a maximum of 45 units, to 2.8 du/ac, with a maximum of 112 units. The proposed Rezone would change the existing AR-1-1 zone to Residential–Small Lot (RX-1-2) where the single-family homes are proposed, Residential–Multiple Unit (RM-2-4) where the multifamily units are proposed, and Open Space–Residential (OR-1-2) where open space is proposed. The RX zone allows for both attached and detached single dwelling units on smaller lots than required in the Residential–Single Unit (RS) zones. RX-1-2 would require a minimum of 4,000-square-foot lots. The RM-2-4 permits a maximum density of 1 dwelling unit for each 1,750 square feet of lot area. The OR-1-2 zone allows open space with limited private residential development (City of San Diego 2021b). The rezone would change the allowed residential units from 4 to 112.

The proposed project would directly induce growth through the development of 100 single-family homes and 12 multifamily affordable income rental units (multifamily units) on an approximately 40.56-acre project site. Based on the population rate coefficient of 2.84 persons per household[1] for the Scripps Miramar Ranch community, the project would directly introduce an estimated 318 people to the area (SANDAG 2013c). The project site is currently zoned for 4 single-family units, which would have a population of approximately 11 people. Therefore, the project would result in an increase of 307 people compared to the current zoning. The SANDAG population growth forecasts rely, in part, on individual jurisdiction's planning documents, such as the City's General Plan. Because the project proposes a Rezone and a Community Plan Amendment to increase the density of the site, the increase of 307 people at the site would likely not have been accounted for in SANDAG's projections. The Community Plan Area has a forecasted population growth of 1,205

[1] There at multiple sources for estimations of a "person per household" rate. The analysis contained herein conservatively uses the SANDAG 2050 regional growth forecast rate for the Scripps Miramar Ranch community for year 2035, which is the highest out of each forecasted year (SANDAG 2013c). The City as a whole also has a forecasted rate of 2.65 persons per household in 2035 per SANDAG's regional growth forecast (SANDAG 2013b).

people. The project would account for approximately 26% of the expected population growth in the Community Plan Area.

The City's portion of the county's RHNA target for the 2021–2029 Housing Element period is 108,036 homes (City of San Diego 2020). While the City is planning for additional housing to meet the need and targeted to permit more than 88,000 new housing units between 2010–2020, less than half of those units were constructed (42,275) as of December 2019 (City of San Diego 2020). Considering this, the proposed construction of 112 units is anticipated to help accommodate the existing and planned population and population growth anticipated in the City and help with the existing housing shortage. Although the project proposes a Community Plan Amendment and Rezone that would allow for the site to be developed with an additional 307 residential units, proposed housing would be growth accommodating. Thus, although the project would result in population growth, because the project would provide housing to assist with the City's housing shortage, this growth would not be considered substantial. As stated above, the project would help meet the need for the housing, both market rate (100 units) and affordable (12 units), that has been identified state-wide and locally. Therefore, the project would not directly induce substantial unplanned population growth to the area.

Significance of Impact

The project would not result in the expansion of infrastructure that would trigger an indirect population increase to the area.

Despite the fact that the project's induced population would exceed current population and housing projections for the site, the project would provide housing within the City where there is a need for additional housing to accommodate planned growth. The project would not indirectly or directly induce substantial unplanned population growth to the area. Thus, impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.13.3.2 Issue 2: Replacement Housing

Issue 2: Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Thresholds

Consistent with CEQA Guidelines Appendix G, a project would result in a significant impact to housing and population if the project would:

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

Impact Analysis

The project site does contain one large residence on the project site and the proposed project would result in the demolition of this property. The proposed project would replace this single housing unit with 100 single-family housing units and 12 affordable multifamily housing units and would not require the construction of replacement housing elsewhere. Therefore, the project would not result in the substantial displacement of existing housing or people.

Significance of Impact

The project would not result in the displacement of a substantial number of existing housing or people. Impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

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5.14 PUBLIC SERVICES AND FACILITIES

This section describes the existing public services and facilities conditions of the proposed Renzulli Estates Project (project), identifies associated regulatory requirements, and evaluates potential impacts related to the implementation of the project. The following discussion is based upon the Fire Service Letter from the San Diego Fire-Rescue Department (December 2024) included as Appendix L1, Police Service Letter from the San Diego Police Department (January 2025) included as Appendix L2, and Fire Fuel Load Modeling Report prepared by Dudek (May 2025) included as Appendix L3.

5.14.1 EXISTING CONDITIONS

Existing Physical Conditions

Currently, the project site includes a large existing residence, several outbuildings, and two associated sheds, which are surrounded by existing residential development. The structures are accessible via the segment of Cypress Canyon Road that connects to Cypress Canyon Park Drive to the southeast. Additionally, in the center of the site is a cleared area that has been paved. Most of the project site remains undeveloped. The Multi-Habitat Planning Area, the hardline preserve developed by the City of San Diego (City), covers most of the project site. Surrounding land uses include residential development in all directions, with some adjacent park land.

Fire Rescue Services

The City of San Diego Fire–Rescue Department (SDFD) provides fire protection services throughout the City and project site. The SDFD's service area spans 343 square miles and serves a population of 1,419,845 (SDFD 2020). The SDFD has 52 fire stations and employs 892 full-time uniformed fire personnel (Appendices L1 and L3) (City of San Diego 2021a).

The project site is within the service area of and would be served by SDFD Station 37 (Table 5.14-1). Station 37 is approximately 1.3 miles west of the project site, at 11640 Spring Canyon Road. Station 37 operates and maintains a fire engine and ambulance and is equipped with a brush engine, designated specifically to address fires in rough terrain where site access and fire hydrants may be limited (Appendix L1). The station's service area spans approximately 13.9 square miles and includes the entire project site (City of San Diego 2021b). SDFD Station 44, 5.1 miles southwest of the project site, at 10011 Black Mountain Road, would serve as the second closest fire station and operates both a fire engine and fire truck to support the area (City of San Diego 2021b).

Table 5.14-1
City of San Diego Fire-Rescue Department Fire Station That Would Serve the Project Site

Station	Address	Apparatus	Distance from Project Site	Time to Project Site[1]
City of San Diego Fire Stations				
Station 37	11640 Spring Canyon Road	Engine 37, Brush 37, Paramedic 37	1.3 to 1.7 miles	2 minutes and 50 seconds to 3 minutes and 30 seconds

Source: Appendix L1; City of San Diego 2021b.
Notes:
1 Response times include dispatch and turnout time.

To treat medical patients and control small fires, the first-due unit should arrive within 7.5 minutes, 90% of the time, from the receipt of the 911 call in fire dispatch. This equates to 1-minute dispatch time, 1.5–minute company turnout time, and a 5-minute drive time in the most populated areas. To stop wildfires to under 3 acres (when noticed promptly) and to treat up to five medical patients, a multi-unit response team of at least 17 personnel should arrive within 10.5 minutes, 90% of the time, from the receipt of the 911 call in fire dispatch. This equates to 1-minute dispatch time, 1.5-minute company turnout time, and an 8-minute drive time in the most populated areas. Emergency travel time are derived from Google road data, while travel times are calculated using Insurance Services Office Public Protection Classification Program's Response Time Standard formula.[1] The Insurance Services Office response travel time formula discounts speed for intersections, vehicle deceleration and acceleration, and does not include turnout time (Appendix L3).

According to the City's General Plan, where more than 1 square mile is not populated at similar densities and/or a contiguous area with different density types aggregates into a population cluster area, standards for fire response times identified in Table PF-D.2 of the General Plan apply. The proposed project is located within an area that consists of a range of housing density types and is thus considered a population cluster. The urban-suburban aggregate population threshold applies to the proposed project, given the San Diego Association of Governments population estimate of 20,298 people for the Scripps Miramar Ranch Community Plan (Community Plan) Area (SANDAG 2021). These General Plan standards and the estimated response times to the project site are provided within Table 5.14-2. Due to the Community Plan Area's population of 20,298 people, the project would be located within the urban-suburban area.

[1] Time = 0.65 + 1.7(Distance)

Table 5.14-2
Aggregate Population and Travel Time Goals

Area	Aggregate Population	First-Due Unit Travel Time Goal
Metropolitan	>200,000 people	4 minutes
Urban-suburban	<200,000 people	5 minutes
Rural	500–1,000 people	12 minutes
Remote	<500 people	>15 minutes

Source: City of San Diego 2022a

Police Services

The surrounding area is served by the San Diego Police Department (SDPD) Northeastern Division, which serves a population of 234,394 people and encompasses 104 square miles, including the neighborhoods of Carmel Mountain, Miramar, Miramar Ranch North, Mira Mesa, Rancho Bernardo, Rancho Encantada, Rancho Peñasquitos, Sabre Springs, and Scripps Ranch (City of San Diego 2021c). The Northeastern Division Substation is approximately 3.91 miles from the project site, at 13396 Salmon River Road in Rancho Peñasquitos. The project site is within Beat 241 of the Scripps Ranch area of SDPD's Northeastern Division. The SDPD's current staffing ratio is 1.34 officers per 1,000 residents, based on the estimated residential population of 1,388,996 in 2024, but the SDPD is currently budgeted for approximately 1.48 officers per 1,000 population ratio (Appendix L2).

The SDPD currently utilizes a five-level priority calls dispatch system, which includes priorities E (emergency), one, two, three, and four. The priority system serves as a guide, allowing the phone dispatcher and the radio dispatcher discretion to raise or lower the call priority as necessary based on the information received. Priority E and priority one calls involve serious crimes in progress or a potential for injury. Priority two calls include vandalism, disturbances, and property crimes. Priority three calls include calls after a crime has been committed such as cold burglaries and loud music. Priority four calls include parking complaints or lost and found reports (City of San Diego 2022a). Table 5.14-3 lists the SDPD's response-time guidelines, as well as the current response time for calls within the project area.

Table 5.14-3
San Diego Police Department Call Priority Response Times

Call Priority	General Plan Response Time Goals[1]	Police Department Response Time Goals[2]	Average Response Time (2020)[2]
Priority E – Imminent threat to life	Within 7 minutes	Within 7 minutes	6.7 minutes
Priority 1 – Serious crimes in progress	Within 12 minutes	Within 14 minutes	23.7 minutes

Table 5.14-3
San Diego Police Department Call Priority Response Times

Call Priority	General Plan Response Time Goals[1]	Police Department Response Time Goals[2]	Average Response Time (2020)[2]
Priority 2 – Less serious crimes with no threat to life	Within 30 minutes	Within 27 minutes	68.7 minutes
Priority 3 – Minor crimes/requests that are not urgent	Within 90 minutes	Within 80 minutes	108.8 minutes
Priority 4 – Minor requests for police service	Within 90 minutes	Within 90 minutes	92.5 minutes

Sources: Appendix L2.
1 City of San Diego 2022a.
2 SDPD 2025.

As indicated in Table 5.14-3, no response times for any call classifications met the General Plan or SDPD response time goals, except for Priority E response times.

Public Parks and Recreation Facilities

The City's General Plan and Parks Master Plan guide development of park and recreational facilities on the project site. 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 2021d).

The Parks Master Plan park standard requires 100 recreational value points per 1,000 residents for parks, a 17,000-square-foot recreation center per 25,000 residents, and an aquatic complex per 50,000 residents (City of San Diego 2021e). The recreational value-based park standard establishes a point value to represent recreational opportunities within population-based parks. Recreational value emphasizes the activities and experiences that residents can enjoy in a park and the park's ability to support active recreation and exercise; encourage socializing; link people to transit, bike facilities, trails, and active public areas; and invite activity throughout the day.

The Community Plan Area contains eight parks and recreation facilities scattered throughout the community (Table 5.14-4). The park that is closest to the project site is Cypress Canyon Neighborhood Park, which is adjacent to the project site to the east. In total, the Community Plan Area includes 44.55 acres of parkland.

Table 5.14-4
Parks and Recreational Facilities within Scripps Miramar Ranch Community Plan Area

Park	Size (acres)	Distance from Project Site (mi)	Location
Cypress Canyon Neighborhood Park	12.23	0.17	11470 Cypress Canyon Road
Semillon Mini-Park	0.44	0.58	12074 Semillon Boulevard
Lakeview Neighborhood Park	13.2	1.25	10788 Mira Lago Trail
Jarabek Neighborhood Park	9.68	1.30	10150 Avenida Magnifica
Fairbrook Neighborhood Park	3.41	1.43	Fairbrook Road and Rue Fontenay
Forest View Mini Park	0.33	1.60	11201 Forestview Lane
Hoyt Neighborhood Park	3.00	2.32	10805 Canyon Lake Drive
Aviary Neighborhood Park	2.26	2.62	9782 Aviary Drive
Total	**44.55**	**—**	**—**

Source: City of San Diego 2022b.

Schools

The project site is located within the San Diego Unified School District (SDUSD) boundary and the project would be served by SDUSD for the provision of school services. The SDUSD operates 117 traditional elementary schools, six middle schools, nine kindergarten through grade 8 (K–8) schools, 24 traditional middle schools, 22 high schools, 49 charter schools, 13 atypical/ alternative schools and 5 additional program sites. The SDUSD has a total enrollment of 121,000 students within the kindergarten through grade 12 (K–12) school system (SDUSD 2021). Based on the current district attendance boundaries, the schools that would serve the project site are shown in Table 5.14-5.

Table 5.14-5
Schools that would Serve the Project Site

School	Grades	Location	Estimated Capacity	2020–2021 Enrollment	2021–2022 Enrollment	2022–2023 Projected Enrollment
E.B. Scripps Elementary School	K–5	11778 Cypress Canyon Road, San Diego, California 92131	910	738	715	695

Table 5.14-5
Schools that would Serve the Project Site

School	Grades	Location	Estimated Capacity	2020–2021 Enrollment	2021–2022 Enrollment	2022–2023 Projected Enrollment
Thurgood Marshall Middle School	6–8	9700 Avenue of Nations, San Diego, California 92131	1,500	1,455	1,353	1,301
Scripps Ranch High School	9–12	10410 Falcon Way, San Diego, California 92106	2,400	2,057	1,963	1,970

Source: Hudson, pers. comm., 2021.

Libraries

The project is located within the City's public library system. The City's General Plan establishes goals and policies for the library system and facilities. Per the General Plan, a library system should contribute to quality of life through technologically improved services and welcoming environments. General Plan policy indicates that branch libraries should be 15,000 square feet or larger and include features and services that address community-specific needs. Library design should incorporate public input to address the needs of the intended service area (City of San Diego 2022a). The nearest municipal library to the project is the Scripps Miramar Ranch Library, located 2.29 miles southwest of the project site at 10301 Scripps Lake Drive. The Scripps Miramar Ranch Library serves the communities of Scripps Ranch, Miramar, Sabre Springs, and Mira Mesa. The Scripps Miramar Ranch Library includes computers, meeting/study rooms, outdoor space, a children's computer area, an auditorium, and a community room (City of San Diego 2021f).

5.14.2 REGULATORY FRAMEWORK

State

Quimby Act and Assembly Bill 1359

The Quimby Act, which is within the Subdivision Map Act, authorizes the legislative body of a city or county to require the dedication of land or impose fees for park or recreational purposes as a condition of the approval of a tentative or parcel subdivision map, if specified requirements are met. One of these requirements is that the dedicated land or fees, or combination thereof, shall be used only for the purposes of developing or rehabilitating neighborhood or community park or recreational facilities to serve the subdivision for which the land was dedicated or fees were paid. The act provides that the dedication of land or the payment of fees, or both, shall not exceed the

proportionate amount necessary to provide 3 acres of park area per 1,000 persons residing within a subdivision subject to the act, except as specified.

Senate Bill 50

Senate Bill 50 was enacted on August 27, 1998. The bill authorized a $9.2 billion K–12 school and higher education bond to be presented to the voters of California. The state bond measure, known as the Class Size Reduction Kindergarten–University Public Education Facilities Bond Act of 1998, was approved by the voters on November 3, 1998.

Senate Bill 50 significantly revised developer fee and mitigation procedures for school facilities as set forth in Government Code Section 65996. The legislation holds that the statutory fees are the exclusive means of considering and mitigating school impacts. It does not just limit the mitigation that may be required, it limits the scope of the review and the findings to be adopted for school impacts. Once the statutory fee is paid, the impact would be mitigated because of the provision that the statutory fees constitute full and complete mitigation.

California Mutual Aid

The purpose of Emergency Management Mutual Aid is to provide emergency management personnel and technical specialists to support the disaster operations of affected jurisdictions during an emergency. In accordance with the California Master Mutual Aid Agreement, local and state emergency managers have responded in support of each other under a variety of plans and procedures. Immediately following the 1994 Northridge Earthquake, city and county emergency managers, along with the Coastal, Inland, and Southern Regions of the California Governor's Office of Emergency Services, developed Emergency Management Mutual Aid to provide a valuable service during the emergency response and recovery efforts at the Southern Region Emergency Operations Center, local emergency operations centers, the Disaster Recovery Center, local assistance centers, and in the field. Since that time, Emergency Management Mutual Aid has often been used to deploy emergency managers and other technical specialists not covered by law enforcement or fire mutual aid plans in support of emergency operations and response throughout California.

Local

City of San Diego General Plan

The Public Facilities, Services, and Safety Element of the General Plan addresses facilities and services that are publicly managed. Furthermore, this element provides policies for financing, prioritization, developer, and City funding responsibilities for public facilities in San Diego. In addition, Policy PF-B.4 requires development proposals to fully address impacts to public facilities

and services (City of San Diego 2022a). In addition, the Public Facilities, Services, and Safety Element provides service response time standards for both police and fire services within the City. The applicable response time goals and standards are provided in Table 5.14-2 for fire services and Table 5.14-3 for police services.

The Public Facilities, Services, and Safety Element also establishes guidelines and policies for branch libraries. Ideally, branch libraries should serve a resident population of 30,000 and may be established when a service area that is expected to grow to 30,000 residents within 20 years of library construction has a minimum population of 18,000–20,000. Branches should be located in areas of intense human activity, with a 2-mile maximum service area, where trips can be combined with other daily trips. The City is also part of a county-wide cooperative relationship known as the Serra Cooperative Library System. This system allows residents of the City and San Diego County to use the facilities of public libraries.

Regarding schools, the Public Facilities, Services, and Safety Element established goals for the City to provide a multilevel public and private school system that enables all students to realize their highest potential as individuals and as members of society; to provide educational facilities that are equitable, safe, healthy, technologically equipped, aesthetically pleasing, sustainable, supportive of optimal teaching and learning for all students, and welcoming to parents and community members; and to provide a public school system that provides opportunities for students to attend schools within their residential neighborhoods, as well as choices in educational settings outside their neighborhoods.

The Recreation Element (City of San Diego 2021d) of the City's General Plan provides the following categories of parks:

- Population-based parks (commonly known as Neighborhood and Community parks) facilities and services are located in close proximity to residential development and are intended to serve the daily needs of the neighborhood and community. When possible, they adjoin schools in order to share facilities, and ideally are within walking distance of the residences within their service area. As the category's name implies, these parks are developed based on population changes.
- Resource-based parks are located at, or centered on, notable natural or human-made features (beaches, canyons, habitat systems, lakes, historic sites, and cultural facilities) and are intended to serve the citywide population, as well as visitors.
- Open space lands are City-owned lands located throughout the City, consisting of canyons, mesas, and other natural landforms. This open space is intended to preserve and protect

native plants and animals, while providing public access and enjoyment by the use of hiking, biking, and equestrian trails.

Fire Hazard Severity Zones

Wildland fire protection in California is the responsibility of the state, local, or federal government. The California Department of Forestry and Fire Protection adopted Fire Hazard Severity Zone maps for State Responsibility Areas in 2007 and recommended maps for Very High Fire Hazard Severity Zones in Local Responsibility Areas. Local Responsibility Areas include incorporated cities, cultivated agricultural lands, and portions of the desert. As set forth in Government Code Sections 51175–51189, local agencies are required to designate Very High Fire Hazard Severity Zones within their jurisdiction. As identified in the City's Very Fire Hazard Severity Zone Map, the project site is classified as a Very High Fire Hazard Severity Zone (City of San Diego 2021g). Fire Hazard Severity Zones are based on increasing fire hazard and are designated as "No Designation," "Moderate," "High," or "Very High."

Fire Service Deployment

Fire stations are equipped to respond to calls within established standards based on speed and weight of attack (Citygate 2017). The speed of response is based on first-due, all-risk intervention units (engines, trucks, and/or rescue ambulances), which are strategically located across a community to respond in effective travel time. These units are tasked with controlling moderate emergencies without the incident escalating to a second alarm or greater size, which unnecessarily depletes departmental resources as multiple requests for service occur. Weight of attack refers to the number of units needed to respond to serious emergencies such as a room and contents structure fire, multiple patient incidents, a vehicle accident with extrication required, or a heavy rescue incident. In these situations, enough firefighters must be assembled within a reasonable timeframe to safely control the emergency, thereby keeping it from escalating to greater alarms (Citygate 2017). The science of fire crew deployment is to spread crews out across a community to keep emergencies small with positive outcomes, without spreading the crews too far apart that they cannot amass together quickly enough to be effective in major emergencies (Citygate 2017).

In 2011, the City retained Citygate Associates LLC to conduct a fire services deployment planning study to (1) further refine the findings of the Regional Fire Service Deployment Study that Citygate conducted for the County of San Diego that pertained to SDFD deployment within the City; (2) analyze whether the SDFD performance measures are appropriate and achievable given the risks, topography, and special hazards to be protected in the City; and (3) review existing SDFD deployment and staffing models for efficiency and effectiveness and determine how and where alternative deployment and staffing models could be beneficial to address current and projected

needs (Citygate 2017). Development projects will be reviewed for potential access and water supply issues and will be addressed upon final plan. The study concluded that additional fire-rescue resources were needed, and in response, the SDFD adopted the recommendations of the study and set new deployment standards. The deployment standards and fire station planning measures are described in the following sections.

Distribution of Fire Stations

To treat medical patients and control small fires, the first-due unit should arrive within 7.5 minutes 90% of the time from the receipt of the 911 call in fire dispatch. This equates to a 1-minute dispatch time, 1.5-minute company turnout time, and 5-minute drive time in the most populated areas (Citygate 2017).

Multiple-Unit Effective Response Force for Serious Emergencies

To confine fires near the room of origin, to keep wildland fires under 3 acres when noticed promptly, and to treat up to five medical patients at once, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes 90% of the time from the receipt of the 911 call in fire dispatch. This equates to a 1-minute dispatch time, 1.5-minute company turnout time, and 8-minute drive time spacing for multiple units in the most populated areas (Citygate 2017).

Fire Unit Deployment Measures

Population Density Measures

To direct fire station location timing and crew size planning as the City and communities grow, the adopted fire unit deployment performance measures based on population density zones are listed in the General Plan. According to Table PF-D.1 of the General Plan, structure fires in urban areas with over 1,000 people per square mile would require a response standard of 5 minutes for first-due travel time, 7.5 minutes for total reflex time, 8 minutes for first alarm travel time, and 10.5 minutes for first alarm total reflex. Reflex time is the total time from receipt of a 911 call to arrival of the required number of emergency units (City of San Diego 2022a.

Aggregate Population Measures

Standards listed in the General Plan guide the determination of response time measures and the need for fire stations. According to Table PF-D.2 of the General Plan, the first-due unit travel time goal for metropolitan areas of over 200,000 people is 4 minutes. Urban-suburban areas of less than 200,000 people would require a goal of 5 minutes (City of San Diego 2022a).

San Diego Municipal Code Section 142.0412

Section 142.0412 of the San Diego Municipal Code (SDMC) provides brush management regulations. Brush management is required in all base zones on publicly or privately owned premises that are within 100 feet of a structure and contain native or naturalized vegetation. There are two brush management zones, as identified in this section of the SDMC. Brush Management Zone One is the area adjacent to a structure, shall be least flammable, and shall typically consist of pavement and permanently irrigated ornamental planting. Brush Management Zone Two is the area between Zone One and any area of native or naturalized vegetation and typically consists of thinned, native or naturalized non-irrigated vegetation.

Scripps Miramar Ranch Public Facilities Financing Plan

As indicated in the General Plan, public financing for public services and facilities is provided by a variety of methods within the City. For the Community Plan Area, public service improvements are provided via the Scripps Miramar Ranch Public Facilities Financing Plan (PFFP). The Scripps Miramar Ranch PFFP was prepared in 2016, with the latest update completed in 2020. This plan identifies the needed public facility improvements for the community and a plan to provide financing and implement those needed improvements. As a part of this PFFP, fees are collected that go towards the improvements pursuant to SDMC Section 142.0640 and California Government Code Sections 66000 et seq. (Mitigation Fee Act). Currently fees are being collected towards a series of transportation, park, library, and fire-rescue projects. This includes the Fairbrook Neighborhood Park Development, Cypress Canyon Neighborhood Park Phase 2, Scripps Ranch Community Park Expansion, Jarabek Elementary School Joint-Use Improvements, Hendrix Pond/Aviary Park Development, and Park & Recreation Facilities Improvements. Improvements to the Scripps Ranch Library Parking Lot expansion and a future fire station are also included in the PFFP (City of San Diego 2020).

5.14.3 IMPACT ANALYSIS

5.14.3.1 Issue 1: New or Altered Public Facilities

Issue 1: Would the project have an effect upon, or result in a need for new or altered governmental services in any of the following areas: police protection, fire/life safety protection, libraries, parks or other recreational facilities, maintenance of public facilities including roads, and/or schools?

Thresholds

Per the City's Significance Determination Thresholds (City of San Diego 2022c), project impacts to public services and facilities would be significant if the project would:

- Have an effect upon, or result in a need for new or altered governmental services in any of the following areas: police protection, fire/life safety protection, libraries, parks or other recreational facilities, maintenance of public facilities including roads, and/or schools.

Impact Analysis

Fire-Rescue Services

The project would introduce 112 dwelling units to the project site, resulting in an increase in population base within the Community Plan Area and fire protection service area, thereby increasing the demand for fire protection and emergency services within the service area. As previously stated, Fire Station 37 is the closest fire station to the project site, located 1.3 miles west of the project site at 11640 Spring Canyon Road. Fire Station 37 could reach the project site within 2 minutes and 50 seconds, as shown in Table 5.14-1.

As stated above, to treat medical patients and control small fires, the first-due unit should arrive within 7.5 minutes, 90% of the time, from the receipt of the 911 call in fire dispatch. SDFD Fire Station 37 would meet this requirement, as shown in Table 5.14-1. To stop wildfires to under 3 acres (when noticed promptly) and to treat up to five medical patients, a multi-unit response of at least 17 personnel should arrive within 10.5 minutes, 90% of the time, from the receipt of the 911 call in fire dispatch.

The project would meet SDFD site design and construction design standards with respect to assuring adequate safety from fire hazards. The residential buildings and infrastructure proposed to be constructed as part of the proposed project would be constructed per applicable fire codes and comply with applicable City regulations. A site-specific evacuation plan has also been included in Appendix N. The evacuation plan establishes the framework and procedures for emergency operation agencies to implement a well-coordinated evacuation (Appendices N). The project would not involve the use, manufacture, or storage of hazardous materials. The project would provide such provisions as adequate turn-around radii for fire trucks within the internal roadway network and cul-de-sacs and key placement and installation of fire hydrants throughout the project site.

Due to the increased fire risk in wildland-urban influence areas, new requirements for development in these areas. The project would implement these requirements, including application of California Building Code Chapter 7A which includes ignition resistant building requirements; minimum 1-hour rated exterior walls and doors; multi-pane glazing with a minimum of one tempered pane, fire-resistance rating of not less than 20 minutes when tested according to National Fire Protection Association 257, or be tested to meet the performance requirements of State Fire Marshal Standard 12-7A-2; ember resistant vents (recommend BrandGuard or similar vents); and automatic, interior fire sprinkler system to code for occupancy type. Additionally, the project would conform to the brush management regulations in accordance with Section 142.0412 of the SDMC. Because the project requires a modification to the brush management zones as detailed in Appendix L3,

alternative compliance measures would be implemented to reduce fire risk. These measures are described in more detail in Section 5.19, Wildfire and Appendix L3.

The fire station within proximity to the project site would meet the standard response times required, and SDFD indicated that the project would not result in adverse effects to the SDFD's current response times and the ability to serve the area (Appendix L1). SDFD has facilities and staffing in the project area to serve the project, and no additional capacity would be required.

Overall, existing facilities would continue to serve the project site and would not require construction of new or alteration of existing facilities.

Police Services

The project would introduce up to a total of 112 dwelling units within the project site, resulting in the introduction of a new population base that would require police services. The closest substation to the project site is the Northeastern Division Substation, located approximately 3.9 miles from the project site, at 13396 Salmon River Road in Rancho Peñasquitos.

As indicated in Table 5.14-3, in 2017, the response times for Priority 1, Priority 2, Priority 3, and Priority 4 calls did not meet the General Plan and SDPD response time goals, and response times for Priority E calls did meet the response time goals (Appendix L2; City of San Diego 2022a SDPD 2025). The average response times in 2020 were 6.7 minutes for Priority E (emergency) calls, 23.7 minutes for Priority 1 calls, 68.7 minutes for Priority 2 calls, 108.8 minutes for Priority 3 calls, and 92.5 minutes for Priority 4 calls. Although the proposed project would result in additional residents and new housing that would require police services, the new housing development and the additional residential population base would be immediately surrounded by similar residential development, previously served by the same police service division. Although the project would result in an increase in population of the service area, the response times are already exceeding the goals prior to implementation of the project.

While there would be an increase in population through the introduction of 112 residential units, the project would not require new facilities and no improvements to existing faculties would be required as a result of implementing the proposed project. Ongoing funding for police services is provided by the City's General Fund; the project would generate taxes for and contribute funds to the General Fund. Further, the additional service needs would be provided through additional officers and vehicles, and not new or expanded facilities. Given the location adjacent to existing roadways and infrastructure, and SDPD's commitment to serve the project site, the project's physical impacts on police response times are not considered substantial. Overall, existing facilities would continue to serve the project site and would not require the alteration of construction of new facilities.

Public Parks and Recreation Facilities

Demands for parks and recreational facilities are directly related to local population levels. The project is intended to provide housing for a new population base within the Community Plan Area, which in turn would generate an additional use of park and recreation areas. The addition of 112 dwelling units would yield an estimated additional 318 new residents (based on the population rate coefficient of 2.84 persons per household for the Community Plan Area [SANDAG 2013]). At 100 recreational value points per 1,000 residents, the project would be required to provide 32 recreational value points and contribute to the project's fair share for recreation centers and aquatic complexes through payment of the new Citywide Parks Development Impact Fee.

Although the project would increase demand for recreational areas or uses in the community, the project would pay Citywide Parks Development Impact Fees towards parks and recreation facilities and therefore no physical impacts would occur. The project applicant would be required to pay the applicable Citywide Parks Development Impact Fees per the City's Development Impact Fee Schedule to satisfy General Plan population-based park standards. The project would not conflict with the City's General Plan requirements for parks and recreation facilities and would not directly result in the need for new or altered parks and recreational facilities.

Schools

Potential impacts to schools serving the project site would be related to the number of students generated by the proposed project. Student generation rates vary based on the type of residential development such as single-family attached/detached and multifamily housing. The estimated student generation rates for elementary, middle, and high schools associated with multifamily dwelling units, as well as the proposed project's estimated student generation amounts based on the proposed 12 multifamily dwelling units, are provided in Table 5.14-6. The estimated student generation rates for elementary, middle, and high schools associated with single-family dwelling units, as well as the proposed project's estimated student generation amounts based on the proposed 100 single-family dwelling units, are provided in Table 5.14-7.

Table 5.14-6
Student Generation Rates for Multifamily Housing Units

School Level (Grades)	Student Generation Rates (Multifamily)[1]	Multifamily Units Proposed	Proposed Project Student Generation[2]
Elementary school (K–5)	0.329–0.657	12	4–8
Middle school (6–8)	0.130–0.260	12	2–3

Table 5.14-6
Student Generation Rates for Multifamily Housing Units

School Level (Grades)	Student Generation Rates (Multifamily)[1]	Multifamily Units Proposed	Proposed Project Student Generation[2]
High school (9–12)	0.144–0.289	12	2–3
Total (Combined)	**0.603–1.206**	**N/A**	**7–14**

Source: Hudson, pers. comm., 2021.
Notes: N/A = not applicable.
[1] Student generation rates are a calculation of students per residential unit.
[2] Rounded up to the nearest whole number.

Table 5.14-7
Student Generation Rates for Single-Family Housing Units

School Level (Grades)	Student Generation Rates (Multifamily)[1]	Single-family Units Proposed	Proposed Project Student Generation[2]
Elementary school (K–5)	0.239–0.657	100	24–48
Middle school (6–8)	0.140–0.028	100	14–28
High school (9–12)	0.195–0.390	100	20–40
Total (Combined)	**0.574–1.148**	**N/A**	**58–116**

Source: Hudson, pers. comm., 2021.
Notes: N/A = not applicable.
[1] Student generation rates are a calculation of students per residential unit.
[2] Rounded up to the nearest whole number.

Based on the SDUSD multifamily and single-family student generation rates, the proposed project is estimated to generate a maximum of 56 elementary school students, 31 middle school students, and 43 high school students, resulting in a total of 130 students within the SDUSD school system. As determined by the SDUSD, the new student population generated by the project is not anticipated to cause the schools serving the project area to reach or exceed capacity and would not require the construction of new school facilities. The district currently does not have plans for new or expanded school facilities that would serve the project site (Hudson, pers. comm., 2021). The project would not impact SDUSD's ability to comply with Senate Bill 50, and the project would be required to pay all applicable school fees to SDUSD. The project would not have an adverse effect upon, or result in a need for new or modified schools, with payment of the school fees.

Libraries

The nearest municipal library to the project is the Scripps Miramar Ranch Library, located 2.29 miles southwest of the project site, at 10301 Scripps Lake Drive. This local branch is part of the City's library system, which allows residents to use any branch or the main library, and the Serra Cooperative Library System, which allows residents of the City and San Diego County to use public library facilities. The Scripps Miramar Ranch Library does satisfy the General Plan's policy recommendation that every branch library be at least 15,000 square feet as it is 21,700 square feet in size (City of San Diego 2021h). The Community Plan Area currently has an estimated population of 20,298 people. The project would introduce approximately 318 people to the project site, generating an estimated population of approximately 20,616, which is consistent with the General Plan standard that a branch library should serve a resident population of 30,000. Given the current estimated population with the addition of the population of the proposed project, there would not be a need to construct additional library facilities or expand any existing libraries.

Significance of Impact

Fire-Rescue Services

The project would result in a population increase that would increase fire-rescue service calls, but no new facilities or improvements to existing facilities would be required as a result of the project. Impacts would be less than significant.

Police Protection

The project would result in a population increase that would increase police service calls, but no new facilities or improvements to existing facilities would be required as a result of the project. Impacts would be less than significant.

Park and Recreation

The project would result in a population increase that would increase demand for parks, but no new facilities or improvements to existing facilities would be required as a result of the project. Impacts would be less than significant.

Schools

The project would generate students; however, the existing schools have sufficient capacity in the near term to serve these students, and the project applicant would pay facility fees per Senate Bill 50. Impacts would be less than significant.

Libraries

The project would result in a population increase that would increase use of library facilities, but no new facilities or improvements to existing facilities would be required as a result of the project. Impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation measures would be required.

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5.15 PUBLIC UTILITIES

This section describes the existing utility conditions of the proposed Renzulli Estates Project (project) site, identifies associated regulatory requirements, and evaluates potential impacts related to the implementation of the project. The following discussion is based on the following technical reports prepared for the project: Public Water System Analysis prepared by Dexter Wilson Engineering Inc. (Appendix M1; September 2024), Public Sewer System Analysis prepared by Dexter Wilson Engineering Inc. (Appendix M2; September 2024), and Waste Management Plan prepared by KLR Planning (Appendix M3; February 2024).

5.15.1 EXISTING CONDITIONS

Existing Physical Conditions

Currently, the project site includes a large existing residence, and two associated sheds. Public utility services, including sewer, water, solid waste, natural gas, and electricity, are currently provided to the project site as detailed below.

Water

Local Water Source and Supply

Water service to the project site is provided by the City's Public Utilities Department (PUD). The PUD serves nearly 1.4 million people populating over 404 square miles, with average deliveries of 155 million gallons per day (mgd). The PUD maintains a complex water system that includes 9 surface reservoirs, 3 drinking water treatment plants, 29 treated water storage facilities, 49 pump stations, and approximately 3,300 miles of water transmission and distribution pipelines (City of San Diego 2021a, 2022a).

The PUD has developed a separate recycled water system to offset the demand for potable water. The recycled water system includes three pump stations and 103 miles of purple pipe, delivering an average of over 10 mgd for irrigation, manufacturing and other non-potable uses). The goal is to reduce the City's dependence on imported water and increase reliability by providing non-potable water supplies. Recycled water service is available through the North City Water Reclamation Plant (northern service area) and the South Bay Water Reclamation Plant (southern service area). Recycled water is approved for use in some construction activities, recreational water bodies, and the irrigation of parks, playgrounds, schoolyards, residential landscaping, common areas, nurseries, freeway landscaping, golf courses, dual plumbed-uses, and cooling towers. Customers can purchase recycled water for approved uses if they are fronting an existing recycled water distribution pipeline

(City of San Diego 2021b). The nearest recycled water distribution center is the Canyonside Recycled Water Pump Station.

The City currently purchases most of its potable water from the San Diego County Water Authority (SDCWA), a wholesale water agency that provides water to its 24 member agencies in San Diego County (City of San Diego 2021b). The SDCWA, in turn, purchases much of its water from the Metropolitan Water District of Southern California (MWD). Below is a summary of these water supply sources.

The Metropolitan Water District of Southern California

MWD is a consortium of 26 cities and water districts that provides imported water to nearly 19 million people in parts of Los Angeles, Orange, San Diego, Riverside, San Bernardino, and Ventura counties. MWD currently delivers an average of 1.5 billion gallons per day (gpd) to a 5,200-square-mile service area (MWD 2021). MWD imports its water from two main sources—the Colorado River (via the Colorado River Aqueduct) and the Sacramento and San Joaquin Rivers (via the State Water Project). Together, these two sources provide approximately 50% of Southern California's water; the remainder comes from various local sources. The Colorado River Aqueduct is owned and operated by MWD and extends approximately 242 miles from the Colorado River at Lake Havasu to Lake Mathews in Riverside County. From there, a series of canals, siphons, pipelines, and pump stations moves water west to several MWD reservoirs for local distribution. The principal structure conveying water south through the State Water Project is the California Aqueduct, which extends approximately 444 miles south from the Sacramento–San Joaquin Delta (Delta) to Lake Perris in Riverside County (MWD 2021). Additional water sources currently or potentially available to MWD include local supplies, groundwater banking, water transfers, seawater desalination, and water recycling (MWD 2021).

San Diego County Water Authority

The SDCWA is an independent public agency that serves as a wholesale water supplier to its 24 member agencies. The SDCWA supplies approximately 95% of the population of San Diego County, in a service area of 951,000 acres (SDCWA 2015). The SDCWA operates and maintains a regional water delivery system capable of delivering more than 900 mgd of water. This system consists of 2 major aqueducts and numerous related facilities, including approximately 310 miles of pipeline and over 100 flow control facilities (SDCWA 2021).

SDCWA water is imported from MWD under a transfer agreement with Imperial Irrigation District and agreements for the lining of the All American and Coachella Canals via the Quantification Settlement Agreement of October 2003. Most of this water is obtained from the Colorado River and the State Water Project through an extensive system of pipes and aqueducts (SDCWA 2021).

Both MWD and SDCWA provide water to their member agencies to meet projected water demand based on regional population forecasts. The San Diego Association of Governments is responsible for providing and updating land use planning and demographic forecasts for the County. MWD and SDCWA update their water demand and supply estimates based on the most recent demographic forecasts approximately every 5 years to coincide with preparation of their respective Urban Water Management Plans (UWMPs) (SDCWA 2021).

SDCWA's 2020 UWMP includes a summary of the total projected water supplies and demands over the next 20 years in 5-year increments (2020–2040) under normal, single dry, and multiple dry water years within SDCWA's service area (which includes the City Municipal Water District). SDCWA's reliability assessment demonstrates that with very conservative assumptions regarding the availability of dry year supplies from MWD, the San Diego region's existing and projected water resource mix is increasingly drought-resilient, and there would be no shortages anticipated in normal year, drought year, or multiple dry year projections in the service area (SDCWA 2021).

As stated, SDCWA also has applied very conservative assumptions regarding the availability of dry-year supplies from MWD. For instance, SDCWA has assumed that: (1) MWD is limited to 1.3 million acre-feet of supplies due to dry conditions and increased reductions in deliveries from the State Water Project (no Delta improvements) and/or a reduction in Colorado River deliveries; and (2) SDCWA receives its preferential right based on MWD's current method of calculating such rights (SDCWA 2021).

Furthermore, SDCWA's 2015 Annual Report, Beyond Drought: Reliable Water in an Era of Change, states that SDCWA has diversified its supply sources to ensure water reliability in drought years when supplies from MWD may be limited (SDCWA 2015). This diversification includes independent water transfers from the Colorado River, working with the member agencies to increase conservation, increasing the use of recycled water, and using local groundwater (SDCWA 2015). The report also states that SDCWA's most significant accomplishment of the year was proving the value of the region's long-term strategy to develop a diversified water portfolio. In a year of serious drought, SDCWA and its member agencies not only had enough water to meet demands, but they had enough to start storing water behind the raised San Vicente Dam, which was completed in 2014 (SDCWA 2015).

As part of a diversified portfolio, the Carlsbad Desalination Plant, which began commercial operations in December 2015, can provide a highly reliable drought-resilient local potable water supply of up to 56,000 acre-feet per year (AFY) for the region, available in both normal and dry year conditions. SDCWA provided the opportunity for its member agencies—including the City—to enter into contracts to purchase desalinated water produced from the plant.

In summary, water agencies throughout California continue to face climatological, environmental, legal, and other challenges that impact water supply, such as court rulings regarding listed fish species, State Water Resources Control Board (SWRCB) water quality restrictions, and recent drought conditions. Challenges such as these will always be present. Nonetheless, the regional water supply agencies, MWD and SDCWA, contemplate sufficient, reliable supplies to serve existing and projected future demand.

MWD's and SDCWA's overall reliability goal is to deliver an adequate, reliable, and high-quality water supply for their customers, even during dry periods or severe droughts (MWD 2021, SDCWA 2021). Based on conservative water supply and demand assumptions contained in MWD's and SDCWA's 2021 UWMPs for a long-term planning horizon over the next 25 years, in combination with conservation of non-essential demand during certain dry years, MWD and SDCWA have determined that implementing their related and coordinated water plans will successfully achieve this goal.

City of San Diego Public Utilities Department

In June 2021, the City adopted its most recent UWMP (City of San Diego 2021b) which outlines current and future water supplies and demands in the City's service area. The City is engaged in several strategies to increase water reliability, including the development of local groundwater supplies, increased utilization of recycled water or potable reuse, continued conservation efforts, and ongoing strategic water resources planning. The UWMP projects water supply reliability for average years, single dry years, and multiple dry years, and concludes that the PUD will have sufficient water supplies to serve the City through the year 2045 (City of San Diego 2021b).

Conservation

The City's Water Conservation Program, implemented by the PUD, aims to reduce water use in San Diego by offering various rebate programs, landscaping classes, education, and free water conservation surveys for property owners and tenants. These programs are credited with achieving over 32.2 mgd of potable water savings (City of San Diego 2016). Depending on conditions, these savings can account for as much as 20% of raw water purchases annually. Water conservation continues to be a priority throughout California, and water suppliers are tasked with adopting programs and policies designed to promote water conservation practices and implementing comprehensive public information and educational campaigns.

Potable Water Service

The following information is based on the Water System Analysis prepared by Dexter Wilson Engineering (Appendix M1) regarding existing water infrastructure on the project site.

As shown in Figure 3-6, Existing and Proposed Water Facilities, there are existing public water facilities within and directly adjacent to the project. There are two pressure zones pertinent to the project site: the Scripps Ranch 1020 Pressure Zone and the Scripps Ranch Boosted 1150 Pressure Zone. More specifically, one existing 16-inch 1020 Pressure Zone water line is located at the intersection of Angelique Street and Cypress Canyon Road. Additionally, an existing 8-inch water line is located near the intersection of Cypress Canyon Road and Caminito Dulce, in the 1050 Pressure Zone.

Water Infrastructure

The PUD's water system consists of more than 3,300 miles of pipelines, including transmission lines up to 84 inches in diameter and distribution lines as small as 4 inches in diameter. Transmission lines are pipelines 16 inches and larger in diameter that convey raw water to the water treatment plants and convey treated water from the water treatment plants to treated water storage facilities. Distribution lines are pipelines 16 inches and smaller in diameter that directly service the retail users connected to a meter. In addition, the PUD maintains and operates 49 water pump stations that deliver treated water from the water treatment plants to more than 276,000 metered service connections in 130 different pressure zones. The PUD also maintains several emergency connections to and from neighboring water agencies, including the following:

- Santa Fe Irrigation District Miramar Wastewater Treatment Plant (WTP)
- City of Poway (Miramar WTP)
- Olivenhain Municipal Water District (Miramar WTP)
- Cal-American Water Company (Alvarado and Otay WTP)
- Sweetwater Authority (Otay WTP)
- Otay Water District (Otay WTP)

The North City Water Reclamation Plant is located in the Miramar area, and treats an average of 18,482 AFY of wastewater, although the plant has an ultimate treatment capability of 33,604 AFY. The Northern Service Area distribution system consists of 91 miles of recycled water pipeline, two reservoirs, and two pump stations, with service to 574 meters. The South Bay Water Reclamation Plant is located near the international border with Mexico, and treats an average of 8,961 AFY of wastewater, although the plant has a treatment capability of 16,802 AFY. The Southern Service Area distribution system consists of 3 miles of recycled water pipeline, one storage tank, one pump station, and 7 meters.

Wastewater Infrastructure

Wastewater collection and treatment services are provided by the Wastewater Branch of the PUD. The City wastewater system consists of two components:

- The Metropolitan Sewerage Sub-System treats the wastewater from the City and 15 other cities and districts from a 450-square-mile area. An average of 160 mgd of wastewater is treated. Planned improvements will increase wastewater treatment capacity to serve an estimated population of 2.8 million through the year 2050.
- The Municipal Wastewater Collection Sub-System is responsible for the collection and conveyance of wastewater from residences and businesses in the City, serving a 330-square-mile area.

The City's wastewater facilities include the Point Loma WTP, the North City Water Reclamation Plant, the South Bay Water Reclamation Plant, and the Metro Biosolids Center. The Point Loma WTP, which would serve the proposed project, treats approximately 10 mgd of wastewater and has a treatment capacity of 30 mgd.

Wastewater Service Infrastructure

The following information is based on the Public Sewer System Analysis prepared by Dexter Wilson Engineering (Appendix M2) regarding existing wastewater infrastructure on the project site.

The City of San Diego Trunk Sewer system under collects the wastewater flow from the area surrounding the project site. The City of San Diego Trunk Sewer has a large diameter (approximately 30-inch diameter) that connects to other subsequent downstream sewers. Figure 3-7, Existing Wastewater Facilities, presents existing sewer facilities in the vicinity of the project site.

Solid Waste Management

Solid waste management in the project area is provided by the City Environmental Services Department (ESD) and private collectors. The City provides refuse collection for residents that are located on dedicated public streets, provide adequate safe space and access for storage and collection, and comply with regulations set forth in the San Diego Municipal Code (SDMC) and Waste Management Guidelines. Other customers pay for service by private hauling companies that are franchised by the City.

The closest landfill to the proposed project is the Miramar Landfill, which is located approximately 7.5 miles from the project site. It is located in Kearny Mesa and owned/operated by ESD. The

Miramar Landfill receives approximately 910,000 tons of trash per year. At this rate of disposal, the Miramar Landfill, which is the only City-run landfill, will likely be filled to capacity and close by 2031 (City of San Diego 2024).

Additional active solid waste landfills within San Diego County include Borrego Springs Landfill, Otay Landfill, Sycamore Landfill, San Onofre Landfill, and Las Pulgas Landfill. Of these, the two closest facilities are Sycamore Landfill and Otay Landfill. Sycamore Landfill is located approximately 16 miles from the site, with a remaining capacity of approximately 114 million cubic yards (cy) as of 2016. The Sycamore Landfill is permitted to receive a maximum of 5,000 tons per day and has a maximum permitted capacity of 148 million cy with a projected closing date of December 31, 2042 (CalRecycle 2019a). Otay Landfill is located approximately 30 miles from the project site, with a remaining capacity of approximately 21 million cy as of 2016. This landfill is permitted to receive a maximum of 6,700 tons per day with a maximum permitted capacity of 61 million cy. The projected closing date is February 28, 2030 (CalRecycle 2019b).

Electricity and Natural Gas

The project area is served by San Diego Gas & Electric. San Diego Gas & Electric is a regulated public utility that provides energy service to 3.6 million people through 1.4 million electric meters and 870,000 natural gas meters in San Diego County and southern Orange County, within a service area of 4,100 square miles (SDG&E 2022). Forecasting future energy consumption demand is performed on a continual basis by San Diego Gas & Electric, including the need for installation of transmission and distribution lines. In situations where project with large power loads are planned, other loads in the project vicinity are considered in conjunction with the planned project, and electrical substations are upgraded as needed.

5.15.2 REGULATORY FRAMEWORK

Federal

Federal Water Pollution Control Act of 1972 (Clean Water Act)

The principal federal law regulating water quality in the United States is the 1972 Federal Water Pollution Control Act, also known as the Clean Water Act. The fundamental purpose of the Clean Water Act is the protection of designated beneficial uses of water resources. The Clean Water Act establishes a system of water quality standards, discharge limitations, and permits; it requires states to adopt water quality standards to protect public health and welfare, enhance the quality of water, and serve the other purposes of the Clean Water Act. The Clean Water Act was amended in 1987 to include urban and stormwater runoff, which required many cities to obtain a National Pollutant Discharge Elimination System permit for stormwater conveyance system discharges.

Under Section 404 of the Clean Water Act, the U.S. Army Corps of Engineers regulates discharges of dredged or fill material into waters of the United States, requiring issuance of a Section 404 permit. Under Section 401 of the Clean Water Act, a state water quality certification must be obtained whenever an application for a federal permit for discharge of pollutants into waters of the United States is submitted, such as a Section 404 permit. The Section 401 certification requires that any activity affecting waters of the United States be in compliance with all applicable water quality standards, limitations, and restrictions.

Safe Drinking Water Act

Passed in 1974 and amended in 1986 and 1996, the Safe Drinking Water Act grants the U.S. Environmental Protection Agency the authority to set drinking water standards. Drinking water standards apply to public water systems, which provide water for human consumption through at least 15 service connections, or regularly serve at least 25 individuals. There are two categories of drinking water standards, (1) the National Primary Drinking Water Regulations and (2) the National Secondary Drinking Water Regulations. The National Primary Drinking Water Regulations are legally enforceable standards that apply to public water systems. These standards protect drinking water quality by limiting the levels of specific contaminants that can adversely affect public health and are known or anticipated to occur in water. The National Secondary Drinking Water Regulations are non-mandatory guidelines for certain substances that do not present a risk to public health.

Water Resources Development Act

The Water Resources Development Act (passed December 2016) includes short-term provisions that sunset after 5 years. These provisions increase pumping operations in the Delta at the highest levels allowed under biological opinions issued by state and federal wildlife agencies under the Endangered Species Acts, unless the pertinent agencies show that the increased pumping would cause additional adverse effects on listed fish (smelt and salmonid) species beyond the range of effects anticipated in those opinions, using the best scientific and commercial data available. The biological opinions have been subject to years of litigation between farming interests, urban water districts, fishing associations, and environmental groups, with the current versions upheld by the Ninth Circuit Court of Appeals. The new law's long-term provisions include significant funding authorizations that also should result in more water availability throughout California. These funding authorizations include long-term water infrastructure projects such as storage and groundwater projects; water recycling, reuse, and conservation projects; and design and construction of desalination projects. The additional funds will help supplement California's water bond.

State

Safe Drinking Water Act

The State Safe Drinking Water Act (Health & Safety Code, Sections 116270 et seq.) builds on and strengthens the federal Safe Drinking Water Act. The state act authorizes the state's Department of Public Health to protect the public from contaminants in drinking water by establishing maximum contaminant levels that are at least as stringent as those developed by the U.S. Environmental Protection Agency under the federal act.

California Drinking Water Standards

State drinking water standards are based on federal standards and are listed in Title 22 of the California Code of Regulations. The California Department of Health Services administers the state drinking water standards.

Water Conservation Act of 2009

The Water Conservation Act (SBX7-7) (Water Code Section 10608) requires that all water suppliers increase water-use efficiency. This legislation sets an overall goal of reducing per-capita urban water use, compared to 2009 use, by 20% by December 31, 2020.

California Water Code

The California Water Code contains provisions that control almost every consideration of water and its use. Division 2 of the California Water Code provides that the SWRCB shall consider and act upon all applications for permits to appropriate waters. Division 6 of the Water Code controls conservation, development, and utilization of state water resources. Division 7 addresses water quality protection and management.

Senate Bill 610

State legislation has improved the link between water supply and land use planning. Senate Bill (SB) 610 (Water Code Sections 10910 et seq.) requires the preparation of a water supply assessment for projects within cities and counties that propose any of the following:

- Residential developments of more than 500 dwelling units
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space

- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space
- Hotels, motels, or both, having more than 500 rooms
- Industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area
- Mixed-use projects that include one or more of the projects specified in Water Code Section 10912(a)
- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling-unit project

SB 610 stipulates that when environmental review of certain large development projects is required, the water agency that is to serve the development must complete a water supply assessment to evaluate water supplies that are or will be available during normal, single dry, and multiple dry years during a 20-year projection to meet existing and planned future demands, including the demand associated with the proposed project (DWR 2003). Because the proposed project includes less than 500 residential units, a water supply assessment is not required or addressed further herein.

Senate Bill 221

Enacted in 2001, SB 221 (Government Code Sections 66455.3 and 66473.7) requires that the legislative body of a city or county, which is empowered to approve, disapprove, or conditionally approve a subdivision map, must condition such approval upon proof of sufficient water supply. The term "sufficient water supply" is defined in SB 221 as the total water supplies available during normal, single dry, and multiple dry water years within a 20-year projection that would meet the projected demand associated with the proposed subdivision. The definition of sufficient water supply also includes the requirement that sufficient water encompass not only the proposed development, but also existing and planned future uses, including, but not limited to, agricultural and industrial uses.

SB 221 requirements apply to proposed development that is considered a "project" under SB 610 (DWR 2003). Thus, SB 221 applies to the proposed project.

Urban Water Management Planning Act

The 1983 Urban Water Management Planning Act (California Water Code Sections 10610–10656) requires specified urban water suppliers within the state to prepare a UWMP and update it every 5 years. State and local agencies and the public frequently use such plans to determine if agencies are

planning adequately to reliably meet water demand in various service areas. As such, the plans serve as an important element in documenting water supply availability and reliability for compliance with state laws, including SB 610 and SB 221 (discussed above), which link water supply sufficiency to large land-use development project approvals. Urban water suppliers also must prepare such plans, pursuant to the Urban Water Management Planning Act, to be eligible for state funding and drought assistance.

UWMPs provide information on water usage, water supply sources, and water reliability planning. They also may provide implementation schedules to meet projected demands over a planning horizon, a description of opportunities for new development of desalinated water, groundwater information (where groundwater is identified as an existing or planned water source), a description of water quality over the planning horizon, and identification of water management tools that maximize local resources and minimize imported water supplies. A UWMP's water supply analysis includes a water supply reliability assessment, water shortage contingency plan, and development of a plan in case of an interruption in water supply**.**

UWMPs are required by all the water purveyors related to the proposed project, including the City, SDCWA, and MWD.

Delta Plan

Water supplies in California are based largely around the Delta. Water from Northern California surface waters and snowmelt travels to and through the Delta to Central Valley urban and agricultural users and to Southern California through aqueducts, dams, and other infrastructure. The Sacramento–San Joaquin Delta Reform Act (Water Code Section 85000 et seq.) established the Delta Stewardship Council, which has the primary goal of developing and implementing an enforceable, long-term management plan for the Delta (Delta Plan). The Delta Plan's coequal goals of providing a more reliable water supply for California while restoring the Delta ecosystem are the foundation of all state water management policies. As required by statute, the Delta Plan adopts a science-based adaptive management strategy to manage decision making in the face of uncertainty (Water Code Section 85308[f]). The law requires that the Delta Plan be updated every 5 years, and each update is intended to build on an evolving base of knowledge, direct near- and mid-term actions, and preserve and protect longer-term opportunities.

California Water Plan

Water Code Sections 10004 through 10013 describe the components and characteristics of the California Water Plan, which addresses the coordinated control, protection, conservation, development, and utilization of the state's water resources. Updated every 5 years, the most recent water plan is the California Water Plan Update 2018, released in June 2019.

California Water Recycling Standards

The California Legislature has developed state requirements for the production, discharge, distribution, and use of recycled water. These requirements are contained in the California Code of Regulations, Title 22, Division 4, Chapter 3, Reclamation Criteria, Sections 60301 through 60475, and Title 17. The California Department of Public Health administers the state recycling water standards.

California Green Building Standards Code

The California Green Building Standards Code (CALGreen) is set forth in California Code of Regulations, Title 24, Part 11, and establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development and water conservation, among other issues. Under CALGreen 2022, all water closets (i.e., flush toilets) are limited to 1.28 gallons per flush, and urinals are limited to 0.5 gallons per flush. In addition, maximum flow rates for faucets are established as follows: 1.8 gallons per minute (gpm) at 80 pounds per square inch for showerheads; 1.2 gpm at 60 per square inch for residential lavatory faucets; and 1.8 gpm at 60 per square inch for kitchen faucets.

CALGreen also includes Section 4.408.2, a Construction Waste Management Plan. This plan identifies which waste created during construction could be sorted on site or bulked and then transported to diversion facilities.

Water Conservation Projects Act

The state requirements for water conservation, which are codified in the Water Conservation Projects Act of 1985 (California Water Code, Sections 11950–11954), encourage local agencies and private enterprise to implement potential water conservation and reclamation projects. Potential water conservation and reclamation projects may include facilities for municipal and industrial advanced wastewater treatment, regulatory impoundments, improvements to water supply and delivery systems, tailwater recovery systems, and sprinkler or drip irrigation systems.

General Waste Discharge Requirements

On May 2, 2006, the SWRCB adopted a General Waste Discharge Requirement (Order No. 2006-0003) for all publicly owned sanitary sewer collection systems in California with more than 1 mile of sewer pipe. The order provides a consistent statewide approach to reducing sanitary sewer overflows by requiring public sewer system operators to take all feasible steps to control the volume of waste discharged into the system in order to prevent sanitary sewer waste from entering the storm sewer system, and to develop a Sewer System Management Plan. The General Waste

Discharge Requirement also requires that storm sewer overflows be reported to the SWRCB using an online reporting system.

California Porter–Cologne Water Quality Control Act

The Porter–Cologne Water Quality Control Act is the principal state law enacted to establish requirements for adequate planning, implementation, management, and enforcement of water quality controls. The Porter–Cologne Water Quality Control Act, which became Division 7 of the California Water Code, establishes a regulatory program to protect water quality and beneficial uses of all state waters, outlined the responsibilities and authorities of the nine Regional Water Quality Control Board, and established the SWRCB. For the San Diego Hydrologic Region, water quality is regulated by the San Diego Regional Water Quality Control Board, Region 9 of the SWRCB. Each Regional Water Quality Control Board is directed to create a water quality control plan, to include three main components: (1) beneficial uses that are to be protected, (2) water quality objectives that protect those uses, and (3) an implementation plan to accomplish those objectives.

California Integrated Waste Management Act – Assembly Bill 939

The Integrated Waste Management Act requires each county to prepare a Countywide Integrated Waste Management Plan with input from each city in a given county. This plan is reviewed at least once every 5 years to ensure that waste management practices remain consistent with the practices defined in the Public Resources Code. As part of the Countywide Integrated Waste Management Plan, each jurisdiction (cities and county) is required to prepare and maintain Source Reduction and Recycling, Household Hazardous Waste, and Non-Disposal Facility Elements. The Countywide Integrated Waste Management Plan is a summary plan that combines all these elements and is required to be approved by the county Board of Supervisors and the majority of the cities within the county.

California Mandatory Commercial Organics Recycling – Assembly Bill 1826

In October 2014, Governor Brown signed Assembly Bill (AB) 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses, including multi-family residential dwellings that consists of five or more units. Organic waste is defined as food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. However, multi-family dwellings are not required to have a food waste diversion program. This law phases in the mandatory recycling of commercial organics over time, while also offering an exemption process for rural counties. In particular, the minimum threshold

of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to comply.

California Solid Waste Reuse and Recycling Access Act of 1991 – Assembly Bill 1327

AB 1327, which was established in 1991, required the California Department of Resources, Recycling and Recover (CalRecycle) to develop a model ordinance for the adoption of recyclable materials in development projects. Local agencies were then required to adopt the model, or an ordinance of their own, governing adequate areas for collection and loading of recyclable materials in development projects.

Disposal Measurement System Act of 2008 – Senate Bill 1016

SB 1016 maintains the 50% diversion rate requirement established by AB 939, and also established revised calculations for those entities that did not meet the 50% diversion rate. SB 1016 also established a per-capita disposal measurement system to make the process of goal measurement, as established by AB 939, simpler, timelier, and more accurate. The new disposal-based indicator—the per-capita disposal rate—uses only two factors, (1) a jurisdiction's population (or in some cases employment) and (2) its disposal rate as reported by disposal facilities.

Solid Waste Diversion – Assembly Bill 341

Effective July 1, 2012, AB 341 requires that commercial enterprises that generate 4 cy or more of solid waste weekly participate in recycling programs. This requirement also includes multi-family housing complexes of five units or more, regardless of the amount of solid waste generated each week. The purpose of this requirement is to reduce greenhouse gas emissions by diverting commercial solid waste to recycling and to expand recycling opportunities in California. As part of implementing AB 341, the California Legislature set an ambitious goal of 75% recycling, composting, or source reduction of solid waste by 2020. The law calls for the state and CalRecycle to take a statewide approach to decreasing California's reliance on landfills. CalRecycle is actively working to develop and implement programs to achieve the 75% target.

Organic Waste Disposal – Senate Bill 1383

In September 2016, the State Legislature brought forward SB 1383, to reduce greenhouse gasses and associated climate change. SB 1383 established statewide targets to reduce the amount of organic waste disposal in landfills. More specifically, it required a 50% reduction by 2020 and 75% by 2025. In addition, it established a State goal to reduce food waste by 20% by 2025 by donating it to people in need. To achieve these goals, CalRecycle adopted regulations in November 2020 that took effect January 2022.

Local

City of San Diego General Plan

The City's Public Facilities, Services, and Safety Element (July 2024) of the General Plan addresses facilities and services that are publicly managed and have a direct influence on the location of land uses. These include Fire-Rescue, Police, Wastewater, Storm Water, Water Infrastructure, Waste Management, Libraries, Schools, Information Infrastructure, Disaster Preparedness, and Seismic Safety. The purpose of this chapter is to provide the public facilities and services needed to serve the existing population and new growth.

Wastewater Policies

PF-F.1 Meet or exceed federal and state regulatory mandates cost effectively.

PF-F.5 Construct and maintain facilities to accommodate regional growth projections that are consistent with sustainable development policies (see also Conservation Element, Section A).

PF-F.6 Coordinate land use planning and wastewater infrastructure planning to provide for future development and maintain adequate service levels.

Stormwater Infrastructure Policies

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.

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.

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.

Water Infrastructure Policies

PF-H.3 Coordinate land use planning and water infrastructure planning with local, state, and regional agencies to provide for future development, maintain adequate service levels, and develop water supply options during emergency situations.

a. Plan for a water supply and emergency reserves to meet peak load demand during a natural disaster such as a fire or earthquake.

b. Plan for water supply and emergency reserves recognizing anticipated Climate Change impacts.

c. Recognize the water/energy nexus. Plan and implement water projects after consideration of their energy demands in coordination with energy suppliers to minimize and optimize the energy impact of projects.

Waste Management Policies

PF-I.1 Provide efficient and effective waste collection services.

a. Encourage waste reduction and recycling with source-separated collection of materials.

b. Provide space for recycling containers and efficient collection.

PF-I.2 Maximize waste reduction and diversion (see also Conservation Element, Policy CE.A.9).

a. Conveniently locate facilities and informational guidelines to encourage waste reduction, diversion, and recycling practices.

b. Support resource recovery programs that produce soil additives, mulch, or compost from yard debris and organic waste.

c. Maximize the separation of recyclable and compostable materials.

d. Reduce and recycle Construction and Demolition (C&D) debris.

e. Strive for recycling of 100 percent of inert C&D materials and a minimum of 50 percent by weight of all other material.

f. Encourage the private sector to build a mixed construction and demolition waste materials recycling facility.

Utility Policies

PF-M.3 Integrate the design and siting of safe and efficient public utilities and associated facilities into the early stages of the long-range planning and development process, especially in redevelopment/urban areas where land constraints exist.

PF-M.4.d For projects, in particular large-scale developments (such as those requiring redevelopment plans, community plan updates, general plan amendments), consult and coordinate with all appropriate public utilities early on to determine the type, size, and location of facilities that are needed to accommodate the project's increased demand.

City of San Diego Ordinance 0-17327 (Mandatory Water Reuse Ordinance)

This ordinance, adopted by the City Council in 1989, requires that "recycled water shall be used within the City where feasible and consistent with the legal requirements, preservation of public health, safety, and welfare, and the environment." All development projects are required to install an additional water pipeline reserved for reclaimed water. Compliance with this ordinance for new development is made a condition of tentative maps, land use permits, etc., based on the project's location within an existing or proposed recycled water service area.

City of San Diego Drought Restrictions

The City has year-round city and state permanent mandatory water restrictions (City of San Diego 2025). These restrictions apply to those whose property lies within the PUD's service area. These water restrictions include the following:

- A customer shall not allow potable water to irrigate outdoor landscapes in a manner that causes runoff, such that, water flows onto adjacent property, non-irrigated areas, private and public walkways, roadways, parking lots, or structures.
- Customers shall repair or stop all water leaks upon discovery or within 72 hours of notification by the City of San Diego.
- Customers shall not wash down sidewalks, driveways, parking areas, tennis courts, or other paved areas without using a power washer or a hose with a shutoff nozzle. Washing any paved areas is only allowed to alleviate immediate safety or sanitation hazards. Water shall be collected and prevented from leaving the property and entering the municipal separate storm sewer system.
- Customers shall not overfill swimming pools and spas.

- Customers shall not use non-recirculating potable water in ornamental fountains or cascading fountains.
- Customers shall not use a hose that dispenses potable water to wash a motor vehicle, except where the hose is fitted with a shut-off nozzle or device attached to it that causes it to cease dispensing water immediately when not in use.
- Single pass-through cooling systems, as part of water service connections, shall be prohibited after the effective date of this section. Non-recirculating systems in all conveyer car wash and commercial laundry systems shall be prohibited after the effective date of this section.
- The serving of drinking water other than upon request in eating or drinking establishments, including but not limited to restaurants, hotels, cafes, cafeterias, bars, or other public places where food or drink are served and/or purchased is prohibited.
- To promote water conservation, operators of hotels and motels shall provide guests with the option of choosing not to have towels and linens laundered daily. The hotel or motel shall prominently display notice of this option in each guestroom using clear and easily understood language.
- Potted plants, non-commercial vegetable gardens and fruit trees, residential and commercial landscapes, including golf courses, parks, school grounds and recreation fields, may only be watered before 10 a.m. or after 6 p.m.
- The irrigation with potable water of ornamental turf on public street medians shall be prohibited.
- The application of potable water to outdoor landscapes during and within 48 hours after measurable rainfall shall be prohibited.

City of San Diego Zero Waste Plan

The City's Zero Waste Plan, a component of the City's Climate Action Plan, was approved and adopted by the City Council on July 13, 2015. The Zero Waste Plan lays out strategies to be implemented by the City to accomplish the following goals:

- Target 75% diversion by 2020, 90% diversion by 2035, and "zero waste" by 2040 by identifying potential diversion strategies for future action. To increase the City's waste diversion rate to 75% will require an estimated additional 332,000 tons per year to be diverted from landfill disposal;
- Demonstrate continuous improvement towards a goal of zero waste to landfills;
- Emphasize education by renewing City public information efforts;

- Promote local policies and ordinances and legislation at the state level that encourage
- manufacturers, consumers, and waste producers to be responsible for waste;
- Investigate appropriate new technologies; and
- Re-emphasize market development at the local and state level.

The City's ESD estimates that compliance with existing City codes and ordinances alone (including the Refuse and Recyclable Materials Storage Regulations [SDMC Chapter 14, Article 2, Division 8], Recycling Ordinance [SDMC Chapter 6, Article 6, Division 7], and the Construction and Demolition (C&D) Debris Deposit Ordinance [SDMC Chapter 6, Article 6, Division 6]) would achieve only an approximate 40% diversion rate, which is substantially below the current 75% diversion level targeted by the state and the goals of the City's Zero Waste Plan.

The Recycling Ordinance requires all single-family, multi-family, and commercial uses to participate in a recycling program by separating recyclable materials from other solid waste and depositing the recyclable materials in the approved recycling containers. The C&D Debris Deposit Ordinance requires project applicants to submit a Waste Management Form with the building permit or demolition/removal permit, to provide a general estimate of the total waste generated by the project including how much would be recycled. The code requires a minimum diversion rate of 50% for building permits or demolition/removal permits issued within 180 calendar days of the effective date of the ordinance, and a minimum diversion rate of 75% for building permits or demolition/removal permits issued after 180 calendar days from the effective date of the ordinance, provided that a certified recycling facility which accepts mixed C&D debris is operating within 25 miles of the City Administrative Building, located at 202 C Street, San Diego (City of San Diego 2015a). The Preliminary Waste Management Plan identifies the certified Otay C&D/Inert Debris Processing Facility in Chula Vista.

City of San Diego Municipal Code

In compliance with AB 939 and AB 341, the City is currently at a waste diversion rate of 67%. The City has adopted programs and policies requiring individual developments to incorporate recycling, including recycling of organic waste and waste reduction measures; waste reduction and recycling programs have been implemented to assist the City in reducing waste in compliance with state law. In compliance with SB 1383, the City introduced an Organic Waste Recycling program for all residents.

The following sections of the SDMC target waste reduction:

Chapter 6, Article 6, Division 6**.** This section (and related ordinances) requires project applicants to submit a Waste Management Form with the building permit or demolition/removal permit, to provide a general estimate of total project waste generation, including how much would be recycled. The code requires a minimum diversion rate of 50% for building permits or demolition/removal permits issued within 180 calendar days of the effective date of the ordinance. A minimum diversion rate of 75% is required for building permits or demolition/removal permits issued more than 180 calendar days after the effective date of the ordinance, provided that a certified recycling facility that accepts mixed C&D debris operates within 25 miles of the City Administrative Building, which is the case here with the Otay C&D/Inert Debris Processing Facility in Chula Vista.

Chapter 6, Article 6, Division 7 (Recycling Ordinance). This section requires all single-family, multi-family, and commercial uses to participate in a recycling program by separating recyclable materials, including organic waste, from other solid waste and depositing the recyclable materials in approved recycling containers.

Chapter 14, Article 2, Division 8 (Refuse and Recyclable Material Storage Regulations). This section is intended to encourage solid waste recycling through requirements to provide permanent, adequate, and convenient space for the storage and collection of refuse and recyclable material. Specific requirements for new nonresidential development include the provision at least one exterior refuse and recyclable material storage area per building, with related storage area capacity based on the gross floor area of associated buildings.

City of San Diego Water System Design Criteria

Book 2 of the City of San Diego Guidelines and Standards was used to analyze the water system. A summary of the design criteria from Book 2 is presented in Table 5.15-1 below.

Table 5.15-1
City of San Diego Water System Design Criteria

Criteria	Design Requirement
Minimum Static Pressure	65 psi
Maximum Static Pressure	120 psi
Maximum Pressure Drop – Reservoir Out of Service	40 psi
Maximum Pressure Drop – Peak Hour & Max Day Plus Fire	25 psi
Minimum Pressure – Peak Hour	40 psi
Minimum Pressure – Max Day plus Fire	20 psi

Table 5.15-1
City of San Diego Water System Design Criteria

Criteria	Design Requirement
Maximum Pipeline Velocity (Fire Flow)[1]	15 fps
Maximum Pipeline Velocity (Normal Operating Conditions)[2]	5 fps

Source: City of San Diego 2013.
Notes: psi = pounds per square inch; fps= feet per second.
[1] Section 3.3.1 E
[2] Section 3.10.1

City of San Diego Land Development Code – Landscape Standards

The Landscape Standards establish the minimum plant material, irrigation, brush management, and landscape related standards for work done in accordance with requirements of Land Development Code. They provide guidelines and alternative methods to meet regulations based on various site conditions. Additionally, the Landscape Standards provide the technical standards to create and maintain landscapes that conserve and efficiently use water. Applicants proposing landscape work should also obtain copies of the Submittal Requirements in the Land Development Manual. These establish the materials and information that must be submitted with an application for review by the City and establish applicable drafting standards for landscape drawings (City of San Diego 2016b).

5.15.3 IMPACTS ANALYSIS

5.15.3.1 Issue 1: Alterations and Additions of Public Utilities

Issue 1: Would the project result in a need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts with regard to the following utilities: water; sewer; and solid waste disposal?

Thresholds

According to the City's Significance Determination Thresholds (City of San Diego 2022a), impact analysis of public utilities should focus on the physical impacts associated with the construction or expansion of existing public utilities. Impacts to public utilities would be significant if the removal, construction, and/or relocation of the utility would:

- Result in direct impacts from the construction of new or expanded public utilities needed to serve the project; and/or
- Construct, demolish, and/or renovate 1,000,000 SF or more of building space, which would generate approximately 1,500 tons or more of waste. For projects over 1,000,000 SF, a

> significant direct solid waste impact would result if compliance with the City's ordinances and the WMP [waste management plan] fails to reduce the impacts of such projects to below a level of significance and/or if a WMP for the project is not prepared and conceptually approved by the ESD prior to distribution of the draft environmental document for public review.

In addition, the City's Significance Determination Thresholds note the following guidance should be considered in determining whether utility work could have significant environmental effects.

Would removal, construction, and/or relocation of the utility:

- Be compatible with existing and adjacent land uses?
- Change drainage or affect water quality/runoff?
- Affect air quality?
- Have a negative aesthetic affect?
- Increase noise levels to existing receptors?
- Affect biological resources including habitat?

Impact Analysis

Water

The City's PUD service area total water demand forecast for 2025 is 202,685 AFY, or 125,656.58 gpm (City of San Diego 2021b). The water demand for the service area and the corresponding proposed public water facility analysis was developed in accordance with Book 2 of the City of San Diego Design Guidelines and Standards. Residential water demand is estimated to be approximately 150 gpd per person. The project proposes 100 single-family dwelling units and 12 multi-family dwelling units. Table 5.15-2 provides the estimated average water demand associated with the proposed project. The project is expected to result in a total water demand of 57,900 gpd (52,500 gpd from the single-family units and 5,400 gpd from the multi-family units).

Table 5.15-2
Projected Average Water Demand

Land Use	Quantity	Water Demand Factor	Water Use, gpd
Single Family Residential	100 dwelling units	525 gpd/unit	52,500
Multi-Family Residential	12 dwelling units	450 gpd/unit	5,400
		Total	**57,900 gpd = 40.2 gpm**

Source: Appendix M1.
Notes: gpd = gallons per day, gpm = gallons per minute

Based on the City of San Diego Guidelines and Standards, the project's estimated maximum day demand would be 0.10 mgd (69.8 gpm) (Appendix M1). From the City of San Diego Guidelines and Standards, the maximum day demand to average annual demand ratio is approximately 3.5 based on the Inland North peaking curve, resulting in an estimated maximum day demand of 0.10 mgd (69.8 gpm) (Appendix M1). The peak hour demand to average annual demand ratio for the project is approximately 5.25 based on the Inland North peaking curve, resulting in an estimated peak hour demand of 0.3 mgd (209.5 gpm). The project's estimated maximum day demand of 69.8 gpm and the estimated peak hour demand of 209.5 gpm aligns with the City's forecasted water demand and would not require the construction of new or expanded public utilities needed to serve the project.

As concluded in Appendix M1, the maximum static pressure within the project would range between a low of 52 pounds per square inch (psi) and a high of 73 psi, which is marginally below the City's design criteria range from 65 psi to 120 psi.

Two public water system improvements are proposed for the project and includes an extension of public water lines to connect the proposed public water lines on the project site to the existing off-site waterline. This improvement can be seen in Figure 3-7, Existing and Proposed Water Facilities. Within the northern 1020 Pressure Zone, project water lines would connect to the existing 16-inch water line via 16-inch piping at the intersection of Angelique Street and Cypress Canyon Road. Within the boundaries of the project site, 16 inch and 8-inch pipping would be used for the waterlines throughout the 1020 Pressure Zone throughout the project site. Project water lines would connect to existing 16-inch water lines near the intersection of Cypress Canyon Road and Caminito Dulce through a 16-inch off-site public connection. The new public water system and improvements on site would be adequately designed and sized to meet the project's water needs in conformance with City Design Guidelines and Standards.

The project would connect to existing 12-inch water mains adjacent to the site at Cypress Canyon Road/Angelique Street, and Cypress Canyon Road. Private systems within each unit would be designed in accordance with City of San Diego standards and plumbing code standards. Final construction design/details for private water systems internal to each residential unit would be provided consistent with this environmental impact report (EIR) and the approved Tentative Map. Any impacts relative to the construction and installation of private water supply infrastructure are included as part of the project and analyzed herein.

Any impacts relative to the construction and installation of water supply infrastructure are included as part of the proposed project and analyzed herein. Potential significant environmental impacts associated with such construction include air quality, traffic, biological resources, cultural resources, noise, hydrology, water quality, and other impacts as identified and analyzed in Chapter 5 of this EIR. None of those sections identified construction or operation of the project's new or expanded water

supply infrastructure as resulting in significant impacts apart from those already analyzed in this EIR. The proposed improvements described above would be installed within the project site and would not result in significant environmental effects beyond what has been analyzed within this EIR.

Wastewater

Proposed Public Wastewater Infrastructure

The project would construct a new on-site sewer system, consisting of a network of 8-inch sewer mains that would connect the internal wastewater systems for each dwelling unit to the existing 30-inch trunk sewer within Sabre Springs Parkway. The Public Sewer System Analysis prepared for the project (Appendix M2) identified one connection, via Cypress Canyon Road and Mundial Street, to an existing 8-inch gravity sewer system at Angelique Street. No off-site gravity sewer improvements are required to existing infrastructure beyond those connections included as a part of the project. The sewage would ultimately flow to the City of San Diego's Public Utilizes Department Point Loma WTP.

As analyzed in the Public Sewer System Analysis prepared for the project (Appendix M2), the project has been designed in accordance with the City of San Diego Sewer Design Guide, revised May 2015 (City of San Diego 2015b). Table 5.15-3 shows the generation rates for the project. The downstream system was analyzed to the point in the system where the projected peak flow from the proposed project is less than 10% of the total flow per Section 1.7.1 of the City of San Diego Sewer Design Guide, which occurs within the 30-inch trunk sewer. The project is expected to generate a peak wet weather flow of 124,320 or 86.4 mgd. When added to existing peak flows in the trunk sewer, total flows would approximately equate to a Depth of flow to Pipe Diameter ratio of 0.42. As analyzed and concluded in the Preliminary Sewer Study, the proposed and existing sewer facilities are adequate to serve the project while meeting the required velocity and flow depth criteria. No off-site improvements are required beyond those connections included as a part of the project (Appendix M2).

Table 5.15-3
Project Sewer Generation

Land Use	Quantity (units)	Population per DU	Generation Rate per DU (gpd/ DU)	Average Sewer Generation (gpd)
Angelique Street Connection				
Single Family Residential	100	3.4	280	28,000
Multi-Family Residential	12	3.4	280	3,360
Total Project Flows	**112**	**—**	**—**	**31,360 (21.7 gpm)**

Source: Appendix M2.
Notes: DU =dwelling units; gpd= gallons per day.

Potential significant environmental impacts associated with such construction include air quality, traffic, biological resources, cultural resources, noise, hydrology, water quality, and other impacts as identified and analyzed in Chapter 5 of this EIR. None of those sections identified construction or operation of the project's new or expanded wastewater infrastructure as resulting in significant impacts apart from those already analyzed in this EIR. In addition, pipeline construction would require trenching, also as part of the grading stages of the proposed project, which have been assessed in this EIR.

Wastewater infrastructure would be designed in accordance with City of San Diego Sewer Design Guide. The proposed wastewater improvements described above would be installed within the project site, would meet the needs of the project, and would not result in significant environmental effects beyond what has been analyzed within this EIR.

Solid Waste

Although the project would not demolish, construct, or renovate more than 1,000,000 square feet of building space, the project would generate more than 1,500 tons of solid waste materials during construction and operation; therefore, the project would exceed the City's threshold for direct solid waste impacts. Further, the project proposes the construction of more than 40,000 square feet, thereby also exceeding the City's threshold for cumulative solid waste impacts (see Chapter 6, Cumulative Impacts). Pursuant to the City's Significance Determination Thresholds, a WMP was prepared to identify waste reduction, recycling, and waste diversion measures.

The purpose of a WMP is to identify the potential waste generated and diverted during demolition, construction, and operation, associated with a project, and to identify measures to reduce potential impacts associated with management of such waste. The project's WMP addresses construction phases as well as the post-construction/occupancy phase of the project and identifies the types and projected amount of waste that would be generated, disposed, salvaged, and recycled, as applicable. The WMP describes the project measures and design features that would reduce the amount of waste generated and how waste reduction and recycling goals would be achieved. The following discussion of potential solid waste generation resulting from implementation of the project and related waste diversion measures is based on the WMP (Appendix M3). The WMP would be implemented as a Project Design Feature (PDF), PDF-UTIL-1.

Demolition and Construction Waste

The City's C&D Debris Diversion Deposit Program applies to all applicants for building, demolition, and removal permits. This ordinance (SDMC Section 66.0601) requires that the applicant post a deposit which is held by the City until the applicant demonstrates that a minimum amount of the

material generated has been diverted from landfills. The ordinance requires demolition and new construction projects to divert 65% of the waste produced during the project.

Mixed construction debris recycling facilities in the City are evaluated quarterly to determine how much of the throughput is recycled and how much is a "residual" material requiring disposal. Facilities that accept mixed debris typically achieve a 68% or less diversion rate. Single material recyclers, such as metal recyclers, often achieve a near 100% diversion rate. When comingled materials are sent to a mixed facility, the 75% diversion goal established by AB 341 will not be met. Depending on the project, to ensure that the overall C&D diversion goal is attained, some materials must be separated and trucked to facilities with higher diversion rates, such as aggregate and metal recyclers. Implementation of the WMP involves a target of 20% recycled material, 75% for landfill diversion, and 81% of the construction materials generated are targeted for diversion.

Demolition

Demolition of existing on-site structures would occur over a period of approximately 2 months. The demolition phase would include the deconstruction/demolition and removal of the existing residence, associated sheds, and asphalt. Table 5.15-4 summarizes the type and amount of demolition materials, as well as diversion/disposal, anticipated from the project. Recycled materials would be redirected to appropriate recipients selected from ESD's directory of facilities that recycle demolition materials, scrap metal, and yard waste, as indicated in Table 5.15-4 below.

Table 5.15-4
Demolition Waste

Material Type	Estimated Waste Quantity (tons)	Handling	Estimated Diversion (tons)	Estimated Disposal (tons)
Asphalt and concrete	990.82	**Hanson Aggregates** *9229 Harris Plant Road* *San Diego, California 92126* (100% diversion)	990.82	—
Foundation/ Building Structure	1320.50	**Vulcan Carroll Canyon Landfill and Recycle Site** *10051 Black Mountain Road* *San Diego, California 92126* (100% diversion)	1320.50	—

Table 5.15-4
Demolition Waste

Material Type	Estimated Waste Quantity (tons)	Handling	Estimated Diversion (tons)	Estimated Disposal (tons)
Brick/ Masonry/ Tile	468.62	**Vulcan Carroll Canyon Landfill and Recycle Site** *10051 Black Mountain Road* *San Diego, California 92126* (100% diversion)	468.62	—
Cubs/ Gutter	81.63	**Vulcan Carroll Canyon Landfill and Recycle Site** *10051 Black Mountain Road* *San Diego, California 92126* (100% diversion)	81.63	—
Switch Gear/ Cable	0.33	**Vulcan Carroll Canyon Landfill and Recycle Site** *10051 Black Mountain Road* *San Diego, California 92126* (100% diversion)	0.33	—
Drywall	164.14	**EDCO Station Transfer and Buy Back Center** *8184 Commercial Street* *La Mesa, California 91942* (70% diversion)	115.60	49.54
Landscape materials	99.08	**Miramar Greenery** *5180 Convoy Street* *San Diego, California 92111* (100% diversion)	99.08	—
Roofing Materials	82.57	**LEED Recycling** *8725 Miramar Place* *San Diego, California 92121* (100% diversion)	82.57	—
Floor Tile	0.33	**Otay C&D/Inert Debris Processing Facility** *1700 Maxwell Road* *Chula Vista, California 91913* (76% diversion)	0.25	0.08
Glass	7.20	**Otay C&D/Inert Debris Processing Facility** *1700 Maxwell Road* *Chula Vista, California 91913*	4.89	2.30

Table 5.15-4
Demolition Waste

Material Type	Estimated Waste Quantity (tons)	Handling	Estimated Diversion (tons)	Estimated Disposal (tons)
		(76% diversion)		
Non- Usable Lumber	3.30	**Otay C&D/Inert Debris Processing Facility** *1700 Maxwell Road* *Chula Vista, California 91913* (76% diversion)	2.48	0.83
Garbage/ Trash	82.57	**Miramar Landfill** *5180 Convoy Street* *San Diego, California 92111* (0% diversion)	—	82.57
Total	**3,302.12**		**3,166.79**	**135.33**

Source: Appendix M3.

Approximately 3,302.12 tons of waste is expected to be generated during demolition. Approximately 3,166.79 tons of material would be recycled, including trees, concrete, asphalt, foundations, building structure, masonry walls, curb and gutter, and green waste. Approximately 135.33 tons of debris would be transported to a landfill, including unusable lumber, drywall, glass, miscellaneous trash, roofing paper, broken roof tiles, and floor tile.

Construction

Construction activities would generate waste, including packaging materials, wood pallets, and other miscellaneous debris. Construction debris would be separated on site into material-specific containers to facilitate reuse and recycling and to increase the efficiency of waste reclamation in accordance with this WMP. The project would provide sufficient refuse, organic waste, and recycling containers and education to comply with City ordinances and provide sufficient waste diversion. Source separation of materials at the construction site is essential to (1) ensure the appropriate waste diversion rate is met, (2) minimize costs associated with transportation and disposal, and (3) facilitate compliance with the C&D ordinance. The types of construction waste anticipated to be generated include the following: asphalt and concrete, landscape debris, mixed C&D debris, and garbage/trash. The amount of construction waste is estimated in Table 5.15-5 below.

Table 5.15-5
Construction Waste

Material Type	Estimated Waste Quantity (tons)	Handling	Estimated Diversion (tons)	Estimated Disposal (tons)
Asphalt and concrete	363.00	**Hanson Aggregates** 9229 Harris Plant Road San Diego, California 92126 (100% diversion)	363.00	—
Brick/ Masonry/ Tile	103.71	**Vulcan Carroll Canyon Landfill and Recycle Site** 10051 Black Mountain Road San Diego, California 92126 (100% diversion)	103.71	—
Cardboard	10.19	**Allan Company** 6733 Consolidated Way San Diego, California 92121 (100% diversion)	5.61	4.59
Carpet, Padding/ Foam	5.18	**DFS Flooring** 10178 Willow Creek Road San Diego, California 92131 (100% diversion)	5.18	—
Drywall	72.60	**EDCO Station Transfer and Buy Back Center** 8184 Commercial Street La Mesa, California 91942 (70% diversion)	39.93	32.67
Landscape Debris	10.36	**Miramar Greenery** 5180 Convoy Street San Diego, California 92111 (100% diversion)	10.36	—
Mixed C&D debris	311.16	**Otay C&D/Inert Debris Processing Facility**	171.14	140.02

Table 5.15-5
Construction Waste

Material Type	Estimated Waste Quantity (tons)	Handling	Estimated Diversion (tons)	Estimated Disposal (tons)
		1700 Maxwell Road Chula Vista, California 91913 (79% diversion)		
Roofing Materials	5.25	**LEED Recycling** 8725 Miramar Place San Diego, California 92121 (100% diversion)	5.25	—
Scrap Metal	25.20	**Allan Company** 6733 Consolidated Way San Diego, California 92121 (100% diversion)	13.86	11.34
Unpainted Wood & Pallets	124.44	**Miramar Greenery** 5180 Convoy Street San Diego, California 92111 (100% diversion)	124.44	—
Garbage/ Trash	5.25	**Miramar Landfill** 5180 Convoy Street San Diego, California 92111 (0% diversion)	—	5.25
Total	**1,036.34**	**—**	**842.47**	**193.87**

Source: Appendix M3
Note: C&D = construction and demolition.

During construction, the project is expected to generate approximately 1,036.34 tons of waste. Approximately 81% (842.48 tons) of waste that includes concrete, asphalt, cardboard, wood, metal, masonry walls, curb and gutter, and scrap metal. In accordance with State diversion targets, a minimum of 75% of construction materials would be recycled (see Table 5.15-5). Recycled materials would be redirected to appropriate recipients selected from ESD's directory of facilities that recycle construction materials, scrap metal, and yard waste.

Operational Waste

Operation of the project would involve on-going waste generation from the residential development. As shown in Table 5.15-6, the expected waste generated per year from the project when fully occupied would be approximately 134.4 tons. The estimated solid waste generation during occupancy was estimated using the California Emissions Estimator Model.

Table 5.15-6
Estimated Solid Waste Generation from Project Operations

Use	Intensity (units)	Waste Generation Rate (tons/year/unit)	Estimated Waste Generated (tons/year)*
Residential	112	1.2	134.4

Source: Appendix A of Appendix C.
Note:
* Estimated using the California Emissions Estimator Model 2016.3.2.

The project would be required to provide sufficient refuse and recyclables storage to comply with the SDMC Section 142.0820, which states that each dwelling unit and each structure that contains dwelling units shall be equipped with interior and exterior refuse, organic waste, and recycling storage areas, respectively. A minimum of 264 square feet of refuse storage area, 264 square feet of organic waste storage area, and 264 square feet of recyclable material storage area, for a total of at least 792 square feet of exterior refuse and recyclable material storage area would need to be provided for the residential areas of the project (Table 5.15-7).

Table 5.15-7
Minimum Exterior Refuse and Recyclable Material Storage Areas for the Project

Development	Number of Units	Minimum Refuse Storage Areas (square feet)	Minimum Organic Waste Storage Area (square feet)	Minimum Recyclable Material Storage Area (square feet)	Total Minimum Storage Area (square feet)
Residential (12 Multi-Family Units, 100 Single Family Homes)	112	240	240	240	720
Total	**112**	**240**	**240**	**240**	**720**

Source: Appendix M3.

Pursuant to SDMC Article 6, Division 7 (Recycling Ordinance) and SDMC Chapter 14, Article 2, Division 8 (Refuse, Organic Waste, and Recyclable Material Storage Regulations), the site shall provide on-site recycling services and associated storage space for the multi-family residential development. The recycling services shall include, at a minimum, the following:

- Collection of recyclable materials at least twice monthly;
- Collection of plastic bottles, plastic and glass jars, paper and newspaper, metal containers, and cardboard;
- Designated recycling collection and storage areas, with proper recycling receptacles, organic waste receptacles, and signage that comply with the Environmental Services Department's Container and Signage Guidelines; and
- Collection of organic waste materials for recycling. AB 1826 and AB 1383 require multifamily properties to arrange for organic materials recycling. Organic waste materials include yard clippings, landscape materials, and food waste. The site would provide food waste bins for residents to collect food waste. The food waste, yard clippings, and landscape materials would be composted through a private hauler.

In accordance with SDMC Section 66.0706(f), the site shall educate occupants about the recycling services by providing the following:

- Information shall be provided to all occupants annually, to new occupants upon move-in, and to all occupants upon any change in the recycling service at the site including:
    - Information on the types of recyclable materials accepted,
    - The occupants' responsibility to recycle, and
    - The location of recycling containers.

Further waste reduction methods and environmentally preferable practices during occupancy relate to plant selection, use of reclaimed water and low-yield drip irrigation where appropriate, use of efficient lighting and plumbing, as well as collection of green waste for management and recycling by a local facility. Additional waste reduction methods could include mulching, grass-cycling, reducing lawn size, and proper pruning.

As shown in Table 5.14-6, occupancy of the project is expected to generate approximately 134.4 tons of waste per year (Appendix M3).

Significance of Impact

Water

Water infrastructure would be designed and sized to meet the project's water needs in conformance with City standards, the construction of which were considered and addressed within the EIR herein. Impacts would be less than significant.

Wastewater

The project's construction impacts associated with the installation of new or expanded wastewater facilities were considered and addressed within the EIR herein. Impacts would be less than significant.

Solid Waste

The waste diversion measures, along with the waste reduction measures identified in the WMP (PDF-UTIL-1), would reduce the project impacts related to solid wastes to less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation is required.

5.15.3.2 Issues 2 and 3: Fuel, Energy, and Power

Issue 2: Would the project result in the use of excessive amounts of fuel or energy (e.g., natural gas)?

Issue 3: Would the project result in the use of excessive amounts of power?

Thresholds

According to the City's Significance Determination Thresholds (City of San Diego 2022c), public utility impacts related to power and gas are handled on a case-by-case basis through consultation with San Diego Gas & Electric. For this analysis, public utility impacts related to fuel, energy, and power would be significant if a project would:

- Substantially increase the consumption of electricity, natural gas, gasoline, or diesel such that the construction of new facilities and sources of energy or major improvements to local infrastructure would be required.

Impact Analysis

For further discussion on the impact analysis below regarding electricity, natural gas, and petroleum, refer to Section 5.5, Energy.

Electricity

Construction Use

Temporary electric power for as-necessary lighting and electronic equipment may be needed inside temporary construction trailers. However, the electricity used for such activities would be temporary and would not require major improvements to local infrastructure.

Operational Use

The operational phase would require electricity for multiple purposes including, but not limited to, building heating and cooling, lighting, appliances, electronics, etc. Based on the California Emissions Estimator Model, it was estimated that the proposed project would consume approximately 831,897 kilowatt hours per year, or 0.28 gigawatt hours per year. In 2018, the total electricity demand for San Diego County was 19,045 gigawatt hours (CEC 2020).

The proposed project would be required to meet the California Building Energy Efficiency Standards (24 CCR 6), which improve the energy efficiency of residential and nonresidential buildings. In addition, the project would be subject to statewide mandatory energy requirements as outlined in Title 24, Part 6, of the California Code of Regulations. Title 24, Part 11, contains voluntary energy measures that are applicable to the proposed project under CALGreen. Prior to project approval, the City would ensure that the project meets Title 24 requirements applicable at that time, as required by state regulations through their plan review process. The project would comply with applicable laws and regulations and would not use excess energy or require major improvements to local infrastructure for operation.

Natural Gas

Construction Use

Natural gas is not anticipated to be required during project construction. However, any minor amounts of natural gas that may be consumed as a result of project construction would be minimal and would have a negligible contribution to the proposed project's overall energy consumption.

Operational Use

With the implementation of PDF-AQ-2, no natural gas will be utilized for the operation of the project.

Petroleum

Construction Use

Petroleum would be consumed throughout the construction of the proposed project. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction, and vehicle miles traveled associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. Heavy-duty construction equipment associated with construction activities and haul trucks involved in relocating dirt around the project site would rely on diesel fuel. Construction workers would travel to and from the project site throughout the duration of construction. It is assumed that construction workers would travel to and from the project site in gasoline-powered vehicles.

Fuel consumption from construction equipment was estimated by converting the total emissions from each construction phase to gallons using conversion factors for carbon dioxide to gallons of gasoline or diesel. The proposed project is estimated to consume approximately 233,317 gallons of petroleum during the construction phase. In 2023, the total petroleum consumption within the County of San Diego was 1.55 billion gallons (CARB 2023). The petroleum required for construction of the project is minimal compared to the overall County usage. Petroleum use for the construction of the proposed project would not be excessive and would not require new or major local infrastructure improvements.

Operational Use

The majority of fuel consumption resulting from the project's operational phase would be attributable to employees, visitors, and residents traveling to and from the project site. Mobile sources from the proposed project would result in approximately 182,848 gallons of gasoline per year and 7,863 gallons of diesel per year, for a total of 190,711 gallons of petroleum consumed per year beginning in 2027 after the project buildout. It is forecasted that in 2027, approximately 1.44 billion gallons of petroleum in San Diego County will be consumed (CARB 2023). The petroleum required for the operation of the project is minimal compared to the overall County usage. Similar to construction, petroleum use for the operation of the proposed project would not be excessive and would not require new or major local infrastructure improvements.

Significance of Impact

Electricity

The electricity used for construction activities and operations would not be excessive or require major improvements to local infrastructure, and impacts would be less than significant.

Natural Gas

Minor amounts of natural gas would be used during project construction, and no natural gas would be used for the proposed project's operation. The project impacts would be less than significant.

Petroleum

Although the proposed project construction activities and future residents would utilize petroleum, the use would be a small fraction of the countywide use and would result in a less than significant impact.

Mitigation Measures

As impacts would be less than significant, no mitigation measures would be required.

5.15.3.3 Issues 4 and 5: Water

Issue 4: Would the Project result in the use of excessive amounts of water?

Issue 5: Does the project propose landscaping which is predominantly non-drought resistant vegetation?

Thresholds

According to the City's Significance Determination Thresholds (City of San Diego 2022c), public utility impacts related to water use would be significant if a project would:

- Water Supply – Result in the need to comply with SB 610 to determine the availability of water to meet the projected water demands of the project for a 20-year planning horizon, including single and multiple dry years The types of projects subject to SB 610 include the following:
    - Residential developments with more than 500 units;
    - Shopping centers or businesses employing more than 1,000 people or having more than 500,000 square feet of floor space;

  - Commercial office buildings employing more than 1,000 people or having more than 250,000 square feet of floor space;
  - Mixed use projects that include one or more of the projects listed above; or
  - Projects that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project.
- Water Conservation
  - Use an excessive amount of potable water; or
  - Propose predominantly non-drought resistant landscaping and excessive water usage for irrigation and other purposes.

Impact Analysis

Water Supply

The water demand and corresponding proposed public water facility analysis was developed in accordance with Book 2 of the City of San Diego Design Guidelines and Standards. Residential water demand is estimated based on population and a water demand of 150 gpd per person.

Table 5.15-2, above, provides the estimated average water demand associated with the proposed project.

Based on the City of San Diego Guidelines and Standards, the projected average water use associated with the project is estimated to be 57,900 gpd. The project would result in an estimated maximum demand of 69.8 gpm. The City's PUD service area total water demand forecast for 2025 is 202,685 AFY, or 125,656.58 gpm (City of San Diego 2021a). The project's estimated maximum day demand of 69.8 gpm and the estimated peak hour demand of 209.5 gpm aligns with the City's forecasted water demand and would not require the construction of new or expanded public utilities needed to serve the project.

As concluded in Appendix M1, the maximum static pressure within the project would range between a low of 52 psi and a high of 73 psi, which is marginally below the City's design criteria range from 65 psi to 120 psi. The proposed public water system can deliver 1,500 gpm of fire flow under the maximum daily demand condition within the single-family area of the project, 1,900 gpm for the multi-family site, and 1,500 gpm fire flow. This project does not exceed the threshold set by the City of San Diego for water supply, as it proposes the development of less than 500 dwelling units and would not be expected to use the equivalent water supply of a 500-dwelling unit development.

Water Conservation

The proposed project would incorporate water sustainable water-sustainable design features, techniques, and materials that would reduce water consumption. These sustainability measures as they pertain to water resources include high-efficiency plumbing fixtures and fittings in all structures and the use of recycled water instead of potable water for irrigation for outdoor water use. The implementation of a potable/recycled water supply system for outdoor water use would be included as a project design feature, PDF-UTIL-2. The project applicant has committed to implement these water conservation standards into the design of the new residences and other infrastructure that would be constructed as part of the proposed project.

Significance of Impact

Water Supply

The project would be consistent with regional water resource planning and applicable water supply regulations. There would be sufficient water supply to meet the projected demands of the project; therefore, impacts related to potable water supplies/demand from project implementation would be less than significant.

Water Conservation

The project would incorporate water sustainable features into the project design. Overall, the project would be consistent with applicable water conservation requirements; therefore, impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation measures would be required.

5.16 TRIBAL CULTURAL RESOURCES

This section describes the existing physical conditions and cultural context of the proposed Renzulli Estates Project (project) site, identifies associated regulatory requirements, and evaluates potential impacts related to the implementation of the project. The following discussion is based on the Negative Cultural Resources Letter Report for the Renzulli Estates Project prepared by Dudek (October 2023) and included as Appendix H of this environmental impact report (EIR). Additionally, the analysis is based on consultation with Native American tribes traditionally and culturally affiliated with the project area who have requested consultation pursuant to California Public Resources Code (PRC), Section 21080.3.

5.16.1 EXISTING CONDITIONS

Existing Physical Conditions

The majority of the project site is undeveloped, with the exception of an existing large residence, several outbuildings, and two associated sheds. The project site is surrounded by disturbed habitat, existing residential development, open space, and Cypress Canyon Park to the east of the project site.

Ethnographic, Religious, and Cultural Context

Many areas of San Diego County, including its mesas and the coast, are known for intense and diverse prehistoric occupation and important archaeological and historical resources. The pre-contact cultural sequences are locally characterized by the material culture recovered during archaeological investigations from as early as the 1920s, as well as through early accounts of Native American life in San Diego, recorded as a means to salvage scientific knowledge of native lifeways. Additional information of Native American lifeways comes from the Kumeyaay themselves, from the stories and songs passed down through the generations in their own words. According to ethnographies based on interviews with local tribal elders, there are hundreds of words that describe a given landform, showing a close connection with nature. There are also stories associated with the land.

As recognized in 2001 by State Assembly Joint Resolution No. 60, the Kumeyaay Nation has occupied the Southern California and Baja California region, including the City of San Diego (City) and the project area of potential effects. The Kumeyaay are the identified most likely descendants (MLDs) for all Native American human remains found in the City.

Native American Heritage Commission Sacred Lands File

Dudek requested a Native American Heritage Commission (NAHC) search of its Sacred Lands File on September 13, 2021, for the project site. On October 14, 2021, the NAHC provided the results of the Sacred Lands File search. The search identified no previously recorded cultural resources for the project.

Tribal Correspondence

Dudek sent correspondence letters on November 11, 2021, to the listed tribal representatives provided by the NAHC, requesting information, opinions, or concerns relating to project impacts. These correspondence letters contained a brief description of the project, a reference map, and a summary of the NAHC Sacred Lands File and South Coastal Information Center search results.

The government-to-government consultation with Native American tribes under Assembly Bill (AB) 52 was initiated and letters were sent on May 3, 2022, to tribes interested in notification of the project including Iipay Nation of Santa Ysabel, Jamul Indian Village, and San Pasqual Band of Diegueno Mission Indians. No responses have been received from the tribes.

The government-to-government consultation with Native American tribes under Senate Bill 18 was initiated and letters were sent for the 90-day notice on June 17, 2025. To date, responses have been received from the Viejas Band of Kumeyaay Indians and the Barona Band of Mission Indians. The Viejas Band reviewed the proposed project and determined that the project site has cultural significance or ties to Viejas. They requested that a Kumeyaay Cultural Monitor be on site for ground-disturbing activities and that City staff keep them informed of any new developments, such as inadvertent discovery of cultural artifacts, cremation sites, or human remains. No tribal cultural resources were identified on the site. The Barona Band originally requested consultation regarding the project and asked to see a standard cultural resources report from a qualified archaeologist. After City staff shared the requested cultural resources report, staff received a response from the Barona Band indicating that in view of the report's contents and conclusions, they were withdrawing their request for further consultation. City staff will continue to keep all local Native American tribes updated regarding the status of this project via the future 45-day and 10-day Senate Bill 18 notices.

5.16.2 REGULATORY FRAMEWORK

Federal

United States Code, Title 25, Sections 3001 et seq.

The Native American Graves Protection and Repatriation Act is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items, such as human remains, funerary objects, sacred objects, or objects of cultural patrimony, to lineal descendants and culturally affiliated Indian tribes.

National Historic Preservation Act of 1966 and National Register of Historic Places

The National Register of Historic Places (NRHP) is the official list of the nation's historic places worthy of preservation. The NHRP, as authorized by the National Historic Preservation Act of 1966, is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archaeological resources. Once listed in the NRHP, a resource or property is officially recognized as historically significant to the nation, the state, or the community. Properties listed (or potentially eligible for listing) in the NRHP must meet certain significance criteria and possess integrity of form, location, or setting. Barring exceptional circumstances, resources generally must be at least 50 years old to be considered for listing in the NRHP.

Criteria for listing in the NRHP are stated in the Code of Federal Regulations (36 CFR 60). A resource may qualify for listing if there is quality of significance in American history, architecture, archaeology, engineering, and culture present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and where such resources:

1. Are associated with events that have made a significant contribution to the broad patterns of history.
2. Are associated with the lives of persons significant in the past.
3. Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.
4. Have yielded, or may be likely to yield, information important in prehistory or history.

Eligible properties must meet at least one of the NRHP criteria and exhibit integrity, measured by the degree to which the resource retains its historical properties and conveys its historical character, the degree to which the original historic fabric has been retained, and the reversibility of changes to

the property. The fourth criterion is typically reserved for archaeological and paleontological resources.

State

California Register of Historical Resources (California Public Resources Code, Section 5020 et seq.)

In California, the term "cultural resource" includes but is not limited to "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (PRC Section 5020.1[j]). In 1992, the California legislature established the California Register of Historical Resources (CRHR) "to be used by state and local agencies, private groups, and citizens to identify the state's cultural resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). A resource is eligible for listing in the CRHR if the State Cultural Resources Commission determines that it is a significant resource and that it meets any of the following NRHP criteria (PRC Section 5024.1[c]):

1. Associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Associated with the lives of persons important in our past.
3. 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.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

Resources less than 50 years old are not considered for listing in the CRHR but may be considered if it can be demonstrated that sufficient time has passed to understand the historical importance of the resource (see 14 CCR 4852[d][2]).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing on the NRHP are automatically listed on the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local cultural resource surveys. The State Historic Preservation Office maintains the CRHR.

Native American Historic Cultural Sites (California Public Resources Code, Section 5097 et seq.)

The Native American Historic Resources Protection Act (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; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the NAHC to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resources Protection Act makes it a misdemeanor punishable by up to 1 year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR.

California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act, enacted in 2001, requires all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. The act also provides a process for the identification and repatriation of these items to the culturally affiliated tribes.

California Health and Safety Code, Section 7050.5

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and 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 Health and Safety Code, Section 7050.5b). If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the NAHC within 24 hours (California Health and Safety Code, Section 7050.5c). The NAHC will notify the MLD. With the permission of the landowner, the MLD may inspect the site of discovery. The inspection must be completed within 24 hours of NAHC's notification of the MLD. The MLD may recommend means of treating or disposing of, with appropriate dignity, the human remains, and items associated with Native Americans.

California Environmental Quality Act

The following California Environmental Quality Act (CEQA) statutes and CEQA Guidelines are relevant to the analysis of historic, archaeological and tribal cultural resources (TCRs):

1. PRC Section 21083.2(g): Defines "unique archaeological resource."
2. PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a): Defines cultural resources. In addition, CEQA Guidelines Section 15064.5(b) defines the phrase "substantial adverse change" in the significance of a cultural resource. It also defines the circumstances when a project would materially impair the significance of a cultural resource.
3. PRC Section 21074(a): defines "Tribal cultural resources" and Section 21074(b): defines a "cultural landscape."
4. PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e): These statutes set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
5. PRC Sections 21083.2(b)-(c) and CEQA Guidelines Section 15126.4: These statutes and regulations provide information regarding the mitigation framework for archaeological and historic resources, including options of preservation-in-place mitigation measures; identifies preservation-in-place as the preferred manner of mitigating impacts to significant archaeological sites.

Under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (PRC Section 21084.1; 14 CCR 15064.5[b]). A "historical resource" is any site listed or eligible for listing in the CRHR. The CRHR listing criteria (14 CCR 15064.5[a][3]) are intended to examine whether the resource in question meets any of the NRHP criteria (PRC Section 5024.1[c]) as identified above.

The term "historical resource" also includes any site described in a local register of historical resources or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1[g]).

All historical resources and unique archaeological resources—as defined by statute—are presumed to be historically or culturally significant for purposes of CEQA (PRC Section 21084.1; 14 CCR Section 15064.5[a]). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (PRC Section 21084.1; 14 CCR Section 15064.5[a]). A site or resource that does not meet the definition of "historical resource" or "unique archaeological resource" is not considered significant under CEQA and need not be analyzed further (PRC Section 21083.2[a]; 14 CCR Section15064.5[c][4]).

Pursuant to these sections, CEQA first advises an evaluation of whether a project site contains any historical resources, then an assessment of whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource's historical significance is materially impaired.

When a project significantly affects a unique archaeological resource, CEQA imposes special mitigation requirements.

Finally, CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are set forth in PRC Section 5097.98.

Assembly Bill 52

AB 52, the Native American Historic Resource Protection Act, sets forth a proactive approach intended to reduce the potential for delay and conflicts between Native American and development interests. Under AB 52, a TCR is defined as a site, feature, place, cultural landscape (must be geographically defined in terms of size and scope), sacred place, or object with cultural value to a California Native American tribe that is either included or eligible for inclusion in the CRHR or included in a local register of historical resources. A Native American tribe or the lead agency, supported by substantial evidence, may choose at its discretion to treat a resource as a TCR. AB 52 also mandates that lead agencies consult with tribes, if requested by the tribe, and sets the principles for conducting and concluding consultation.

Senate Bill 18

California Senate Bill 18, which took effect on March 1, 2005, requires local (city and county) governments to consult with California Native American tribes identified by the NAHC for the purpose of protecting and/or mitigating impacts to cultural places in creating or amending general plans, including specific plans (Government Code Section 65352.3).

5.16.3 IMPACTS ANALYSIS

5.16.3.1 Issue 1: Tribal Cultural Resource Significant Adverse Change

Issue 1: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

Thresholds

The City has not yet developed thresholds of significance for potential impacts to TCRs. Therefore, for purposes of this EIR, guidance provided by issue questions listed in CEQA Appendix G are utilized to evaluate the potential for significant impacts to TCRs. The project would have a significant impact on TCRs if the project would:

- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

  a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).

  b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Impact Analysis

TCRs include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Native American tribe. TCRs include "non-unique archaeological resources" that, instead of being important for "scientific" value as a resource, can also be significant because of the sacred and/or cultural tribal value of the resource. Tribal representatives are considered experts in providing substantial evidence regarding the locations, types, and significance of TCRs within their traditionally and cultural affiliated geographic area (PRC Section 21080.3.1[a]).

The South Coastal Information Center records indicate that no previously recorded cultural resources are located within the project area of potential effects. The South Coastal Information Center records also indicate that 20 cultural resources have been previously recorded within the 1-mile buffer area search radius. Of the total 20 resources identified in the 1-mile buffer, 9 are prehistoric resources, 5 are historic resources, and 6 are prehistoric isolates. The Negative Cultural Resources Letter Report for the Renzulli Estates Project (Appendix H) indicates that there is low sensitivity for identifying intact subsurface archaeological deposits during project implementation based on the lack of prehistoric and cultural material at the site, as well as the disturbance from previous grading activities on site associated with the existing residence. The NAHC Sacred Lands File search did not identify any cultural resources on the project site and an intensive pedestrian survey did not identify any archeological resources on site. Additionally, the project site has not been recommended for historic designation and is not identified on any of the historic resource lists/databases—the NRHP, California State Historical Landmarks, Points of Historical Interest, and CRHR. Outreach letters were sent to tribes identified by NAHC on November 11, 2021, and government-to-government consultation initiation letters under AB 52 were sent on May 3, 2022. No responses have been received from the tribes. Thus, it is unlikely the project would result in impacts to TCRs.

Significance of Impact

No TCRs have been previously identified within the project site and no impacts to such resources would occur; impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation measures would be required.

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5.17 VISUAL EFFECTS/NEIGHBORHOOD CHARACTER

This section describes the existing visual conditions of the proposed Renzulli Estates Project (project) site, identifies associated regulatory requirements, and evaluates potential impacts related to the implementation of the project.

5.17.1 EXISTING CONDITIONS

Existing Physical Conditions

The project site is located within the Scripps Miramar Ranch Community Plan (Community Plan) Area. The existing visual environment of the Community Plan Area consists of open space and built features, including residential, commercial, and industrial development, schools, parks, and roads. The City of San Diego (City), including the Scripps Miramar Ranch community, is considered an urbanized area per California Environmental Quality Act (CEQA) Section 21071.

Currently, the majority of the project site is undeveloped with native and non-native vegetation, which includes grasses, small shrubs, and medium to large trees. The majority of the site consists of steep slopes and two lowland canyon bottoms. The City defines a site as containing steep hillsides when it includes a natural gradient of at least 25% and a vertical elevation of at least 50 feet. The project site supports a large existing residence, several outbuildings, and two associated sheds, all of which are located atop a tall and steep ridge that is mostly centrally located within the boundaries of the project site. There is also a cleared, paved area in the center of the site; see Figure 5.1-1, Surrounding Land Uses. Finally, there is an additional large metal building (approximately 5,000 square feet) located on a cleared and flattened ridge to the north and approximately 90 feet lower in elevation than the main house.

The project site is surrounded by existing residential development that is mostly single-family to the north, west, and northeast; multifamily residential development to the southeast; undeveloped open space (including a canyon and intermittent creek) to the south; and Cypress Canyon Park to the east (see Figure 5.1-1). Additional open space areas are intermixed throughout the single-family residential developments that generally surround the project site. In addition to Cypress Canyon Park (directly east of the project site), recreational facilities including Scripps Ranch Community Park (approximately 0.45 miles west of the project site) and the Cypress Valley Tot Lot/Playground (approximately 0.22 miles southwest of the project site) are in the surrounding area. Lastly, St. Gregory the Great Catholic Church is beyond the nearby residential and open space uses, approximately 0.35 miles west of the project site.

Existing Landforms

Valued natural resources of the Scripps Miramar Ranch community include hills, trees, water resources, Miramar Reservoir, Carroll Canyon, and subsidiary canyons (Scripps Miramar Ranch Planning Committee et al. 2018).

Topography varies greatly throughout the project site and the surrounding area, but is generally steep and hilly, with lowland canyon bottoms in the southern and northern portion of the project site; these areas receive much of the runoff from the surrounding hills and support wetland vegetation or drainages. The project site is characterized by a central flat, developed ridge area with steep descending slopes that abut canyons to the north and south. On-site elevations range approximately 980 feet above mean sea level at the peak hill near the center of the site, to a low of approximately 760 feet above mean sea level at the canyon along the northern boundary and south of Treadwell Drive.

Scenic Highways

According to the California Department of Transportation Scenic Highway Mapping System, the project site is not located adjacent to, or in the vicinity of, a designated state scenic highway (Caltrans 2018). The nearest state scenic highway, a portion of State Route 52 (an officially designated scenic highway), is approximately 4.8 miles south of the project site. Due to distance and intervening terrain, the project site is not visible from State Route 52 or any other state scenic highway in San Diego County.

Community and Neighborhood Character

To aid in the following description of the project site and surrounding area, a photographic inventory of portions of the site and surrounding area was conducted on August 25, 2020, and September 29, 2021. Conditions were sunny and clear during each site inventory, and photographs were taken with an iPhone 8 and iPhone XS. A map of the photographs referenced in the discussion below is provided as Figure 5.17-1, Existing Visual Character Key Map.

Project Site

Existing elements on the project site are shown in a series of photos presented in Figure 5.17-2, Existing Visual Character: Project Site. As shown in this figure, the 40.56-acre site is primarily undeveloped land (38.22 acres) with the central area of the site partially developed (2.34 acres) with a single-family residence.

The undeveloped portion of the project site consists of undeveloped slopes with dense to moderately vegetated land covers, including relatively low and mounded coastal sage scrub, mixed chaparral, and scrub oak chaparral (see Photos A and D in Figure 5.17-2). Eucalyptus woodland areas supporting tall trees are also present throughout the project site, mainly in the central area near the existing single-family residence (see Photos B and C in Figure 5.17-2) and in the southwest portion of the project site, south of the existing wetlands (see Photo A in Figure 5.17-2). The densities and types of on-site vegetation are illustrated in Figure 5.17-2. On-site vegetation varies in height and is generally denser in the northern portions of the site (see Photo D in Figure 5.17-2) and becomes thinner and more disturbed in the center portions, near the existing residential development, and along the western slope (see Photo B in Figure 5.17-2).

A generally flat mesa exists in the center of the parcel, where the existing main residence is located. The main residence is a Spanish-style two-story home with terracotta roofing and white stucco. The residence is rectangular and features a central open courtyard. This area of the project site has been heavily disturbed and includes two three-car garages and various abandoned vehicles, RVs, and trailers (see Photo C in Figure 5.17-2). Two existing sheds associated with the existing residential development are located to the north and northwest of the existing residence. In addition, there is a large, paved area in the center of the project site, directly northeast of the existing residence. Several trees are scattered throughout the project site, including tall and unmaintained ornamental trees surrounding the existing on-site development. Lastly, various unpaved roads are currently scattered throughout the site, particularly along the southeast-facing slopes near the existing residence. Formal access to the site is provided from a paved driveway off Cypress Canyon Road near the southeast corner of the project site. A locked gate is located at the base of the driveway and controls unauthorized vehicle access.

Surrounding Area

The project site is surrounded by residential development to the north, west, northeast, and southeast; undeveloped open space (including a canyon and intermittent creek) to the south; and Cypress Canyon Park to the east.

Existing residential development surrounding the project site includes single-family homes immediately to the north, east, and west, as well as further south past Spring Canyon Road. Multifamily homes are located southeast of the project site. The surrounding single-family residences to the north of the project site are largely two stories and consist largely of neutral and light-colored stucco exterior with red roofs; some of these existing residences feature rooftop solar panels (see Photo H in Figure 5.17-3, Existing Visual Character: Surrounding Area). Served by two-lane neighborhood roads, these homes back up to the project site. Residences to the northeast of the project site feature light-colored stucco exteriors and gray-colored roofs and tile shingles.

Similar to development to the north and northeast, residential development to the west of the project site is largely two stories and features light-colored stucco exteriors. Roof colors include various shades of red and some gray tile shingles. The homes to the north, northeast, and west of the site typically have small, grass (or artificial turf) covered front yards with low shrubs and/or tall trees.

To the southeast of the project site, the multifamily residences are largely two stories and consist of light-colored stucco clad structures with red roofs and garages. While shrubs and trees are featured throughout the multifamily development, artificial turf is generally uncommon in these areas.

Open space areas border the project site immediately to the south and east side of the site as part of Cypress Canyon Park. The open space area south of the project site features rugged drag vegetation and tall trees, which screen the project site from Spring Canyon Road to the south. The open space east of the project site ranges in elevation from approximately 930 feet to the west to approximately 850 feet to the east, where it meets with Cypress Canyon Park. The existing slope features moderately dense, drab vegetation and provides a buffer between the project site and Cypress Canyon Park to the east.

Lastly, Cypress Canyon Park is located east of the site and features four baseball diamonds separated by large grass fields and surrounded by large trees (see Photo G in Figure 5.17-3). Additional amenities include a tennis court and surface parking lot to the southwest and various pathways that surround the existing tennis court and park.

Scenic Resources and Vistas

A scenic vista is typically defined as a panoramic view or vista from an identified view/vista point, public road, public trail, public recreational area, or scenic highway. The Community Plan (Scripps Miramar Ranch Planning Committee et al. 2018) identifies specific natural resources in the Scripps Miramar Ranch community (e.g., hills, trees, water resources, Miramar Reservoir, Carroll Canyon, and subsidiary canyons). These views are not specifically identified as scenic vistas; however, the Community Plan states that views of these resources should be preserved. Miramar Reservoir and Caroll Canyon are not within the same viewshed as the project site due to distance and intervening features (terrain, development, vegetation), and as such, these resources are not further discussed. As described above, the project site includes hills, lowland canyon bottoms, drainages, and trees that are considered natural resources with visual resource value per the Community Plan.

The majority of the project site has limited visibility from public viewing locations due to intervening features (e.g., terrain and vegetation) between the project site and public vantage points. Portions of the site are, however, visible from surrounding public roadways including Cypress Canyon Park Road, Cypress Canyon Road, Spring Canyon Road, Cypress Valley Drive, and Mundial Street. In

addition, the project site is visible from nearby Cypress Canyon Park. As further described below, the on-site hilly and canyon terrain, as well as ridgeline trees present on the project site, are visible to varying degrees from these roadways and from Cypress Canyon Park.

Additional public locations providing available views to the project site include Sabre Springs Open Space and Black Mountain Open Space Park. Both open space areas are located outside of the Community Plan boundary. Traversed by a network of public pedestrian/hiking trails, Sabre Springs Open Space traverses lands located in San Diego and Poway (the open space area is approximately 1.6 miles away from the project site). Views toward the project site are available from south and southeast-facing slope areas and ridgelines in Sabre Springs Open Space. Black Mountain Open Space Park is located further north of Sabre Springs Open Space, in the City's Rancho Peñasquitos community. Black Mountain Open Space Park provides several public trails including a relatively steep trail to the 1,554-foot summit of Black Mountain (the summit of Black Mountain is located 4.85 miles from the project site).

Views of the Project Site

To aid in the following discussion of available views to the project site from select roadways and Cypress Canyon Park, a photographic inventory was conducted on January 23, 2025. Conditions were sunny and clear and photographs were taken with an iPhone 12. A map of the photographs referenced in the discussion below is provided as Figure 5.17-4, Off-Site Views Photo Location Key Map. Photos from selected roadways and Cypress Canyon Park are presented in Figures 5.17-5 through 5.17-10.

Cypress Canyon Park Drive

Elements of the project site including north-facing naturally vegetated and thinned hillsides, existing low-profile structures, and ridgeline eucalyptus trees are within the viewshed of westbound Cypress Canyon Park Drive from approximately Cypress Terrace Place to Candy Rose Way (a distance of approximately 675 feet). Along this segment of Cypress Canyon Park Drive, the project site is located in the peripheral view of motorists/road users; however, views to existing on-site resources, including densely vegetated north-facing slopes, a low undulating ridgeline in the central area of the project site, and several mature ridgeline eucalyptus trees, are relatively clear and free from obstructions (see Photo A in Figure 5.17-5, Cypress Canyon Park Drive Views). Near Candy Rose Way, the project site becomes increasingly blocked by mature trees located on residential lots situated to the immediate south of Cypress Canyon Park Drive (see Photo B in Figure 5.17-5). Further views

toward the project site from locations east of Candy Road Way are similarly blocked by private yard landscaping (trees) and by two-story homes located south along Cypress Canyon Park Drive.

Considering that the available view from Cypress Canyon Park Drive towards the project site is not panoramic in nature and is short in length/depth (i.e., does not extend beyond the project site located within 500 feet of the roadway), this view is not a scenic vista. The scenic resources visible from this location include the natural hill and canyon terrain and the mature eucalyptus trees atop a ridgeline portion of the project site.

Cypress Canyon Road

West of Cypress Canyon Park, existing views to the project site from westbound Cypress Canyon Road are mostly blocked or partially screened by mature trees south of the road and by the small stand of mature eucalyptus and other trees in the southwestern corner of the Cypress Canyon Park property (see Photo C in Figure 5.17-6, Cypress Canyon Road Views). However, the southeastern corner of the project site is visible near the bulbed western terminus of Cypress Canyon Road, which ends in a locked gate at the existing driveway to the project site. Specifically, existing views of the project site from the western end of Cypress Canyon Road include a chain-link fence and gate installed at the paved driveway leading to the flat, ridged portion of the project site and vegetated east-facing slope. Several eucalyptus trees in the southeastern corner of the project site and the crowns of several eucalyptus trees located atop the flat, ridged portion of the project site are also visible from the western end of Cypress Canyon Road (see Photo D in Figure 5.17-6).

The available views from Cypress Canyon Road towards the project site are not panoramic in nature, are short in length/depth (i.e., do not extend beyond the project site), and are frequently blocked by mature trees installed adjacent to the road. Considering these variables, the views from Cypress Canyon Road towards the project site are not scenic vistas. The scenic resources visible from this location include the natural hill terrain, the mature eucalyptus trees planted along the road, and visible lands to the west and northwest of the road (including on visible portions of the project site). See Photos C and D on Figure 5.17-6.

Spring Canyon Road

From westbound Spring Canyon Road between Pomerado Road and Riesling Drive (a distance of approximately 1,700 feet), the project site is mostly blocked or partially screened from view by shrubs and mature trees, including the dense grove of mature eucalyptus located to the immediate north of this segment of Spring Canyon Road (see Photo E in Figure 5.17-7, Spring Canyon Road Views). Gaps in trees to the south of the road occasionally allow for small “windows” through which the elevated ridge in the eastern portion of the project site is distant but detectable (see Photo F in Figure 5.17-7). Brief, partially obstructed views of the project site (primarily mounded ridge terrain

and a flatter portion of the ridge terrain featuring several mature eucalyptus trees and a single-family residence) are available from westbound Spring Canyon Drive from the City water reservoir driveway to approximately Riesling Drive (a distance of approximately 550 feet) (see Photo G in Figure 5.17-7). Along this segment, mature eucalyptus trees and partially screened exteriors of the single-family residence in the central, ridgeline portion of the project site are in the peripheral view of road users.

The project site and more distant landscape features are routinely blocked (or partially blocked) from view by mature eucalyptus and other tree species that are planted along the corridor. While the trees reduce the potential for panoramic views, gaps in planted tree clusters occasionally allow for longer distance views that extend to the higher elevation portions of the project site and to mountainous terrain to the northeast. See Photos F and G on Figure 5.17-7. Although these available views are mobile and experienced briefly by road users (it should also be noted that the view captured in Photo G (Figure 5.17-7) exaggerates the visibility of distant mountain terrain as the photo is taken from the wide right-of-way and not Spring Canyon Road travel lanes), longer-distance views available from Spring Canyon Road are scenic and the resources visible from the road include mature eucalyptus trees installed along the road, lands to the immediate north of the road and on the ridgeline portion of the project site, and hill and mountain terrain.

Cypress Valley Drive

Prior to arriving at the eastern terminus of Cypress Valley Drive, views to the shrub-covered, west-facing slopes in the western portion of the project site and mature eucalyptus trees near the single-family residence in the central, ridgeline portion of the project site are partially blocked by single-family residences and private yard trees installed along Cypress Valley Drive (see Photo H in Figure 5.17-8, Cypress Valley Drive Views). Existing views of the project site from the eastern terminus of Cypress Valley Drive are mostly composed of the broad, southwest facing hillside covered with low shrubs located on the western boundary of the project site. Numerous mature eucalyptus trees on the project site are also visible from this particular vantage point at the end of Cypress Valley Drive (see Photo I in Figure 5.17-8). In addition, views to the dense grove of mature eucalyptus covering the slopes to the south of the project site are also visible from the eastern terminus of Cypress Valley Drive (see Photo J in Figure 5.17-8).

Considering that the available view from Cypress Valley Drive towards the project site is not panoramic in nature and is short in length/depth (i.e., does not extend beyond the mounded hill terrain underlying the eastern and central portion of the project site or lands to the immediate south that support a dense grove of mature eucalyptus trees; see Photos I and J on Figure 5.17-8), this view is not a scenic vista. The scenic resources visible from this location include the natural hill

and canyon terrain and the mature eucalyptus trees on the project site and on adjacent lands to the immediate south.

Mundial Street

Mundial Street is a short, approximately 400-foot-long residential street connecting to Cypress Canyon Park Drive and ending at a fenced terminus that abuts the northern boundary of the project site. Portions of the project site's densely vegetated north-facing slope are visible from the entire length of the street and, while views near the end of the road are more focused and limited in length due to the proximity of the site's north-facing slope, near Cypress Canyon Park Drive, the project site's central ridgeline, the terra cotta roof of the existing residence, and several eucalyptus trees atop the central ridge area of the site are visible (see Photo K in Figure 5.17-9, Mundial Street Views).

Considering that the available south-oriented view from Mundial Street towards the project site is not panoramic in nature and is short in length/depth (i.e., does not extend beyond the elevated slope and ridgeline terrain present in the foreground; see Figure 5.17-9), this view is not a scenic vista. The scenic resources visible from this location include the natural hill and ridgeline terrain and the mature eucalyptus trees on the ridgeline portion of the project site.

Cypress Canyon Park

Existing views of the project site from Cypress Canyon Park (specifically, from the circular path along the perimeter of the park's grass fields) are partially blocked by mature eucalyptus trees installed in the western portion of the park property. Project site views are limited to the elevated ridge in the eastern portion of the site and descending terrain to the south and north (see Photo L in Figure 5.17-10, Cypress Canyon Park Views). The central ridge area of the project site, including the existing single-family residence and collection of mature eucalyptus trees, is blocked from view by intervening terrain from most segments of the park's perimeter trail. However, the crowns of two eucalyptus trees in the central ridge portion of the project site are partially visible from a short segment of the perimeter trail in the northwestern corner of the park (see Photo M in Figure 5.17-10).

Considering that the available views from Cypress Canyon Park towards the project site are not panoramic in nature and are short in length/depth (i.e., do not extend beyond the elevated slope and ridgeline terrain present in the foreground; see Figure 5.17-10), this view is not a scenic vista.

The scenic resources visible from this location include the natural hill terrain and the mature eucalyptus trees on the ridgeline portion of the project site.

Sabre Springs Open Space

While the project site is within the viewshed of public trails within Sabre Springs Open Space (a natural open space area with public trails located approximately 1.6 miles north of the project site), available views from trails are panoramic and broad, stretching beyond the project site and towards mountainous terrain on more distant Marine Corps Air Station Miramar and in Mission Trails Regional Park. The project site is included in views from the open space area, but on-site resources including hillsides and mature eucalyptus trees lack distinction due to distance and the presence of similar features throughout the available view. While this is a significant scenic vista due to its expansive view that includes scenic resources, the project site does not substantially contribute scenic value to this view considering that due to distance, the project site is not clearly visible in views from the various trails in Sabre Springs Open Space. Further, and due to the presence of other hill and canyon areas near the project site supporting a similar assemblage of vegetation, the project site is not particularly distinct in the available views from Sabre Springs Open Space.

Black Mountain Open Space Park

The project site may be visible from Black Mountain Open Space Park, but on-site resources are not particularly distinct due to intervening terrain (including Sabre Springs Open Space, located to the southeast of Black Mountain Open Space Park), distance, and the presence of similar terrain and vegetation in the immediate surrounding area. While this is a significant scenic vista due to its expansive view that includes scenic resources, the project site does not substantially contribute scenic value to this view considering that due to distance, the project site is not clearly visible in views from the various trails in Black Mountain Open Space Park. Further, and due to the presence of other hill and canyon areas near the project site supporting a similar assemblage of vegetation, the project site is not particularly distinct in the available views from Black Mountain Open Space Park.

Light and Glare Conditions

The project site is predominately undeveloped; therefore, sources of existing light and glare are limited to the existing single-family residence and associated structures.

Adjacent residential development contains lighting sources typical of residential development, including interior lighting emanating through windows, outdoor lighting fixtures on structures, and streetlights. Cypress Canyon Park, located southeast of the site, contains lighting sources including field light poles, basketball court lights, and overhead parking lot lighting. While the area immediately south of the project site is undeveloped land with no light sources, development

located further south, south of Spring Canyon Road, contains lighting sources from the existing residential uses (e.g., interior lighting, outdoor lighting fixtures, streetlights). Residences to the south of Spring Canyon Road are located approximately 0.1 miles to the south of the project site.

5.17.2 REGULATORY FRAMEWORK

Local

City of San Diego General Plan

Urban Design Element

The Urban Design Element of the City of San Diego General Plan (General Plan) contains goals, recommendations, and urban design objectives that relate to visual issues and community and neighborhood character. The stated purpose of the Urban Design Element is to guide physical development toward a desired scale and character that is consistent with the social, economic, and aesthetic values of the City (City of San Diego 2028). The Urban Design Element defines community and neighborhood character as the visual and sensory relationship between people and the built and natural environment. The Urban Design Element identifies several goals and policies to help guide compact, efficient, and environmentally sensitive patterns of development. Goals and policies contained in the Urban Design Element that relate to visual effects and neighborhood character are identified below.

General Urban Design Policies

Policy UD-A.5: Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.

Policy UD-A.6: Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.

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.

Policy UD-A.11: Encourage the use of underground or above-ground parking structures, rather than surface parking lots, to reduce land area devoted to parking.

Policy UD-A.12: Reduce the amount and visual impact of surface parking lots.

Policy UD-A.14: Design project signage to effectively utilize sign area and complement the character of the structure and setting.

Distinctive Neighborhoods and Residential Design Policies

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.

Scripps Miramar Ranch Community Plan

The Transportation; Design; and Parks, Recreation, and Open Space Elements of the Community Plan contain goals, objectives, guidelines, and proposals to guide development within the Community Plan Area (Scripps Miramar Ranch Planning Committee et al. 2018). The purpose of the Community Environment Element is to ensure a desirable, healthful, and comfortable living and working environment for Scripps Miramar Ranch while preserving the community's valuable natural resources and amenities. Additionally, the purpose of the Design Element is to ensure that future development within Scripps Miramar Ranch would promote a positive community identity, allow for reasonable freedom of design expression, and maintain the character of the existing development. Further, the Parks, Recreation and Open Space Element aims to provide a well-balanced and aesthetically pleasing system of open space and recreational facilities and other opportunities.

Overall Community Goals

- Preserve and enhance the valued natural resources of the Scripps Miramar Ranch community: hills, trees, water resources, Miramar Reservoir, Carroll Canyon, and subsidiary canyons; maximize public benefit through public ownership and/or access, both visual and physical, to these resources.
- Provide a harmonious physical environment within the community by maximizing preservation of existing stands of trees and foresting appropriate open space areas as development occurs.

Transportation Element Objectives

- Preserve and enhance the forested and hilly character of the community. Provide low-maintenance landscaping along roadways, wherever appropriate, which emphasizes the use of eucalyptus trees.

Transportation Element Design Objectives

Design of all roadways in the planning area should consider the following objectives:

- Maintain and enhance the rural, forested character of the community.
- Support the concepts of hillside preservation and design.
- Incorporate eucalyptus trees and compatible vegetation in landscaping along roadways where appropriate.
- Preserve mature trees wherever possible.

Design Element Objectives

- Protect environmental resources that are typically associated with hillsides, preserve significant public views of and from hillsides, and maintain a clear sense of natural hillside topography throughout the development of Scripps Miramar Ranch.
- Encourage a sensitive form of development on the community's hillsides by allowing for their reasonable use in a manner which complements their natural character and relates to the visual environmental character of the community and the Open Space Element of the General Plan.
- Encourage design diversity and variety of interpretation but avoid visual chaos and incongruity.
- Foster a sense of neighborhood identity by encouraging design diversity between development subunits while promoting design integration and compatibility within neighborhood concept areas.

Design Element Proposals

Preservation of Eucalyptus Trees

Important to the historical continuity and overall community design is the preservation of as many existing eucalyptus trees as possible. Hence, all forested areas should be defined on tentative maps and other development plans. Methods available to preserve these trees could include the following:

- Construction of roads at or near grade.
- Use of bridges as opposed to fills and culverts.
- Use of stepped footings on unpadded lots greater than 20,000 square feet.
- Justification of removal of each tree having a diameter exceeding eight inches.

Landform and Grading

- Development should relate to existing topographic and landscape features. The hill-valley relationship should be maintained and not obliterated. While hilltops and valleys may be graded to permit human settlement, the sense of distinctive landform should remain.
- House foundations, driveways, patios, and other similar structures that occur on steep hillsides should minimize the covered surface and should support or be compatible with natural drainage.
- Homes that must be built on steep hillsides should be adapted to the hillside condition instead of using large, prepared pads.
- Cut and fill slopes should emphasize the natural form of hillsides.
- Where development on a hilltop is parallel to or adjoins a canyon development, an adequate horizontal separation should be maintained. If conditions limit this distance, adequate landscaping should define the separation. This landscape separation should be maintained until grade differentials create a vertical separation.

Architectural Form and Character

1. *Site Relationships*

    - Each building should relate in terms of mass and bulk to its neighbor but should not be identical.
    - Stereotyped, repetitive patterns should be avoided.
    - The use of clustered housing should be encouraged to protect the existing hillside topography and significant resources.
    - Houses should be located to preserve trees and special environmental resources.
    - Masses of one structure should relate in a sympathetic manner to all neighboring structures. Architectural forms and treatments that are strongly identified as being the same when repeated should be avoided.

2. *Building Material and Colors*

    - The following materials are encouraged for building exteriors: natural materials with earth-tone colors; woods with transparent stains or heavy body stains; rough sawn or resawn woods finishes or painted smooth wood; and roof materials of wood shingles or tiles.

3. Building Elevations

- Every building should have shadow relief. Popouts, overhangs, and recesses may be used to produce effective shadow interest areas. Larger buildings require more shadow relief than do smaller buildings. Large, unbroken expanses of wall should usually be avoided.

Parks, Recreation, and Open Space Element Objectives

- Require developers to set aside at least 25% of the total project area for designation as park and/or open space.
- Maximize preservation of existing mature eucalyptus groves, natural slopes, and major canyons through careful siting of roadways and structures.
- Forest open space areas not adjoining Miramar Reservoir at a minimum of 100 eucalyptus trees per acre, thereby expanding the unique and valued eucalyptus environment of this community.
- Preserve and enhance the valued natural resources of the Scripps Miramar Ranch community: hills, trees, water resources, Miramar Reservoir, Carroll Canyon, and subsidiary canyons. Designate the park site located adjacent to the eastern end of the Miramar Reservoir for passive neighborhood park use, and preserve the site south of Pomerado Road in Carroll Canyon, on property adjacent to Alliant International University by including the land as part of the City's Multiple Habitat Planning Area.

Lastly, the Scripps Miramar Ranch Summary Table of Plan Proposals, reproduced partially below as Table 5.17-1, outlines proposals, action items, and responsibilities within the Parks, Recreation, and Open Space and the Community Environment Elements (Scripps Miramar Ranch Planning Committee et al. 2018).

Table 5.17-1
Scripps Miramar Ranch Community Plan Summary Table of Plan Proposals

Proposal	Action	Responsibility
Parks, Recreation, and Open Space Element		
Landscape open spaces with eucalyptus trees.	Plant at rate of 100 trees per acre.	Private developer
Community Environment Element		
Preserve existing eucalyptus trees and extend groves with landscaping of open spaces.	Review all proposals; encourage large-lot development in forested areas.	Developers Scripps Miramar Ranch Planning Committee City of San Diego Planning Department

San Diego Municipal Code

Lighting and Glare

Lighting within the City is regulated by the City's Outdoor Lighting Regulations contained in San Diego Municipal Code (SDMC) Section 142.0740. The City's Outdoor Lighting Regulations are intended to protect surrounding land uses from light pollution, including light trespass, glare, and urban sky glow, in order to preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination. General regulations limit illumination intensities and times of operation require shielding and directional controls, and mandate compliance with applicable regulatory standards (i.e., California Building Code, California Electric Code, Federal Aviation Administration).

Glare within the City is controlled by SDMC Section 142.0730, Glare Regulations, which include the following:

- A maximum of 50% of the exterior of a building may be comprised of reflective material that has a light-reflectivity factor greater than 30% (Section 142.0730 [a]).
- Reflective building materials shall not be permitted where the City Manager determines that their use would contribute to potential traffic hazards, diminished quality of riparian habitat, or reduced enjoyment of public open space (Section 142.0730 [b]).

Steep Hillsides

The project site contains Environmentally Sensitive Lands (ESL), including biologically sensitive resources and steep hillsides. Development regulations for steep hillsides that are categorized as ESL are regulated by SDMC Section 143.0142, Development Regulations for Steep Hillsides. The following components of SDMC Section 143.0142 are applicable to this project:

- Inside of the MHPA [Multi-Habitat Planning Area], the allowable development area is determined in accordance with the regulations set forth in the OR [Open Space–Residential]-1-2 zone, pursuant to Section 131.0250(b).
- Outside of the MHPA, the allowable development area includes all portions of the premises without steep hillsides. Steep hillsides shall be preserved in their natural state, except that development is permitted in steep hillsides if necessary to achieve a maximum development area of 25% of the premises.
- All development occurring in steep hillsides shall comply with the design standards identified in the Steep Hillside Guidelines in the Land Development Manual for the type of development proposed.

- Newly created slopes shall not exceed the slope gradient permitted in Section 142.0133.
- Disturbed portions of the site in 25% (4 horizontal feet to 1 vertical foot) or greater slopes shall be revegetated or restored in accordance with Chapter 14, Article 2, Division 4 (Landscape Regulations).
- Before approval of any Neighborhood Development Permit or Site Development Permit, the applicant shall execute and record in favor of the City a hold harmless and/or indemnification agreement for the approved development, as necessary and appropriate.
- Any increase in runoff resulting from the development of the site shall be directed away from any steep hillside areas and either into an existing or newly improved public storm drain system or onto a street developed with a gutter system or public right-of-way designated to carry surface drainage run-off.
- Erosion Control Measures
    - Outside of the Coastal Overlay Zone, erosion control measures are not subject to the 25% development area regulations in Section 143.0142(a) but are subject to the Landscape Regulations in Chapter 14, Article 2, Division 4, and the Steep Hillside Guidelines in the Land Development Manual.
    - Air-placed concrete, including gunite or shotcrete, retaining walls, buttress fills, and other similar erosion control measures may be allowed only if determined to be the only feasible means of erosion control to protect the existing primary structures or public improvements.
        - These measures shall be designed and implemented in accordance with generally accepted engineering standards and specifications and shall also incorporate existing adjacent landform characteristics including color coating, texturing, landscape, and topographical features.

5.17.3 IMPACTS ANALYSIS

5.17.3.1 Issue 1: Vistas and Scenic Views

Issue 1: Would the project result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?

Thresholds

According to the City's CEQA Significance Determination Thresholds (City of San Diego 2022), a project is considered to have a significant impact if the project would block public views from designated open space areas, roads, or parks or to significant visual landmarks or scenic vistas (e.g., Pacific Ocean, downtown skyline, mountains canyons, 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.
- 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.
- The project exceeds the allowed height or bulk regulations, and this excess results in a substantial view blockage from a public viewing area.

Note that views from private property are not protected by CEQA or the City.

Impact Analysis

Designated Public View Corridor

As discussed under Section 5.17.1, Existing Conditions, the project site is not identified as a protected scenic vista in the City's General Plan (City of San Diego 2008). No designated scenic overlooks, view cones, or framed view corridors exist within or near the project site. The Community Plan does not identify scenic corridors but identifies visual public resources that are addressed in the section below. Therefore, the project would not result in the obstruction of a designated public view corridor as shown in an adopted community plan or the General Plan.

Public Viewing Areas of a Public Resource

As described above, the project site primarily consists of undeveloped slopes and a small developed area containing a single-family home bordered by a small grove of mature eucalyptus trees. Further,

the site contains hills, water resources, trees, and canyons that are considered by the Community Plan to be valued visual resources to be preserved and enhanced. The water resources present on site (in particular, the mapped artificial wetland in the northern portion of the project site), have little to no public visibility (i.e., the feature is visible from the southern terminus of Mundial Street). Existing views of hills, trees, and canyons are generally limited to Cypress Canyon Park Road, Cypress Canyon Road, Spring Canyon Road, Cypress Valley Drive, Mundial Street (public roads), and Cypress Canyon Park. The site's hilly terrain and clustered trees may also be visible from select trails within Sabre Springs Open Space. The analysis below describes anticipated impacts to views of the project site (and more specifically, views of the site's visual public resources) available from select public roads, Cypress Canyon Park, and Sabre Springs Open Space.

Public Roads in the Surrounding Area

Cypress Canyon Park Drive

As previously stated in Section 5.17.1, above, the available view from Cypress Canyon Park Drive towards the project site is not panoramic in nature and is short in length/depth (i.e., does not extend beyond the project site that is located within 500 feet of the roadway). Therefore, the view from Cypress Canyon Park Drive towards the project site is not a scenic vista.

Along eastbound Cypress Canyon Park Drive, portions of the project site's north-facing vegetated slope, the existing on-site residential structure, and several ridgeline eucalyptus located near the residential structure are within the peripheral view of road users. Under existing conditions, these elements of the project site are generally visible from eastbound Cypress Canyon Park Drive between just west of a small knoll/ridge located west of Cypress Terrace Plan and Candy Rose Way (a distance of approximately 320 feet that, at a speed of approximately 25 miles per hour, is covered in approximately 11 seconds). Following construction of the project, visible eucalyptus atop the central ridge of the site would be removed (the existing residence would also be removed) and existing vegetation on the north-facing slope would be removed. Further, soil would be imported to the north portion of the project site to construct more moderate north-facing slopes capable of supporting an enlarged ridge area upon which multiple residential structures and interior roads would be constructed. From Cypress Canyon Park Drive, the existing central ridge on the project site would be extended out to the north, a row of single-family residences would line the edge of the new ridge area, and manufactured slopes would extend down from the residentially developed area to the canyon bottom (the bottom portion of new slopes would be blocked from view of intervening terrain).

From Cypress Canyon Park Drive, several mature eucalyptus trees in the central ridge area of the project site, as well as the densely vegetated hillsides in the north portion of the project site, would

be removed and replaced with broadened ridge terrain and manufactured, north-facing slopes landscaped with a mix of coastal sage scrub and southern mixed chaparral community plant species. Twenty-four-inch box slope trees including toyon, coast live oak, and coastal shrub oak would be planted at the edge of the new ridge area (just north of new residential homes) and around the perimeter of new biofiltration basins that would be constructed near the on-site existing metal siding structure visible in Figure 5.17-5 (see Photo A). In addition, a row of two-story, single-family homes would line the new expanded ridge (the north-facing, rear elevation of two-story homes would be partially blocked from view of Cypress Canyon Park Drive users by new 24-inch box slope trees that would be planted between residential lots and the proposed 6-foot-high fire wall at the top of nearby manufactured slopes).

While users of Cypress Canyon Park Drive would experience the visual changes described above and existing visual resources including vegetated slopes and mature eucalyptus trees would be removed from the site (i.e., existing views would be altered), project development would not cause substantial view blockage of a public resource. No view blockage would occur along Cypress Canyon Park Drive (the nearest proposed home on the project site would be set back approximately 680 feet from Cypress Canyon Park Drive).

Cypress Canyon Road

As previously stated in Section 5.17.1, above, the views from Cypress Canyon Road towards the project site are not scenic vistas.

Under existing conditions, views of the project site from the majority of westbound Cypress Canyon Road are mostly blocked or partially screened by mature trees located in the narrow parkway that parallels Cypress Canyon Road and by the grove of mature eucalyptus and other trees located in the southwestern corner of the Cypress Canyon Park property (see Photo C in Figure 5.17-6). At the existing bulbed western terminus of the road ending in a locked gate and driveway onto the project site, existing views of the chain-link gate, fencing, paved access drive, and mostly undeveloped hillside would be altered by project development. Specifically, the existing gate and fencing would be removed and an improved gate and driveway would be constructed to facilitate site access. The project includes minimal grading to the east/upslope area of the proposed driveway (Cypress Canyon Road [South] as depicted on Figure 3-1, Site Plan) but a significant amount of contoured grading to the south of the proposed driveway would occur and would be mostly obscured from view by intervening terrain at the western terminus of Cypress Canyon Road. From the existing western terminus of Cypress Canyon Road, the removal of several eucalyptus trees near the existing gate and on the project site's south-facing slope (see Photo D in Figure 5.17-6) would be visible. Further, several new two-story residences constructed to the south of the proposed site driveway (see Figure 3-1) would be visible, as the structures would climb the proposed manufactured terrain

towards the central area of the site. Lastly, the existing terrain to the north of the existing and proposed on-site driveway would mostly remain intact and, as such, the proposed residential structures and eucalyptus tree removal proposed in the central ridge area of the site would not be visible from the western terminus of Cypress Canyon Road.

The narrow available views of existing terrain would mostly remain intact due to the minimal grading along the eastern portion of the proposed driveway. Additionally, the volume of viewers at the western terminus of Cypress Canyon Road is limited because Cypress Canyon Road terminates at the locked gate and fenced, private driveway of the site. The bulbed, western terminus is used for parking for the adjacent park and motorists may use the area temporarily to turn their vehicles around and continue east on Cypress Canyon Road. While several eucalyptus trees in the southeastern corner of the project site that are currently visible would be removed during site preparation and grading, visible manufactured slopes to the south of the new driveway, the new driveway and proposed driveway trees, and several two-story residential structures along proposed Cypress Canyon Road (South) would be visible, new site components would not block a public scenic resource from view. Visible slopes, site landscaping, and structures would not block any existing trees from view at the western terminus of Cypress Canyon Road.

Spring Canyon Road

As previously stated in Section 5.17.1, above, the longer-distance views available from Spring Canyon Road through gaps in trees are scenic, and the resources visible from the road include mature eucalyptus trees installed along the road, lands to the immediate north of the road and on the ridgeline portion of the project site, and hill and mountain terrain.

From westbound Spring Canyon Road between Pomerado Road and Riesling Drive (a distance of approximately 1,700 feet), the project site is mostly blocked or partially screened from view by shrubs and mature trees, including the dense grove of mature eucalyptus located to the immediate north of this segment of Spring Canyon Road. Narrow viewing windows through short gaps in vegetation are infrequently available along the road; however, any available views extending to the site are experienced briefly (less than a few seconds) by users of westbound Spring Canyon Road. See Photos E through G in Figure 5.17-7 for an example of available views towards the project site from westbound Spring Canyon Road between Pomerado Road and Riesling Drive. The photographs in Figure 5.17-7 are from the Spring Canyon Road sidewalk, as photographs from Spring Canyon Road could not be taken due to safety concerns.

With the completion of the project, the removal of existing eucalyptus trees and the residential structure and the addition of new two-story residences and slope trees planted near the top of manufactured slopes in the southern portion of the project site may be detectable from select

vantage points along westbound Spring Canyon Road. See Photo G in Figure 5.17-7, which shows a partially blocked view to the central ridge portion of the project site. Proposed grading along the southern boundary of the development area would be mostly blocked from view by intervening mature trees and shrubs. Despite the anticipated changes in views of the project site available from westbound Spring Canyon Road, the duration of available views to project components for motorist and pedestrians traveling along this roadway would be brief (lasting for approximately 16 seconds for motorists traveling at approximately 50 miles per hour) and views of the project from the majority of the Spring Canyon Road between Pomerado Road and Riesling Drive would be either partially or fully screened by intervening shrubs and trees. At this distance, the project site would not be a prominent portion of the view, and the majority of the view would be continued to be defined by mature trees and existing residential development to the north and south of Spring Canyon Road. In addition, development of the project would not cause substantial view blockage from a public viewing area of a public resource. At its closest point, the southern boundary of the project site is set back nearly 600 feet from Spring Canyon Road, and as such, proposed residential structures and landscaping would not result in view blockage from Spring Canyon Road.

Cypress Valley Drive

As previously stated in Section 5.17.1, above, the available view from Cypress Valley Drive towards the project site is not panoramic in nature, is short in length/depth (i.e., does not extend beyond the mounded hill terrain underlying the eastern and central portion of the project site or lands to the immediate south that support a dense grove of mature eucalyptus trees), and is not a scenic vista.

Existing views of the project site from eastbound Cypress Valley Drive (west of Arborside Way) and from the eastern terminus of Cypress Valley Drive consist of the broad, southwest facing hillside located on the western boundary of the project site. At these locations along Cypress Valley Drive, road users are provided views of the site's undeveloped and vegetated west- and south-facing slopes, the mostly blocked façade and roof of the existing on-site residence, and a cluster of mature eucalyptus trees on the visible slope and near the existing on-site residence.

With the implementation of the project, existing views of the trees, residential structures, and mostly undeveloped hillside would be visibly altered. The existing scrub vegetation on the slopes would be removed and existing gradually rising slopes would be steepened, straightened (i.e., would visually appear manufactured and not natural), and extended southward towards the project site's southern boundary. In accordance with the landscape plan, coastal sage scrub species would be planted on the manufactured slopes that would be visible from Cypress Valley Drive (see Figures 3-3a through 3-3c, Landscape Plan). The centrally located ridge on the project site would be widened/expanded to the south to accommodate proposed residential structures, and as a result, development would extend out into where existing slopes are currently located. From this particular roadway, the

project would result in the removal of the existing residential structure and eucalyptus trees and their replacement with new two-story residences, landscaped manufactured slopes, and slope trees near the top of visible manufactured slopes.

While visual change would be noticeable from Cypress Valley Drive and proposed development would physically alter the existing terrain and remove numerous eucalyptus trees, proposed manufactured slopes, slope trees, and two-story residential structures would not result in substantial view blockage. The existing views from eastbound Cypress Valley Drive and the eastern bulbed terminus of Cypress Valley Drive (see Photos H through J on Figure 5.17-8) do not extend beyond the project site and proposed development would not block or alter existing available views from Cypress Valley Drive to the large grove of mature eucalyptus trees located to the immediate south of the project. Therefore, proposed development would not cause substantial view blockage of a public resource.

Mundial Street

As previously stated in Section 5.17.1, above, the available south-oriented view from Mundial Street towards the project site is not panoramic in nature, is short in length/depth (i.e., does not extend beyond the elevated slope and ridgeline terrain present in the foreground), and is not a scenic vista.

Mundial Street is a short, approximately 400-foot-long street connecting to Cypress Canyon Park Drive and ending at a fenced terminus that abuts the northern boundary of the project site. Portions of the project site's north-facing slope are visible from the entire length of the street; however, views of the site become narrower near the end of Mundial Street due to the proximity of the slope (e.g., the existing on-site residential structure and nearby eucalyptus trees are less visible from the southern extent of Mundial Street compared to from Mundial Street near Cypress Canyon Park Drive). From Mundial Street near Cypress Canyon Park Drive, the site's vegetated north-facing slope, the central ridge area, the reddish roof and light-colored exterior wall of the on-site existing residence, and several eucalyptus trees are visible (see Figure 5.17-9). Upon implementation of the project, existing on-site structures and the ridgeline eucalyptus trees would be removed, as would existing vegetation on the site's north-facing slope. To accommodate the proposed building pad for residential development, new manufactured slopes would be constructed to the south of Mundial Street and the existing on-site central ridge area would be expanded northward. This alteration of existing vegetation and terrain would be clearly visible from Mundial Street and would noticeably alter the existing character of the northern portion of the project site. Further, as viewed from Mundial Street, a row of new two-story residences constructed atop the broadened terrain would be viewed against the background sky and stretch across the view from east to west. The rear elevation of new homes would be partially blocked from view by new slope trees that would be planted near

the top of proposed manufactured slopes. Lastly, new manufactured slopes to the south of Mundial Street would be planted with plants from the coastal sage scrub vegetation community (over time, slope vegetation would become denser and begin to resemble existing vegetation on the site's north-facing slope).

Despite the anticipated visual change described above that would be detectable from Mundial Street, the project would not result in view blockage of a public visual resource. New ridge residential homes and proposed grading would not block or otherwise obstruct an existing view corridor from Mundial Street to a public visual resource. As previously stated, the southerly view towards the project site from Mundial Street does not extend beyond the project site, and long and particularly broad views are not available from southbound Mundial Street. Therefore, proposed development would not cause substantial view blockage of a public resource.

Cypress Canyon Park

As previously stated in Section 5.17.1, above, the available views from Cypress Canyon Park towards the project site are not panoramic in nature, are short in length/depth (i.e., do not extend beyond the elevated slope and ridgeline terrain present in the foreground), and accordingly, are not scenic vistas.

With the implementation of the project, existing views from the park to the project site would largely remain unchanged. As detailed in Section 5.17.1, with the exception of the crowns of two eucalyptus trees in the central ridge portion of the project site that are partially visible from a short segment of the perimeter trail in the northwestern corner of the park, project site features including vegetated hillsides and the existing on-site residential structure are not visible from Cypress Canyon Park. Once constructed, manufactured slopes, landscaping, and new two-story structures on the project site would be blocked from view by the broad, pyramidal ridge located in the southeastern corner of the project site. Some grading and the exteriors of select two-story, single-family homes in the eastern portion of the project site may be visible from the narrow, northwestern corner of Cypress Canyon Park; however, these project features would be mostly blocked from view by intervening hillsides, mature shrub vegetation on the park property and within open space within the project site boundary, and tall eucalyptus trees on the park property. See Photo M in Figure 5.17-10, which details existing vegetation in the northwestern corner of the park property. As viewed from the narrow, northeastern corner of Cypress Canyon Park, detectable project components and effects would be partially screened from view, and visible exteriors of new residential structures would not result in substantial blockage of a public resource. Existing mature eucalyptus trees visible from the northeastern corner of the park would remain and, as experienced from Cypress Canyon Park, significant view blockage would not result from project development.

Sabre Springs Open Space

As previously stated in Section 5.17.1, above, available views from elevated terrain in the Sabre Springs Open Space area are expansive and considered scenic vistas. While the project site is within the viewshed of public trails within Sabre Springs Open Space (a natural open space area with public trails approximately 1.6 miles north of the project site), available views from trails are panoramic and broad, stretching beyond the project site and towards mountainous terrain on more distant Marine Corps Air Station Miramar and in Mission Trails Regional Park. The project site is included in views from the open space area; however, due to the panoramic nature of available views, the distance between trails and the project site, and the volume of ridgeline and mesa residential development in the vicinity, the project site and proposed development on the project site are not anticipated to be distinct in available views from the open space area. Further, due to the distance between trails and the project site (and due to the higher elevation of trails compared to the project site's ridge area), the construction of new two-story homes and installation of trees and shrubs on a lower elevation partially developed site located over 1.5 miles away would not block an existing view corridor to a public visual resource.

Black Mountain Open Space Park

As previously stated in Section 5.17.1, above, available views from elevated terrain in Black Mountain Open Space Park are expansive and are considered scenic vistas.

While the project site is within the viewshed of public trails in Black Mountain Open Space Park, available views from trails are panoramic and broad, stretching beyond the project site and towards mountainous terrain in Mission Trails Regional Park and beyond. The project site is included in views from the open space area; however, due to the panoramic nature of available views, the distance between trails and the project site, and the volume of ridgeline and mesa residential development in the vicinity, the project site and proposed development on the project site are not anticipated to be distinct in available views from the open space area. Further, due to the distance between trails and the project site, as well as the higher elevation of trails compared to the project site's ridge area, the construction of new two-story homes and installation of trees and shrubs on a lower-elevation partially developed site located over 4 miles away would not block an existing view corridor to a public visual resource.

Summary

While development of the project would result in changes to views of the project site available from nearby public roads, Cypress Canyon Park, and Sabre Springs Open Space, project changes, including the removal of existing vegetation and eucalyptus trees, proposed cut and fill (and more generally, grading) activities, installation of new landscaping, and construction of new ridgeline two-

story homes, would not cause substantial view blockage from a public viewing area of a public resource considered significant by the local community plan.

Height or Bulk Regulations

Rezone

The project would require a rezone of the project site from Agricultural–Residential (AR)-1-1 zone to Residential–Small Lot (RX) 1-2 where the single-family homes are proposed, Residential–Multiple Unit (RM) 2-4 where the multifamily units are proposed, and OR-1-2 where open space is proposed. The rezone would allow for an increase in the intensity of use and for the proposed residential development on site. The rezoning of the site from AR-1-1 to RX-1-2 would result in a decrease in minimum lot area, decreased setback requirements on all sides, and a maximum floor area ratio of 0.80. The project is also requesting deviations from SDMC to increase the height limit for development within the RX-1-2 zone from 30 to 35 feet for the proposed buildings and from 30 to 36 feet for the proposed retaining wall. The rezoning of the site from AR-1-1 to RM-2-4 would result in a decrease in minimum lot area, decreased setback requirements on all sides, a maximum floor area ratio of 1.20, and an increase in maximum height.

As proposed, the increased intensity of use and increased height allowance (30 feet to 35 feet) associated with the proposed AR-1-1 to RX-1-2 rezone would be most visible from public roads to the north and west of the project site including Cypress Canyon Park Drive, Mundial Street, and Cypress Valley Drive. Whereas the AR-1-1 zone requires minimum 10 acre lots and the site currently supports one existing residence, manufactured slopes would be constructed to accommodate 100 single-family homes and 12 multifamily rental units. The increased density of residential development on the project site permitted by the proposed rezone would result in closely spaced residential lot and homes lining the top of newly created terrain and would bring residential development on the project site closer to existing residences in the surrounding area. Despite the increased intensity of development permissible on the project site resulting from the proposed rezone, the proposed greater volume of residential structures (and associated grading necessary to support the footprint of residential structures) would not result in a substantial view blockage from a public viewing area. The development footprint is generally set back from existing public viewing locations in the surrounding area, and where the development footprint is located in close proximity to a public road (such as at the eastern terminus of Cypress Valley Drive), existing views from public roads do not extend beyond the project site. Therefore, the proposed intensity of development attributed to the proposed zone changes would not result in substantial view blockage from a public viewing area.

Proposed deviations to allow for a 6-foot to 10-foot increase in single-family residential structure height (i.e., increase in permissible height in the R-X-1-2 and RM-2-4 zones compared to permissible height in the baseline AR-1-1 zone) are not anticipated to be overly noticeable from public viewing locations in the surrounding area largely due to distance between the development footprint and public viewing locations and anticipated blockage of the proposed multifamily rental units from public viewing locations. Based on location within the site plan, the proposed multifamily rental units would be mostly blocked from view along public roads by intervening terrain and by proposed two-story residential homes located around the perimeter of most of the development footprint. Because the increased building height allowances proposed by the project would not be overly noticeable from public viewing locations compared to that associated with the baseline AR-1-1, and because the proposed multifamily rental units would be mostly blocked from view at public locations in the surrounding area, proposed increases in development height would not result in substantial view blockage from a public viewing area.

As proposed, the 36-foot-high soil nail wall (retaining wall) would be located between the existing elevated ridge and the primary access driveway to the project site from existing Cypress Canyon Road in the eastern portion of the development footprint. Due to its location and, more specifically, the presence of tall and sloping intervening terrain to the immediate east, the proposed wall would have very limited visibility from public viewing locations. For example, the proposed soil nail wall would not be visible from Cypress Canyon Park, Mundial Street, Cypress Canyon Road, and Cypress Canyon Park Drive due to screening by intervening terrain and/or proposed site development. In addition, fleeting views of a brief (i.e., lasting a few seconds) nature of the proposed soil nail wall from eastbound Spring Canyon Road may be available but would mostly be screened from view by existing mature eucalyptus trees and shrubs located to the immediate north of Spring Canyon Road. Also, where potentially visible in narrow gaps between eucalyptus trees, the proposed soil nail wall would be located east of proposed two-story residences and would be blocked from view of Spring Canyon Road users.

In conclusion, approval of the deviations, rezone and related increased intensity of use on the project site would not result in substantial view blockage from a public viewing area.

Significance of Impact

Designated Public View Corridor

The project would not result in the obstruction of a designated public view corridor as shown in an adopted community plan or the General Plan; therefore, impacts would be less than significant.

Public Viewing Areas of a Public Resource

While the project would result in changes to views of the project site, the project would not result in the blockages of views of public resources; therefore, impacts would be less than significant.

Height or Bulk

The project would result in less-than-significant impacts associated with substantial view blockage from a public viewing area, and the increased height of the proposed buildings and retaining wall (soil nail wall) would not result in substantial view blockage of a public resource. Therefore, impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.17.3.2 Issue 2: Negative Aesthetic Site or Project

Issue 2: Would the project result in the creation of a negative aesthetic site or project?

Thresholds

According to the City's Significance Determination Thresholds (City of San Diego 2022), a project may have a negative visual appearance if one or more of the following conditions occur:

- The project would create a disorganized appearance and would substantially conflict with City codes (i.e., a sign plan that 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).
- The project includes crib, retaining, or noise walls greater than 6 feet in height and 50 feet in length with minimal landscape screening or berming where the walls would be visible to the public.
- The project is large and would result in an exceeding monotonous visual environment (e.g., a large subdivision in which all of the units are virtually identical).

Impact Analysis

Potential for Disorganized Appearance, Conflict with City Codes, and Potential for Monotonous Visual Environment

As described above, the project would be consistent with the development regulations established for the RX-1-2 and RM-2-4 zones, with the exception of a deviation in height. The project site is largely surrounded by single-family uses. As proposed, the project includes the construction of 100 single-family homes and 12 multifamily affordable income rental units. The project would provide a mix of architectural designs and accents that would add visual interest and avoid a monotonous visual appearance. Select designs and materials would integrate with the surrounding environment. The proposed architectural styles are shown in Figures 3-2a through 3-2f, Architectural Styles. Similar to existing single-family residences in the surrounding area, proposed single-family homes would be two stories and a maximum of 35 feet. Further, similar to existing nearby homes, residences would include exterior colors of light to medium dark earth tones.

While multifamily residential structures do not occur in the immediate surrounding area, the 12 multifamily units on the project site would compose a small percentage of the overall proposed on-site units (i.e., less than 10%) and would be partially blocked from view at off-site locations by existing terrain and manufactured slopes to the immediate east (and by new single-family homes in the northern portion of the proposed development). Thus, the project would generally be visually consistent with the surrounding area and proposed multifamily units would be limited in number and blocked from public view at off-site locations.

Furthermore, the project would include open space areas that would surround the majority of the proposed development. The incorporation of open space and site landscaping and revegetation plans would soften the overall introduction of the project to the landscape and help create a more gradual transition from the project to established neighborhoods to the west, north, and east, as well as the dense, off-site eucalyptus grove to the south. The implementation of site landscape and revegetation plans would also partially screen new structures and reduce the anticipated contrast resulting from the construction of manufactured slopes as viewed from nearby public vantage points. Through compliance with the SDMC, inclusion of varied architectural styles and materials, limitation of multifamily units, and incorporation of landscape and revegetation plans, the project would not result in the creation of a negative aesthetic site or project or an exceedingly monotonous visual environment.

Bulk and Scale Regulations

As discussed above, the project would require a rezone of the project site, which would allow for increased building density on the site, smaller lot sizes, increased floor area ratio, higher building

height, and smaller setbacks compared to existing zoning of the project site. These regulations would allow for a more compact and tightly spaced development with slightly taller two-story homes that would slightly differ from the layout/density of existing single-family residential developments in the immediate area. Development within the project site would be implemented through Citywide zoning with a development standards deviation to allow for a 35-foot building height for development within the RX-1-2 zone (compared to a currently allowable height of 30 feet) (see Section 3.3.8, Discretionary Actions). As described above, the project would provide a variety of architectural styles (see Figures 3-2a through 3-2f) to create visual interest and avoid a monotonous visual appearance. Therefore, through compliance with SDMC and inclusion of varied architectural styles and materials, the project would not result in significant conflicts with the height, bulk, or coverage regulations of the zone. Further, the project would provide architectural interest.

Walls

In order to reduce the grading footprint, retaining walls would be constructed on the project site. Specifically, the project is requesting a deviation from the SDMC to increase the height limit for development within the RX-1-2 zone from 30 to 36 feet for the proposed retaining wall. Wall heights and setbacks would be consistent with the SDMC requirements, with the exception of the deviation request for a 36-foot soil nail wall along the eastern boundary of the project site; more specifically, the wall would be along the proposed extension of westbound Cypress Canyon Road onto the project site and around the eastern boundary of the multifamily rental pad. As shown in Figure 5.17-11, Cross Sections, the proposed soil nail wall would be shielded from view of Cypress Canyon Park users and residents of neighborhoods to the north of the project site by existing off-site trees and by the existing terrain to the west of the park. The proposed wall would also not be visible from Mundial Street, Cypress Canyon Road, and Cypress Canyon Park Drive due to screening by intervening terrain and/or proposed site development.

In addition to the proposed retaining wall described above, the project would include 6-foot fire walls installed near the top of the proposed manufactured slopes adjacent to the rear lot boundary for lots unable to achieve a full 100 feet of brush management. While select walls would exceed 50 feet in length and 6 feet in height, landscaping and intervening topography would help screen the walls from viewers at public viewing locations. In accordance with the project landscape plan, slope trees (e.g., toyon, coast live oak, and coastal shrub oak) and ground cover would be installed on the short slopes abutting the proposed fire walls and coastal sage scrub container plants would be installed on the manufactured slopes below the proposed fire walls. Proposed landscaping would help break up the massing and regular form and line of the walls. In addition, the inclusion of landscaping would add visual interest and attract attention away from walls. As such, the walls would not result in a negative aesthetic.

Significance of Impact

Potential for Disorganized Appearance, Conflict with City Codes, and Potential for Monotonous Visual Environment

Development of the project site would occur in an organized manner that would be guided by a site plan and the SDMC. The project would provide a mix of architectural designs and accents that would add visual interest and avoid a monotonous visual appearance. Additionally, the project would include open space areas that would surround the majority of the proposed development, which would create variation in the project site and help soften the introduction of the project to the existing landscape (and surrounding community). Therefore, impacts concerning a negative site aesthetic resulting from a disorganized appearance, conflict with codes, or a monotonous visual environment would be less than significant.

Bulk and Scale Regulations

Through compliance with the SDMC, project changes would not be characterized as a negative aesthetic impact. Therefore, impacts concerning negative site aesthetics resulting from inconsistency with bulk and scale regulations would be less than significant.

Walls

While the proposed fire walls would exceed 50 feet in length and 6 feet in height and a deviation would be requested from the SDMC to increase the height limit for development within the RX-1-2 zone from 30 to 36 feet for the soil nail retaining wall, proposed landscaping and existing intervening topography would help screen the walls from viewers. In addition, proposed landscaping would help break up the massing and regular form and line of the walls (landscaping would also add visual interest and attract attention away from walls). Therefore, impacts related to a negative site aesthetic resulting from walls would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.17.3.3 Issues 3 and 4: Compatibility with Surrounding Development and Existing or Planned Character of the Area

Issue 3: Would the project result in bulk, scale, materials, or style which would be incompatible with surrounding development?

Issue 4: Would the project result in substantial alteration to the existing or planned character of the area, such as could occur with the construction of a subdivision in a previously undeveloped area?

Thresholds

According to the City's Significance Determination Thresholds (City of San Diego 2022), a project is considered to have a significant impact if a project would 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.
- 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.
- The project is 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.

Impact Analysis

Bulk, Height, and Scale

As discussed above, the project would require a rezone that would increase the density of development at the project site. The rezoning of the site would result in a decrease in minimum lot area, decreased setback requirements on all sides, and an increase in maximum height. Development within the project site would be implemented through Citywide zoning with a deviation from development standards to allow for a 35-foot building height for development within the RX-1-2 zone (compared to an allowable height of 30 feet). With the proposed deviation to

increase the height within the RX-1-2 zone from 30 feet to 35 feet, the development of the project would be consistent with the height and bulk regulations of the proposed zoning. Building scale, bulk, and massing would be controlled by setbacks, floor area ratio restrictions, and building height limitations set by the SDMC. In addition, the project is largely surrounded by existing two-story single-family residential development (approximately 25- to 30-foot-high homes), similar to the proposed project. While the project would exceed the allowable height of the proposed zone, the project would not result in a substantial exceedance considering it would be consistent with the existing patterns of development in the vicinity. The building parameters, together with the architectural design principles, would ensure a cohesive and compatible form and a consistent scale for development.

Architectural Styles

The project would have a different design than the adjacent single-family neighborhoods, as these adjacent areas tend to support older, ranch-style development. The project's buildings would be incorporate a range of potential architecture styles, such as California Coastal, Craftsman, Farmhouse, Monterey, Spanish Revival, and/or Tuscan style (see Figures 3-2a through 3-2f). Further, building exteriors would be finished with a variety of colors and textured materials to articulate buildings' facades and architectural features. The range of architectural styles, earth-tone colors, and accent materials would be compatible with the surrounding development. Project buildings would incorporate a mix of architectural styles, as well as stucco clad, earth-tone exteriors, consistent with the colors and materials used in nearby residential development. Therefore, overall, the project would not be in stark contrast to adjacent development where the adjacent development follows a single or common architectural theme.

Community Identification Symbol or Landmark

While no specific community landmarks identified in the General Plan or Community Plan are present at the project site (City of San Diego 2008; Scripps Miramar Ranch Planning Committee et al. 2018), development of the project site would result in the removal of numerous eucalyptus trees that are identified in the Community Plan as important public resources. Community identification symbols or landmarks are primarily valued based on the visual representation of the community, as well as their location in an area visible to a relatively high number of viewers, such as main community thoroughfares. In the context of the Community Plan and more specifically, the project area, eucalyptus trees have been deliberately established for public enjoyment along the Spring Canyon Road corridor, as evidenced by the numerous clusters and groves of mature eucalyptus planted adjacent to the sidewalk and on nearby lands, as well as established policies in the Community Plan. See Photo E on Figure 5.17-7. These existing clusters and groves have public value that contribute to the existing character of the Spring Canyon Road corridor and broader

Community Plan area. Conversely, the eucalyptus trees occurring on the project site are primarily visible to and experienced by nearby private viewers (residents) and motorists along Cypress Canyon Park Drive and other local neighborhood roads that experience relatively lower volumes of daily traffic compared to the larger thoroughfares.

Despite the loss of eucalyptus trees associated with the proposed development, the existing collection of eucalyptus trees on the project site does not provide public views along a main community thoroughfare (like that of the trees along Spring Canyon Road), but rather background views for private neighboring residences. Further, development of the project site would include the planting of slope trees, accent trees, or other trees (planting of eucalyptus trees is not proposed) that would contribute vegetative forms, scales, and character to the project site. Ultimately, the project site would generally resemble existing residential developments in the immediate surrounding area and would not result in a substantial change to a community symbol or landmark.

Height, Bulk, Signage, or Architectural Projection with High Project Visibility and Contrast

The project is located on an existing hilltop surrounded by steep slopes and pockets of vegetation between the site and the surrounding single-family residential development. Despite its elevated location atop a ridge and due to the density of eucalyptus and other trees in the surrounding area (particularly along roads but also on undeveloped slopes), views of the project site are generally limited to surrounding roadways and public trails on the elevated south- and east-facing slopes of Sabre Springs Open Space (see Section 5.17.3.1). The project would not be visible to motorists traveling on any interstate or state route due to intervening terrain, landscaping, and development.

As previously discussed in Section 5.17.3.2, the project site is largely surrounded by two-story single-family residences and would generally be visually consistent with existing structures in the surrounding area. Proposed height of two-story structures would generally be similar to the height of existing two-story residences located in nearby neighborhoods. Proposed multifamily units (up to 40 feet in height) would be taller than existing nearby single-family residents; however, the 12 proposed units would be partially blocked from view at off-site locations by existing terrain and manufactured slopes to the immediate east (and by new single-family homes in the northern portion of the proposed development). Proposed architectural styles of the project are depicted on Figures 3-2a through 3-2f, and while existing homes in the surrounding area present a relatively consistent architectural theme, the project's proposed architectural styles do not include particularly unique architectural projections that would strongly contrast with surrounding development. Further, the range of proposed architectural styles proposed by the project would not be visible/experienced from any one particular vantage point. In addition and as discussion under Section 5.17.3.2 above, development of the project site would not result in a negative site aesthetic and would instead occur in an orderly manner and pursuant to a proposed site plan. Therefore, the

project would not strongly contrast with the surrounding development or natural topography through excessive height, bulk, signage, or architectural projections.

Alteration to Existing or Planned Character

The project site is currently identified as having approximately 25.57 acres of Open Space and 15.03 acres of Residential in the Community Plan area (Scripps Miramar Ranch Planning Committee et al. 2018) and is designated Park, Open Space, and Recreation and Residential in the General Plan (City of San Diego 2008). Further, the project site is zoned as AR-1-1 (City of San Diego 2021). The project would require a Community Plan Amendment to change the existing density of the site from 1.1 dwelling units per acre (du/ac) to 2.8 du/ac. The Community Plan Amendment proposes 29 acres of residential development and 11.56 acres of open space. A rezone is also proposed to change the existing AR-1-1 zone to RX-1-2, RM-2-4, and OR-1-2. A total of 33.40 acres of the site is also designated as MHPA.

The proposed rezone and Community Plan Amendment would allow for increased density (from 4 units to 112 units) on the project site. Therefore, although the project site currently contains an existing single-family residence with associated structures and was planned for residential units in existing City plans, development of the project would create residential scales and densities not previously envisioned for the project site. As discussed above, the visibility of the project would be interrupted by intervening trees, development, and terrain; through adherence with the SDMC and with the processing of project entitlements and the proposed rezone and Community Plan Amendment, the project would not result in bulk, scale, materials, or style which would be incompatible with surrounding development. Further, the project site is surrounded by residential development on all sides. Therefore, the project would be consistent with its surroundings and would not result in substantial alteration to the existing or planned character of the area.

Significance of Impact

Bulk, Height, and Scale Architectural Styles

The project would incorporate a mix of architectural styles, as well as stucco clad, earth-tone exteriors, consistent with the colors and materials used in nearby residential development. Therefore, overall, the project would not be in stark contrast to adjacent development where the adjacent development follows a single or common architectural theme. Thus, the project would not result in significant impacts related to height, bulk, signage, scale, or architectural styles that would be incompatible with surrounding development, and impacts would be less than significant.

Community Identification Symbol or Landmark

The development of the project site would result in the removal of numerous eucalyptus trees. The existing collection of eucalyptus trees on the project site is not particularly large or visually prominent relative to other stands in the community. In addition, the existing eucalyptus trees on the project site have very limited visibility from a main community thoroughfare (e.g., Spring Canyon Road). Overall, the on-site trees do not represent a significant community symbol or landmark. Further, development of the project site would include the planting of slope trees, accent trees, or other trees (planting of eucalyptus trees is not proposed) that would contribute vegetative forms, scales, and character to the project site. Ultimately, the project site would generally resemble existing residential developments in the immediate surrounding area and would not result in the substantial alteration of a significant community identification symbol or landmark. As such, impacts would be less than significant.

Height, Bulk, Signage, or Architectural Projection with High Project Visibility and Contrast

While located atop a ridge and visible from surrounding public roads, the project would not strongly contrast with the surrounding development or natural topography through excessive height, bulk, signage, or architectural projections. The proposed height of two-story structures would generally be similar to the height of existing two-story residences located in nearby neighborhoods and the height of multifamily units would be largely blocked from public view. The project's proposed architectural styles do not include particularly unique architectural projections that would strongly contrast with surrounding development. Thus, Impacts would be less than significant.

Incompatibility with Surrounding Development

Because visibility of the project would be interrupted by intervening landscaping, development, and terrain and required deviations in building height would not result in particularly strong contrast or a negative site aesthetic, the project would not result in bulk, scale, materials, or style that would be incompatible with surrounding development. Thus, the project would not result in significant impacts related to bulk, scale, materials, or style that would be incompatible with surrounding development, and impacts would be less than significant.

Alteration to Existing or Planned Character

Through compliance with the SDMC and with the processing of project entitlements and proposed rezone and Community Plan Amendment, the project would not result in bulk, scale, materials, or style that would be incompatible with surrounding development. Therefore, impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.17.3.4 Issue 5: Loss of Any Distinctive or Landmark Tree(s), or Stand of Mature Trees

Issue 5: Would the project result in the loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan? (Normally, the removal of non-native trees within a wetland as part of a restoration project would not be considered significant).

Thresholds

According to the City's Significance Determination Thresholds (City of San Diego 2022), a project is considered to have a significant impact if the project would:

- Result in the physical loss, isolation, or degradation of a community identification symbol or landmark (e.g., a stand of trees, coastal bluff, historic landmark) that is identified in the General Plan, applicable community plan, or local coastal program.

Impact Analysis

The Community Plan does recognize the preservation of eucalyptus trees as important to the continuity of overall community design (Scripps Miramar Ranch Planning Committee et al. 2018). As described in Appendix D of this EIR, the eucalyptus woodland vegetation community occurs mainly in the southwest portion of the project parcel, south of the wetlands in that area; however, individual eucalyptus trees are scattered across the site and are located near the existing on-site residential structure. Construction of the project would result in the removal of some of the on-site eucalyptus trees (particularly those located near the existing residence atop the centrally located ridge).

While existing eucalyptus trees on the project site are not identified as a distinctive stand of trees within the Community Plan, the Community Plan's Summary Table of Plan Proposals requires the preservation of existing eucalyptus trees (Scripps Miramar Ranch Planning Committee et al. 2018). As proposed, site development would require the removal of eucalyptus trees. However, as previously described in Section 5.17.3.1, community identification symbols or landmarks (including specific tree species) are primarily valued and experienced from public locations with a high number of viewers, such as major thoroughfares. In the context of the Community Plan and more specifically, the project area, eucalyptus trees as a community identification symbol or landmark have been deliberately established for public enjoyment along the Spring Canyon Road corridor. These existing clusters and groves have public value that contributes to the existing character of the

Spring Canyon Road corridor and broader Community Plan area. Conversely, the eucalyptus trees occurring on the project site are primarily visible to and experienced by nearby private viewers (residents) and motorists along Cypress Canyon Park Drive and other local neighborhood roads that experience lower volumes of daily traffic compared to larger thoroughfares.

Significance of Impact

Development of the project would include the removal of numerous on-site eucalyptus trees. As eucalyptus are a non-native species, have shallow roots capable of being uprooted (and can damage foundations), and are commonly understood to be fire hazards, eucalyptus trees removed during site development are not proposed to be replaced on site. Site development would result in the removal of eucalyptus trees that the Community Plan identifies as public resources to be preserved or replaced (the Community Plan's Summary of Plan Proposals includes the preservation of eucalyptus trees in all development proposals); however, the project site has limited visibility from Spring Canyon Road (a main thoroughfare). As established in Section 5.17.3.1, community identification symbol or landmarks (including specific tree species) are primarily valued and experienced from main community thoroughfares. Because the eucalyptus trees occurring on the project site are primarily visible to and experienced by nearby private viewers (residents) and motorists along Cypress Canyon Park Drive and other local neighborhood roads that experience lower volumes of daily traffic compared to larger thoroughfares, the visual value or significance of the onsite eucalyptus trees from a Community Plan perspective is lessened. As such, the removal of trees from the project site would not result in a significant impact to a community identification symbol or landmark tree. Impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.17.3.5 Issue 6: Change in Landform

Issue 6: Would the project result in the substantial change in the existing landform?

Thresholds

According to the City's CEQA Significance Determination Thresholds (City of San Diego 2022), a project is considered to have a significant impact if a project would result in more than 2,000 cubic yards of earth per graded acre by either excavation or fill. Grading of a smaller amount may still be

considered significant in highly scenic or environmentally sensitive areas. In addition, one or more of the following conditions must apply to meet this significance threshold:

1. The project would disturb steep hillsides in excess of the encroachment allowances of the ESL regulations (Land Development Code Chapter 14, Article 3, Division 1).
2. The project would create manufactured slopes higher than 10 feet or steeper than 2:1 (50%).
3. The project would result in a change in elevation of steep hillsides as defined by the SDMC Section 113.0103 from existing grade to proposed grade of more than 5 feet by either excavation or fill, unless the area over which excavation or fill would exceed 5 feet is only at isolated points on the site.
4. The project design includes mass terracing of natural slopes with cut or fill slopes in order to construct flat-pad structures.

However, the above conditions may not be considered significant if one or more of the following apply:

1. The grading plans clearly demonstrate, with both spot elevations and contours, that the proposed landforms will very closely imitate the existing on-site landform and/or the undisturbed, pre-existing surrounding neighborhood landforms. This may be achieved through "naturalized" variable slopes.
2. The grading plans clearly demonstrate, with both spot elevations and contours, that the proposed slopes follow the natural existing landform, and no point vary substantially from the natural landform elevations.
3. The proposed excavation or fill is necessary to permit installation of alternative design features such as step-down or detached buildings, non-typical roadway or parking lot designs, and alternative retaining wall designs which reduce the projects overall grading requirements.

Impact Analysis

As shown in Figure 3-1, manufactured slopes would nearly surround the proposed residential development. While manufactured slopes along the north, south, and west project boundaries would be higher than 10 feet, all manufactured slopes would be constructed at a 2:1 slope or flatter. The project grading plan identifies isolated areas/slopes along the northern development footprint (mostly around proposed basins) and the rear yards of select residential lots in the southern portion of the proposed residential development that would be constructed at a more moderate 3:1or 4:1 ratio. In addition, grading of the project site would require a total cut of 558,043 cubic yards and fill of 539,543 cubic yards of soil (see Chapter 3, Project Description). Therefore, the project would result in more than 2,000 cubic yards of earth per graded acre, would disturb steep hillsides in

excess of the encroachment allowances of the ESL regulations, would create manufactured slopes higher than 10 feet, and would result in a change in elevation of steep hillsides as defined by the SDMC from existing grade to proposed grade of more than 5 feet by either excavation or fill. The project would exceed the City's significance thresholds for landform alterations.

The proposed grading of the project site is designed to retain approximately 11.71 acres of existing open space. While the project site includes steep hillsides that would require alteration to accommodate the residential development footprint, and steeper graded terrain is proposed to permit installation of retaining walls, the proposed slopes on site would be designed to integrate into existing contours of adjacent hilly terrain (so as to be perceived as a visual continuation of existing landforms) to the extent practicable. However, as indicated in the section exhibits prepared as a component of the project grading plan (see Figure 5.17-11), proposed grading would generally create steep slopes that would vary from the more consistently sloped landform of on-site and off-site terrain (see Figure 2-1, which includes existing contour lines). Further, in certain locations, proposed cut and fill would create manufactured terrain requiring retainment that would not be considered "naturalized."

While the visual effect of proposed grading and creation of manufactured slopes would be greatest immediately following the completion of construction, implementation of the proposed landscape plan would soften the introduction of new slopes and help integrate new terrain with existing nearby slopes. The proposed landscape plan envisions the planting of various slope trees (24-inch box) off the rear yards of residences in the northern portion of the project and near proposed basins, as well as parkway, accent, and large-canopy trees along new internal access roads. Once established, new trees would create a denser (and non-invasive) ridgeline tree aesthetic somewhat similar to existing conditions. The proposed revegetation plan includes the planting of various shrub species associated with coastal sage scrub and coastal sage scrub-chapparal on the larger manufactured slopes in the northern and southern portions of the impact footprint that would, once established, closely mimic the coverage and species mix present on existing area slopes. Lastly, new sloped terrain in the northern, eastern, and southern portions of the grading footprint would be planted with hundreds of Nuttall's scrub oak (*Quercus dumosa*) trees that, once established, would help screen views to new homes and terrain and would add visual interest to the views from Mundial Street and nearby locations. Over time, this would help to mask the effects of the creation of new bare terrain and would help soften the introduction of new terrain into the existing landscape.

In summary, proposed site grading would disturb steep hillsides, create manufactured slopes higher than 10 feet, and result in a change in elevation of steep hillsides by more than 5 feet. While the effects of proposed grading would be softened by landscaping on manufactured slopes, proposed grading would meet one of more of the conditions established for the Issue 6 significance threshold.

Significance of Impact

The proposed project would result in a potentially significant temporary impact related to a substantial change in the existing landform.

Mitigation Measures

There is no feasible mitigation that would reduce the anticipated impact to existing landforms. Chapter 9, Alternatives, addresses alternatives that would reduce the landform alteration impacts. Refer to Chapter 9 for additional information.

Significance After Mitigation

No feasible mitigation is available to address the temporary significant impacts related to a substantial change in the existing landform. Project impacts related to a temporary substantial change in the existing landform would remain significant and avoidable.

5.17.3.6 Issue 7: Light or Glare

Issue 7: Would the project result in substantial light or glare which would adversely affect daytime or nighttime view in the area?

Thresholds

According to the City's Significance Determination Thresholds (City of San Diego 2022), a project is considered to have a significant impact if a 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 Land Development Code Section 12.07330(a)), and the project is adjacent to a major public roadway or public area.
- Shed substantial light onto adjacent, light-sensitive property or land use, or would emit a substantial amount of ambient light into the nighttime sky. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and industrial uses, and natural areas.

Impact Analysis

Lighting

The project site is located in a predominantly urbanized area that contains existing sources of interior and exterior lighting associated with existing single-family and multifamily residential

development surrounding the project site, as well as with street lighting along major arterials and local roadways. Development of the 40.56-acre project site would introduce lighting to a primarily undeveloped site featuring steep vegetated slopes and canyon bottoms and currently supporting an existing single-family residence with associated structures. With the exception of lighting associated with the existing single-family residence and associated structures, such as interior lighting and exterior security lighting, limited sources of lighting occur on site. New fixed lighting sources at the project site would include interior and exterior lighting associated with proposed residential uses and lighting within proposed on-site roadways.

All proposed lighting would be compliant with the standards contained in the City's Outdoor Lighting Regulations. Pursuant to SDMC Section 142.0740, all outdoor lighting fixtures "shall be installed in a manner that minimizes negative impacts from light pollution, including light trespass, glare, and urban sky glow, in order to preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination." Specifically, the SDMC requires the installation of "acceptable" lighting fixtures that are fully shielded and, with the exception of "period" style fixtures, directed downward. Further, new sources of lighting, including exterior mounted building lights, security lighting, landscaping, and accent lighting, are required to be operated with control systems to ensure that unnecessary lighting is not left on throughout the night. In addition, due to the project site's proximity to open space that supports sensitive biological resources, Section 142.0740(c)(6) requires exterior lighting to be limited to low level lights that are shielded. Additionally, the project would be required to comply with the Land Use Adjacency Guidelines due to the project's adjacency to the MHPA. Therefore, exterior lighting would be directed away from adjoining properties and would be of a low level so as to not unnecessarily illuminate off-site areas. Compliance with the SDMC would minimize and restrict project-related nighttime light pollution and light trespass onto adjacent properties.

Glare

The proposed structures would feature building materials including stucco, wood, brick, and stone. The use of reflective building materials and finishes, as well as reflective lighting structures and metallic surfaces, would be minimized to the extent feasible to impede the creation of project-generated glare. As previously stated, all proposed lighting would be installed in compliance with the standards contained in the City's Outdoor Lighting Regulations (SDMC Section 142.0740), which include measures to minimize the negative impacts of glare. Lastly, solar panels on residential rooftops are proposed under the project. However, modern solar panels are designed to be highly absorbing of incoming light to both maximum energy generation potential and minimize potential for reflective light (i.e., glare). Therefore, the project does not propose any features that would be characterized as creating a substantial new source of glare that would adversely affect daytime or nighttime views in the area.

Significance of Impact

Through compliance with the SDMC and Land Use Adjacency Guidelines, the proposed project would not introduce substantial sources of day or nighttime lighting. Proposed lighting on site would be fully shielded, directed downward, and would be of a low level/intensity in order to minimize light pollution and skyglow. Regarding glare, the project would not incorporate any features that would be characterized as creating a substantial source of glare that would adversely affect daytime or nighttime views in the area. Thus, the project would not result in a significant impact to daytime or nighttime views due to light and glare. Therefore, impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.



SOURCE: SANGIS 2017

FIGURE 5.17-1

Existing Visual Character Key Map

EIR for the Renzulli Estates Project, City of San Diego, California

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Photo A



Photo B



Photo C



Photo D

FIGURE 5.17-2

Existing Visual Character: Project Site

EIR for the Renzulli Estates Project, City of San Diego, California

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Photo E



Photo F



Photo G



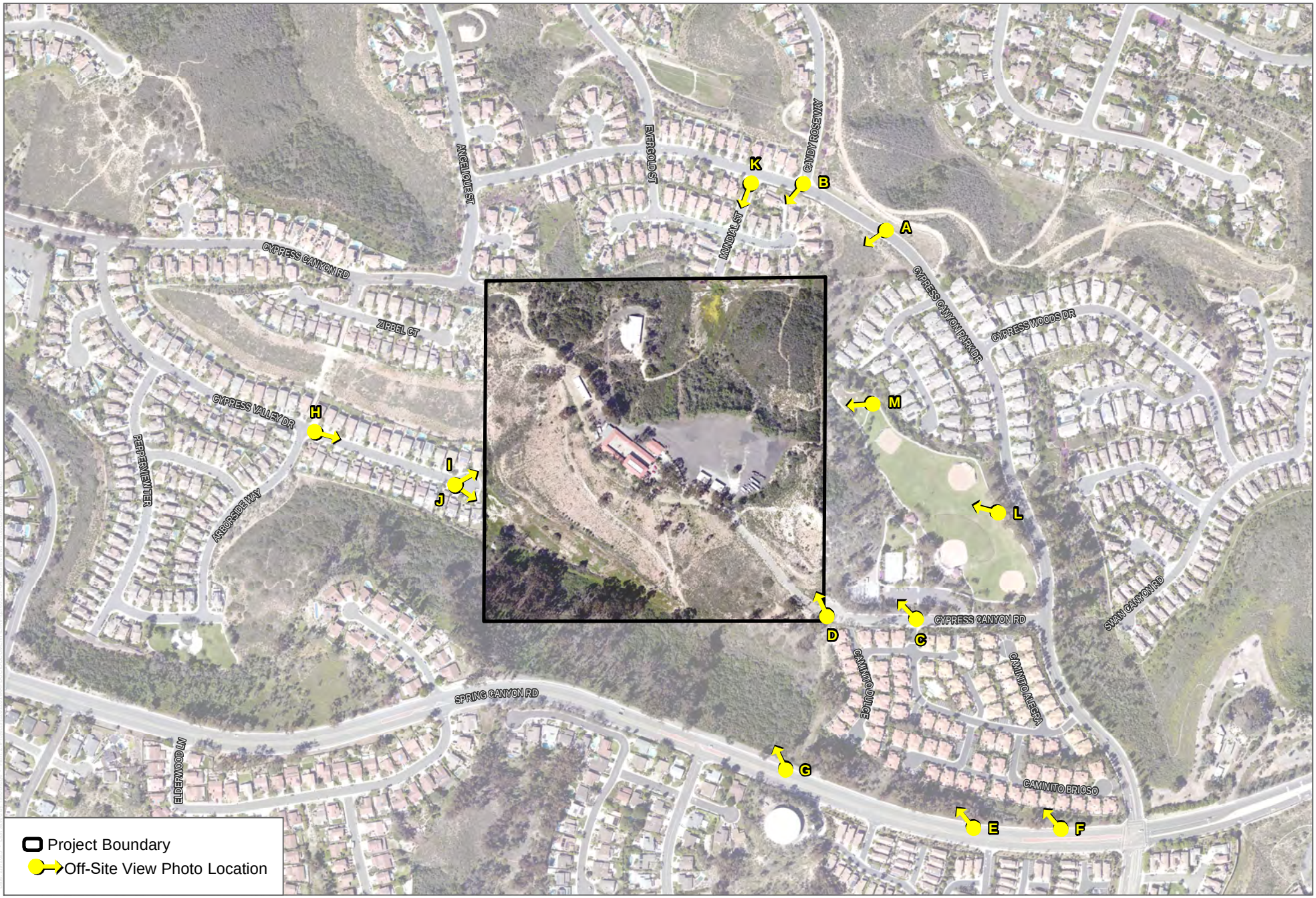
Photo H

FIGURE 5.17-3

Existing Visual Character: Surrounding Area

EIR for the Renzulli Estates Project, City of San Diego, California

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SOURCE: SANGIS 2017

0 250 500 Feet

FIGURE 5.17-4

Off-Site Views Photo Location Key Map

EIR for the Renzulli Estates Project, City of San Diego, California

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Photo A



Photo B

FIGURE 5.17-5

Cypress Canyon Park Drive Views

EIR for the Renzulli Estates Project, City of San Diego, California

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Photo C



Photo D

FIGURE 5.17-6

Cypress Canyon Road Views

EIR for the Renzulli Estates Project, City of San Diego, California

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Photo E



Photo F



Photo G

FIGURE 5.17-7

Spring Canyon Road Views

EIR for the Renzulli Estates Project, City of San Diego, California

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Photo H



Photo I



Photo J

FIGURE 5.17-8

Cypress Valley Drive Views

EIR for the Renzulli Estates Project, City of San Diego, California

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Photo K

FIGURE 5.17-9

Mundial Street Views

EIR for the Renzulli Estates Project, City of San Diego, California

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Photo L



Photo M

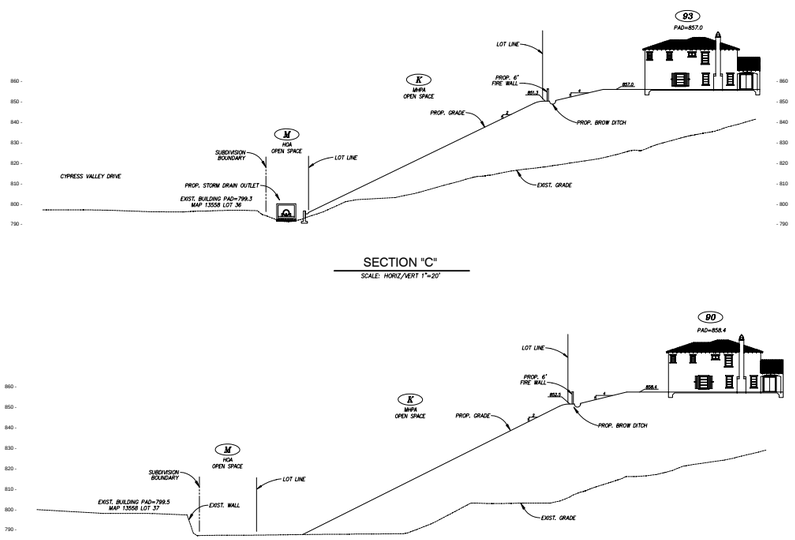
FIGURE 5.17-10

Cypress Canyon Park Views

EIR for the Renzulli Estates Project, City of San Diego, California

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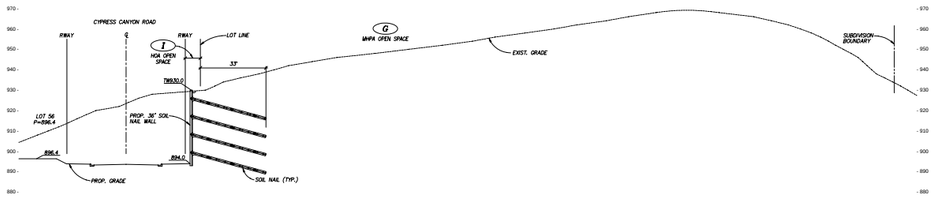


SECTION "C"

SCALE: HORZ/VERT 1"=20'

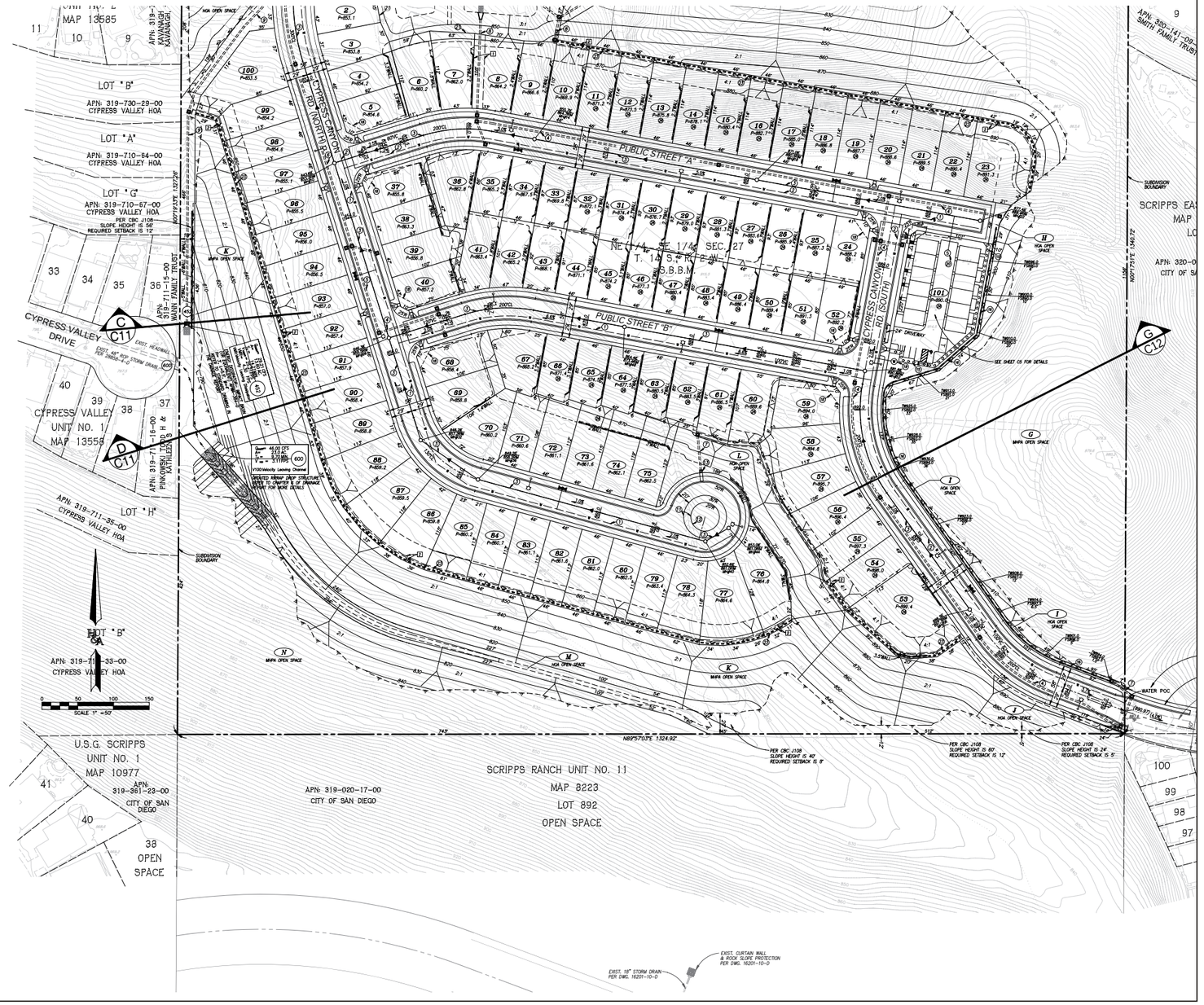
SECTION "D"

SCALE: HORZ/VERT 1"=20'



SECTION "G"

SCALE: HORZ/VERT 1"=20'



SOURCE: Hunsaker & Associates 2024

FIGURE 5.17-11

Cross Sections

EIR for the Renzulli Estates Project, City of San Diego, California

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5.18 WATER QUALITY

This section describes the existing water quality conditions of the proposed Renzulli Estates Project (project) site, identifies associated regulatory requirements, and evaluates potential impacts related to implementation of the project. The following analysis is based, in part, on the Stormwater Quality Management Plan, prepared by Hunsaker and Associates San Diego Inc. (October 2023) and included as Appendix I1 of this environmental impact report.

5.18.1 EXISTING CONDITIONS

Existing Physical Conditions

The project site is within the San Diego Water Basin. The San Diego Regional Board Basin Plan identifies objectives and policies to maintain and protect water quality within the basin and designates beneficial uses for water. The Basin Plan provides water quality objectives, including water segments within the plan boundaries that have indicator bacteria pursuant to Clean Water Act Section 303(d) (RWQCB 2021). The San Diego Water Basin identifies the Los Peñasquitos Lagoon within the Peñasquitos Hydrologic Unit as a 303(d) listed water, with a total maximum daily load for sedimentation and siltation (RWQCB 2021).

Within the San Diego Water Basin, the project site is in the Peñasquitos Hydrologic Unit and the Los Peñasquitos Watershed Management Area (WMA). The Los Peñasquitos WMA is 94 square miles (60,160 acres) and encompasses the drainage areas of Los Peñasquitos Creek, Carmel Creek, and Carroll Canyon Creek (Regional Water Management Group 2019). The Los Peñasquitos WMA contains one water storage facility, Lake Miramar, and one groundwater basin, the Poway Valley Groundwater Basin. The Los Peñasquitos WMA consists of two hydrologic areas (HAs): Miramar Reservoir (906.10) and Poway (906.20). The project site is within the Poway HA (906.20). The Poway HA is east of the Miramar Reservoir HA and is covered entirely by the upper portion of the Los Peñasquitos Creek sub-watershed (County of San Diego 2017). The majority of surface runoff in the Poway HA is eventually directed into Los Peñasquitos Creek by way of a number of smaller creeks and tributaries. Los Peñasquitos Creek then makes its way through the Los Peñasquitos Lagoon before being discharged into the Pacific Ocean. The beneficial uses of the Poway HA include municipal and domestic water supply and agricultural water supply. A potential beneficial use of the Poway HA is industrial process water supply (RWQCB 2021). The Los Peñasquitos Creek Watershed includes Los Peñasquitos Creek and Poway Creek, which are both 303(d) listed waters. The following two total maximum daily loads have been adopted in the Los Peñasquitos WMA (RWQCB 2021):

- The Pacific Ocean Shoreline at Torrey Pines State Beach at Del Mar was 303(d) listed in 2010 for coliform as impairing shellfish beneficial use.

- The Los Peñasquitos Lagoon was 303(d) listed in 2012 for sedimentation and siltation as impairing beneficial use.

A total of 92% of the waterbodies in the Los Peñasquitos WMA are not impaired or have not been assessed by the RWQCB (RWQCB 2021).

The project site contains development in the center surrounded by undeveloped land on steep slopes and hillsides with native vegetation communities and disturbed areas. One existing residence with two associated sheds and one large asphalt area are in the center of the project site. The site is largely surrounded by residential development, aside from some open space to the west and Cypress Canyon Park to the east. The existing residence is vacant and there are no known pollutants being discharged by the existing development. As identified in the Phase I Environmental Site Assessment and Phase II Environmental Site Assessment (Appendices G2 and G3), there is a large amount of undocumented fill on site containing total petroleum hydrocarbons (TPH), lead, and arsenic. Soil samples were collected as part of the Phase II Environmental Site Assessment, and it was determined that there is low likelihood that groundwater has been impacted from the undocumented fill on site because none of the samples were above the residual saturation criteria for TPH. There are no known water quality issues associated with the project site.

The project site is within a 40.56-acre hydrologic catchment that primarily consists of natural grades and hills covered by native vegetation and shrubs. The project site's existing drainage is bisected into north and south areas by a ridgeline through the center of the project site, running from the northwest to the southeast. In the southern drainage area, the primary portion of the total runoff drains to the southeast storm drain headwall at Cypress Valley Drive. Another small drainage area drains to the east entry at Cypress Canyon Road and continues to gutter-flow to the inlet at Cypress Canyon Road and the Cypress Canyon Park Drive intersection. The north drainage area was further divided into six sub-catchbasins based on topography and drains, separate from the existing inlets and catchbasins located at Cypress Canyon Road, Mundial Street, and other nearby basins (Appendix I2).

5.18.2 REGULATORY FRAMEWORK

Federal

Clean Water Act

The Clean Water Act (CWA) was designed to restore and maintain the chemical, physical, and biological integrity of waters in the United States. The CWA also directs state governments to establish water quality standards for all waters of the United States, and to review and update such standards on a triennial basis (i.e., every 3 years). Other provisions of the CWA related to basin

planning include Section 208, which authorizes the preparation of waste treatment management plans, and Section 319, which mandates specific actions for the control of pollution from nonpoint sources. The U.S. Environmental Protection Agency (EPA) has delegated responsibility for implementation of portions of the CWA to the State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs), including water quality control planning and control programs such as the National Pollutant Discharge Elimination System (NPDES) program. The NPDES program is a set of permits designed to implement the CWA. The permits apply to various activities that generate pollutants with potential to impact water quality.

CWA Section 303 requires states to adopt water quality standards for all surface waters of the United States. CWA Section 304(a) requires EPA to publish water quality criteria that accurately reflect the latest scientific knowledge on the kind and extent of all effects on health and welfare that may be expected from the presence of pollutants in water. Where multiple uses exist, water quality standards must protect the most sensitive use. Water quality standards are typically numeric, although narrative criteria based on biomonitoring methods may be employed where numerical standards cannot be established or where narrative criteria are needed to supplement numerical standards. CWA Section 303(c)(2)(b) requires states to adopt numerical water quality standards for toxic pollutants for which EPA has published water quality criteria and that reasonably could be expected to interfere with designated uses of a water body.

State

Porter–Cologne Water Quality Control Act

The Porter–Cologne Water Quality Control Act authorizes the SWRCB to adopt, review, and revise policies for all waters of the state (including surface water and groundwater), and directs RWQCBs to develop regional basin plans. California Water Code Section 13170 authorizes the SWRCB to adopt water quality control plans on its own initiative. The Water Quality Control Plan for the San Diego Basin (Basin Plan) is designed to preserve and enhance the quality of water resources in the San Diego region for the benefit of present and future generations. The purpose of the Basin Plan is to designate beneficial uses of the region's surface water and groundwater, designate water quality objectives for the reasonable protection of those uses, and establish an implementation plan to achieve the objectives (RWQCB 2021).

All projects resulting in discharges, whether to land or water, are subject to California Water Code Section 13263 and are required to obtain approval of Waste Discharge Requirements (WDRs) from the RWQCBs. Land- and groundwater-related WDRs (i.e., non-NPDES WDRs) regulate discharges of process and wash-down wastewater and privately or publicly treated domestic wastewater. WDRs

for discharges to surface waters also serve as NPDES permits. These regulations are applicable to the project.

NPDES Construction General Permit

Construction activities exceeding 1 acre (or meeting other applicable criteria) are subject to pertinent requirements under the Construction General Permit. This permit is issued by the SWRCB, pursuant to authority delegated by the EPA, as previously noted. Specific conformance requirements include implementing a stormwater pollution prevention plan (SWPPP), an associated Construction Site Monitoring Program, employee training, and minimum best management practices (BMPs), as well as a Rain Event Action Plan for applicable projects (e.g., those in Risk Categories 2 or 3). Under the Construction General Permit, project sites are designated as Risk Level 1 through 3 based on site-specific criteria (e.g., sediment erosion and receiving water risk), with Risk Level 3 sites requiring the most stringent controls. Based on the site-specific risk level designation, the SWPPP and related plans/efforts identify detailed measures to prevent and control the off-site discharge of pollutants into stormwater runoff. Depending on the risk level, these may include efforts such as minimizing/stabilizing disturbed areas, mandatory use of technology-based action levels, effluent and receiving water monitoring/reporting, and advanced treatment systems. Specific pollution control measures require the use of best available technology that is economically achievable and/or best conventional pollutant control technology levels of treatment, with these requirements implemented through applicable BMPs. Although site-specific measures vary with conditions, such as risk level, proposed grading, and slope/soil characteristics, detailed guidance for construction-related BMPs is provided in the permit and related local standards (as outlined below), as well as additional sources, including EPA's National Menu of Best Management Practices (BMPs) for Stormwater – Construction (EPA 2024), and stormwater best management practices handbooks published by the California Stormwater Quality Association. Specific requirements for the project under this permit would be determined during SWPPP development after completion of project plans and application submittal to the SWRCB.

NPDES Groundwater Permit

Although shallow groundwater is generally not expected to occur on site, if project-related construction activities entail the discharge of extracted groundwater into receiving waters, the applicant would be required to obtain coverage under a Groundwater Permit. This permit is issued by the RWQCB after a public hearing and must be obtained prior to construction. It is not anticipated that the proposed project would require a groundwater permit. Conformance with this permit is generally applicable to all temporary and certain permanent groundwater discharge activities, with exceptions as noted in the permit fact sheet. Specific requirements for permit conformance include (1) submittal of appropriate application materials and fees; (2) implementation of pertinent

(depending on site-specific conditions) monitoring/testing, disposal alternative, and treatment programs; (3) provision of applicable notification to the associated local agency prior to discharging to a municipal storm drain system; (4) conformance with appropriate effluent standards (as outlined in the permit); and (5) submittal of applicable documentation (e.g., monitoring reports).

NPDES Municipal Permit

The NPDES 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 providing a consistent set of requirements for all co-permittees, and 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 and providing implementation strategies and schedules to address those priorities. Municipal Permit conformance entails considerations such as receiving-water limitations (e.g., local 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 BMPs, including low-impact-development measures to avoid, minimize, and/or mitigate effects, such as increased erosion and off-site sediment transport (sedimentation), hydromodification, and the discharge of pollutants in urban runoff; and (4) using appropriate monitoring/assessment, reporting, and enforcement efforts to ensure proper implementation, documentation, and (as appropriate) modification of permit requirements. The City of San Diego (City) has implemented a number of regulations to ensure conformance with these requirements, as outlined below under "Local."

Local

San Diego Basin Plan

The Basin Plan adopted by the RWQCB sets forth water quality objectives for constituents that could potentially cause an adverse impact on the beneficial uses of water. Specifically, the San Diego Basin Plan is designed to accomplish the following (RWQCB 2021):

- Designate beneficial uses for surface water and groundwater.
- Set the 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.

- Describe implementation programs to protect the beneficial uses of all waters within the region.
- Describe surveillance and monitoring activities to evaluate the effectiveness of the Basin Plan.

The Basin Plan incorporates by reference all applicable SWRCB and RWQCB plans and policies.

City of San Diego Stormwater Standards Manual

Stormwater BMP standards for projects in the City are outlined in the City's Stormwater Standards Manual (City of San Diego 2021). The Stormwater Standards Manual constitutes the City's implementation of the Regional Municipal Separate Storm Sewer System (MS4) Permit and Stormwater Management and Discharge Control Ordinance (San Diego Municipal Code Section 43.0301 et seq.). Specific requirements for implementing BMPs vary based on the project type and amount of impervious surface proposed, but include on-site post-construction stormwater requirements for standard projects and priority development projects. The Stormwater Standards Manual also provides procedures for planning, preliminary design, selection, and design of permanent stormwater BMPs based on the performance standards provided in the MS4 Permit.

The City's Stormwater Requirements Applicability Checklist (Form DS-560) is used to determine whether a project is a priority development project; a standard development project; or exempt from permanent, post-construction stormwater BMP requirements (City of San Diego 2021). Post-construction BMP requirements in the Stormwater Standards Manual and the Regional MS4 Permit apply to new development or significant redevelopment projects that exceed size thresholds and/or fit under specific use or location categories. The size threshold is typically the amount of impervious area added and/or replaced. An additional criterion requires post-construction BMPs when a project results in the disturbance of 1 or more acres of land and is expected to generate pollutants after construction (even if there is no addition or replacement of impervious area).

City Stormwater Management and Discharge Control Ordinance

The purpose of San Diego Municipal Code Sections 43.0301 to 43.0312 (Stormwater Management and Discharge Control) is to restore and maintain the water quality of receiving waters and ensure the health, safety, and general welfare of the citizens of the City. The ordinance prohibits non-stormwater discharges, including spills, dumping, and disposal of materials other than stormwater, into the MS4, and reduces pollutants in discharges from the MS4 to receiving waters, to the maximum extent practicable, in a manner consistent with the CWA. The ordinance also requires implementation of BMPs contained in the Jurisdictional Runoff Management Plan, including erosion and sediment control BMPs as required by the Stormwater Standards Manual, and describes enforcement authorities and remedies that can be used in instances of noncompliance.

City of San Diego General Plan

The City's General Plan addresses water quality concerns in the Public Facilities, Services, and Safety Element, and the Conservation Element, as summarized below. Consistency with the goals and policies in the following elements can be found in Table 5.1-2 of Section 5.1, Land Use, of this environmental impact report.

Public Facilities, Services, and Safety Element

The Public Facilities, Services, and Safety Element contains a number of goals and policies related to the provision of adequate public facilities and services for existing and proposed development. For stormwater, these involve efforts to provide appropriately designed and sized infrastructure, ensure adequate conveyance capacity, protect water quality, and provide conformance with applicable regulatory standards (e.g., the NPDES) (City of San Diego 2024a).

Stormwater Infrastructure Policies

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 Permit standards.

PF-G.2 Install infrastructure that, where feasible, includes components to capture, minimize, and prevent pollutants in urban runoff from reaching receiving waters and our potable water supplies.

PF-G.3 Meet or exceed regulatory mandates in a cost-effective manner monitored through performance measures.

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.

Conservation Element

The Conservation Element provides a number of goals and policies related to preserving and protecting watersheds and natural drainage features, minimizing runoff and related pollutant generation during and after construction activities, and protecting drinking water resources (City of San Diego 2024b).

Open Space and Landform Preservation

CE-B.2 Apply the appropriate zoning and Environmentally Sensitive Lands (ESL) regulations to limit development of floodplains, sensitive biological areas including wetlands, steep hillsides, canyons, and coastal lands.

CE-B.4 Limit and control runoff, sedimentation, and erosion both during and after construction activity.

Water Resources Management

CE-D.2 Protect drinking water resources by implementing guidelines for future development that may affect water supply watersheds, reservoirs and groundwater aquifers. The guidelines should address site design, Best Management Practices (BMPs) and storm water treatment measures.

Urban Runoff Management

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.

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.

5.18.3 IMPACT ANALYSIS

5.18.3.1 Issue 1 and 2: 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 proposal 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?

Thresholds

According to the City's California Environmental Quality Act Significance Determination Thresholds (City of San Diego 2022), the assessment of water quality is based on the following:

- Adherence to the City's Stormwater Standards.

Compliance with applicable City water quality standards is ensured through permit conditions provided through land development review engineering. Adherence to the City's stormwater standards is thus considered adequate to preclude surface water quality impacts (City of San Diego 2021). Because the project would not involve activities that could directly affect groundwater quality (e.g., underground fuel storage tanks or septic systems), potential impacts to groundwater quality would be limited to the percolation of project-related surface runoff and associated pollutants (e.g., in pervious portions of the proposed storm drain system). Accordingly, conformance with the City's storm water standards is the applicable threshold for both surface water and groundwater resources.

Impact Analysis

Potential project-related pollutant discharge and water quality impacts would be associated with short-term construction activities and long-term maintenance and occupation of the project site, which are discussed below.

Short-Term Construction Impacts

Water quality impacts occur when construction activities, such as demolition, grading, and excavation, create additional sources of polluted runoff that could have short-term impacts on surface water quality. Sources of polluted runoff from construction include heavy metals, organic compounds, trash and debris, oxygen-demanding substances, oil and grease, bacteria and viruses, pesticides, sediments, and nutrients. Pollutants associated with construction would degrade water

quality if those pollutants get washed into surface waters. Sediment is often the most common pollutant associated with construction sites because of earth-moving activities and areas of exposed soil. Hydrocarbons, such as fuels; asphalt materials; oils; and hazardous materials, such as paints and concrete, discharged from construction sites could also result in impacts downstream. Debris and trash could be washed into existing storm drainage channels to downstream surface waters.

The project would involve demolition of an existing large residence and associated structures, and then site preparation of the project site (i.e., grading, soil import, trenching for dry and wet utilities, and surface improvements) for vertical building construction. Under the NPDES permit, BMPs are mandated through the preparation of SWPPPs for construction sites where grading would be greater than 1 acre to reduce the occurrence of pollutants in surface water. SWPPPs are submitted to the RWQCB prior to ground-disturbing activities and set forth the measures that will be employed during construction to avoid runoff into surface waters. Project temporary construction BMPs typically include waste disposal, vehicle and equipment maintenance, proper materials storage, minimization of hazardous materials, and proper handling and storage of hazardous materials. Typical erosion and sediment control BMPs include silt fences, fiber rolls, gravel bags, temporary desilting basins, velocity check dams, temporary ditches or swales, stormwater inlet protection, and soil stabilization measures. Implementation of these state-mandated measures, and implementation of the required SWPPP for the proposed project, would ensure that short-term impacts from construction-related activities would not violate any water quality standards or WDRs, and not further contribute to water quality impacts identified in the CWA Section 303(d) List.

As noted above, the Los Peñasquitos Creek Watershed includes two 303(d) listed waters: the Los Peñasquitos Creek and Poway Creek. Poway Creek is impaired for metals, nitrogen/phosphorus, and total toxic chemicals, and Los Peñasquitos Creek is impaired for degraded aquatic life and pesticides. The project would comply with all applicable federal, state, and local laws and regulations pertaining to the management of hazardous materials, which would prevent the addition of metals, nitrogen/phosphorus, total toxic chemicals, and pesticides into the watershed. Although not specifically within the Los Peñasquitos Creek Watershed, the Los Peñasquitos Creek Lagoon is identified in the Basin Plan as impaired for sedimentation and siltation (RWQCB 2021). As described, the project would provide BMPs, to be outlined in the SWPPP, to control for erosion and sediment as a result of construction activities. The project is not anticipated to contribute to existing water quality impairments.

Further, the project would incorporate construction BMPs in accordance with the City's Stormwater Standards Manual. The project would also be required to comply with all of the City's stormwater standards, including San Diego Municipal Code Sections 43.0301 to 43.0312, which prohibit non-stormwater discharges, including spills, dumping, and disposal of materials other than stormwater

to the MS4, and reduces pollutants in discharges from the MS4 to receiving waters, to the maximum extent practicable, in a manner consistent with the CWA.

With implementation of a SWPPP and compliance with applicable water quality requirements, runoff from the project site during construction would not adversely affect surface waters or water quality.

Long-Term Operation Impacts

As noted above, Poway Creek is impaired for metals, nitrogen/phosphorus, and total toxic chemicals, and Los Peñasquitos Creek is impaired for degraded aquatic life and pesticides. Additionally, the Los Peñasquitos Creek Lagoon is identified in the Basin Plan as impaired for sedimentation and siltation (RWQCB 2021). Long-term operation of the project is not anticipated to introduce metals, nitrogen/phosphorus, total toxic chemicals, or pesticides into the watershed because the project would comply with all applicable federal, state, and local laws and regulations pertaining to the management of hazardous materials. Additionally, direct impacts to aquatic life would not occur during operations because operations would not involve major ground-disturbing activities that would have potential to cause erosion or increase sedimentation. Further, runoff during operation would be controlled by project stormwater design, reducing potential pollutant discharge from the project. During operation of the project, all on-site runoff would be collected through the existing and proposed catch basins and then routed to one of the biofiltration basins that would detain and attenuate 100-year peak flows per City design standards.

Under the proposed developed conditions, drainage improvements would include curb inlets, storm drains, and cleanouts along the proposed streets, which would convey storm runoff to the two proposed biofiltration basins. The proposed drainage of the project would collect and convey runoff associated with the proposed slope areas directly into existing storm drains located downstream and surrounding the project site. After the majority of the runoff is treated and detained by the proposed biofiltration basins, the outflow would converge with the bypass storm drain and discharge into the existing 24-inch-diameter storm drain within Mundial Street to the north and Cypress Canyon to the south into an underground storm drain at the end of Cypress Valley Drive, adjacent to the project site to the east.

Implementation of proposed BMPs, recommendations in the project-specific Stormwater Quality Management Plan (Appendix I1) and Drainage Study (Appendix I2), and preparation and implementation of the required SWPPP would ensure that the proposed project would comply with regulatory ordinances and with the standards set forth in the City's Stormwater Standards Manual, which is the jurisdiction-specific BMP manual for the City. Site-specific source-control BMPs would include prevention of illicit discharges, storm drain stenciling, integrated pest management principles, and efficient landscape and irrigation design. In addition, water quality treatment BMPs

would include proposed biofiltration basins, to be located in the western and northern portions of the project site. The biofiltration basin at the northern portion of the project site would discharge into the existing storm drain within Mundial Street to the north, and the biofiltration basin in the western portion of the project site would discharge into the existing storm drain within Cypress Canyon Drive to the south.

The proposed water quality BMPs would be maintained in perpetuity by the owner/permittee through the homeowner's association to ensure that long-term operations would continue to provide water quality control. Project-specific site design, source control, and treatment control BMPs; low-impact-development practices; and project design measures would be implemented to ensure that water quality would not degrade beyond existing conditions. Therefore, runoff from the project site would not adversely affect surface waters or water quality, or discharge pollutants to an already impaired water body.

Significance of Impact

Through implementation of project-specific site design, source controls, treatment control BMPs, low-impact-development practices, project design measures, and related maintenance efforts, and through conformance with City stormwater standards and associated requirements, potential pollutant discharge and water quality impacts associated with construction and operation of the project would be less than significant.

Mitigation Measures

Because impacts would be less than significant, no mitigation measures would be required.

5.19 WILDFIRE

This section describes the existing wildfire conditions of the proposed Renzulli Estates Project (project) site, identifies regulatory requirements, and evaluates potential impacts related to implementation of the project. The following discussion is based on the Fire Fuel Load Modeling Report (FFLMR) prepared by Dudek (May 2025) and included as Appendix L3 of this environmental impact report (EIR), the Fire Service Letter included as Appendix L1, and the Evacuation Plan prepared by Dudek (October 2023) included as Appendix N of this EIR.

5.19.1 EXISTING CONDITIONS

Existing Physical Conditions

The majority of the project site is undeveloped, with some development present in the center of the site. More specifically, the project site supports a large existing residence and several outbuildings, with two associated sheds. The structures are accessible via the segment of Cypress Canyon Road that connects to Cypress Canyon Park Drive to the southeast. In addition, two three-car garages and various abandoned vehicles, RVs, and trailers are located in the center of the project site, near the existing residence. Additionally, in the center of the site is a cleared area that has been paved. Various unpaved roads also extend throughout the project site. The Multi-Habitat Planning Area, the hardline preserve developed by the City of San Diego (City) and established by the San Diego Multiple Species Conservation Program, covers most of the project site. The project site is surrounded by residential uses, as well as some recreational and open space.

Fire Service

The site is located within San Diego Fire–Rescue Department (SDFD) jurisdiction and is currently served by SDFD. The project is located within the Scripps Miramar Ranch Community Plan (Community Plan). SDFD Fire Station 37, located west of the project site at 11640 Spring Canyon Road, serves the Community Plan area and the project site (Appendix L1, Fire Service Letter). SDFD Fire Station 37 has a fire engine, brush engine, and paramedic (City of San Diego 2021a). Refer to Section 5.14, Public Services and Facilities, for further details.

Water Supply and Infrastructure

Water service to the project site is provided by the City's Public Utilities Department. The project would connect to existing 12-inch water mains adjacent to the site at Cypress Canyon Road/Angelique Street, and Cypress Canyon Road. Water is currently supplied to the project site from the City's public water system**.** Refer to Section 5.15, Public Utilities, for further details.

Fire Hazard Mapping

The California Department of Forestry and Fire Protection (CAL FIRE) Fire and Resource Assessment Program database includes map data documenting areas of significant fire hazards in the state. These maps categorize geographic areas of the state into different Fire Hazard Severity Zones (FHSZs), ranging from Moderate to Very High. CAL FIRE uses FHSZs to classify anticipated fire-related hazards for the entire state and includes classifications for State Responsibility Areas, Local Responsibility Areas, and Federal Responsibility Areas. Fire hazard severity classifications take into account vegetation, topography, weather, crown fire production, and ember production and movement. As shown in Figure 5.19-1, Fire Hazard Severity Zone, the entirety of the project site is located within a Very High FHSZ (City of San Diego 2021b).

Fire History

Wildfire is a continuous threat in Southern California and is particularly concerning in the wildland–urban interface (WUI), the geographic area where urban development either abuts or intermingles with wildland or vegetative fuels. Due to climate, vegetation, and topography, the City is subject to both wildland and urban fires. The region's climate and increasingly severe dry periods result in large areas of dry vegetation that provides fuel for wildland fires. Late summer and fall are the most critical seasons for wildland fires when Santa Ana winds bring hot, dry desert air from the east into the region. When the high air temperature, low humidity, and powerful winds combine with dry vegetation, the result can be large-scale fire events. Since these winds push wildland fires westward toward denser development, Santa Ana wind–driven fires have the potential to result in a greater risk of property damage. The City contains over 900 linear miles of WUI due to established development along the open space areas and canyons within urban and suburban areas (City of San Diego 2018). Due to the existing vegetation and open space being located adjacent to the residential development, the project site represents a WUI area.

Fire history data provides valuable information regarding fire spread, fire frequency, ignition sources, and vegetation/fuel mosaics across a given landscape. Fire frequency, behavior, and ignition sources are important for fire response and planning purposes. One important use for this information is as a tool for pre-planning. It is advantageous to know which areas may have burned recently and, therefore, may provide a tactical defense position or what type of fire burned on the site and how a fire may spread. According to available data from the CAL FIRE Fire and Resource Assessment Program (CAL FIRE 2018a) and as shown in Figure 5.19-2, Fire History Map, approximately 49 fires have burned within 5 miles of the project area since the beginning of the historical fire data record. These fires occurred between 1910 and 2007. There has been one fire in the historical record that burned onto the project site, which occurred in 1943. SDFD may have data

regarding additional smaller fires (less than 10 acres) that have occurred near or on the site that are not included in CAL FIRE's dataset (Appendix L3).

Based on an analysis of this fire history dataset, along with changes over the last few decades that resulted in the conversion of fuels to lower flammability urbanization, the project area is expected to be subject to wildfire that may include smaller fires during typical weather conditions, has the potential for larger wildfires during extreme weather conditions, but lacks consistent fuel beds to result in a large flaming front on the project site (Appendix L3).

Vegetation Communities and Land Covers

The site's vegetation fire risk is primarily determined by development-adjacent vegetation that would be preserved in the open space directly adjacent to the proposed brush management zones (BMZs). The growth of vegetation types/fuel models is influenced by aspect (orientation), soil constituents, soil depth, soil moisture, and weather. The vegetation occurring on the slopes adjacent to the site is part of the site's fuel load, an important component of the site's wildfire risk assessment (Appendix L3). These existing vegetation communities and land cover types are described in detail in the Biological Technical Report (Appendix D) and in Section 5.4, Biological Resources.

The existing vegetation communities and land covers on the project site support a total of 13 vegetation communities, including 6 native vegetation communities, 4 non-native vegetation communities/land cover types, and 3 wetland communities. Native and non-native upland vegetation communities and land covers present within the project site include Diegan coastal sage scrub (including disturbed), Diegan coastal sage scrub (*Baccharis*-dominated), coastal sage–chaparral transition, flat-topped buckwheat scrub, southern mixed chaparral (including disturbed), scrub oak chaparral, emergent wetland, natural flood channel, disturbed habitat, eucalyptus woodland, developed land, *Arundo*-dominated disturbed habitat, and herbaceous wetland (artificial) (see Figure 5.4-1).

Topography and Terrain

Topography affects wildfire movement and spread. Steep terrain typically results in faster fire spread due to preheating (and drying) of uphill vegetation. Flat areas typically result in slower fire spread, absent of windy conditions. Topography may form unique conditions that result in concentrated winds or localized fire funneling, such as saddles, canyons, and chimneys (land formations that collect and funnel heated air upward along a slope). Similarly, terrain may slow the spread of fire. For example, fire generally moves slower downslope than upslope. Terrain may buffer or redirect winds away from some areas based on canyons or formations on the landscape.

Topography varies greatly throughout the project site but is generally steep and hilly with lowland canyon bottoms in the southern and northern portion of the parcel (see Figure 2-1); these areas receive much of the runoff from the surrounding hills and support wetland vegetation or drainages. A generally flat mesa exists in the center of the parcel where the existing residence is located. The elevation in the project site ranges from approximately 760 feet to 980 feet above mean sea level. The project site is located within and adjacent to the Multi-Habitat Planning Area, which conserves biological habitats. The project is not within the City Coastal Zone (City of San Diego 2008).

Climate, Weather, and Wind

San Diego and the project site are influenced by the Pacific Ocean and are frequently under the influence of a seasonal, migratory subtropical high-pressure cell known as the "Pacific High." Wet winters and dry summers, with mild seasonal changes, characterize the Southern California climate. This climate pattern is occasionally interrupted by extreme periods of hot weather, winter storms, or dry, easterly Santa Ana winds. The average high temperature for the San Diego area is approximately 72° F, with average highs in the summer and early fall months (July – October) reaching 82° F. The average precipitation for the area is approximately 12.5 inches per year, with the majority of the rainfall concentrated in the months of November to April, while smaller amounts of rain are experienced during the rest of the year (World Weather Online 2020) (Appendix L3).

Typically, the highest fire danger is produced by the high-pressure systems that occur in the Great Basin, which result in the Santa Ana winds of Southern California. Sustained wind speeds recorded during recent major fires in San Diego County exceeded 30 miles per hour (mph) and may exceed 50 mph during extreme conditions. The Santa Ana wind conditions are a reversal of the prevailing southwesterly winds that usually occur on a region-wide basis during late summer and early fall. Santa Ana winds are warm winds that flow from the higher desert elevations in the north through the mountain passes and canyons. As they converge through the canyons, their velocities increase. Consequently, peak velocities are highest at the mouths of canyons and dissipate as they spread across valley floors or mesas. Santa Ana winds generally coincide with the regional drought period and the period of highest fire danger.

The prevailing wind pattern is from the west (onshore), but the presence of the Pacific Ocean causes a diurnal wind pattern known as the land/sea breeze system. During the day, winds are from the west–southwest (sea) and at night winds are from the northeast (land), averaging 5 mph. During the summer season, the diurnal winds may average slightly higher (approximately 19 mph) than the winds during the winter season due to greater pressure gradient forces. Surface winds can also be influenced locally by topography and slope variations. The highest wind velocities are associated with downslope, canyon, and Santa Ana winds. Winds funneled through mountains and onto the flat mesas dissipate and produce lower average wind conditions (Appendix L3).

Evacuation

The County of San Diego (County) Emergency Operations Plan (EOP) (County of San Diego 2022) identifies a broad range of potential hazards and a response plan for public protection. The EOP identifies major interstates and highways within San Diego County that could be used as primary routes for evacuation. As part of the emergency response efforts, the San Diego Office of Homeland Security oversees emergency preparedness and response services for disaster-related measures, including the administration of the City's Emergency Operation Center and alternate Emergency Operation Center (City of San Diego 2020). For emergency evacuation, the EOP identifies Interstate (I) 15 as an emergency evacuation route in the vicinity of the project site. The primary roadways for evacuation from the project area currently include Scripps Poway Parkway, Spring Canyon Road, Scripps Ranch Boulevard, Mira Mesa Boulevard, and I-15. From these primary roadways, evacuees would be provided access to major traffic corridors, including I-15 and State Route 56, to connect to the regional evacuation points, such as I-15.

As shown in Table 5.19-1, the existing Miramar Ranch North Community includes 4,331 dwelling units (residences). With 2.86 persons per unit and 2 vehicles per unit, the Miramar Ranch North Community has an existing population of 12,387 people and a worst-case number of vehicles evacuating of 8,662. Dingeman Elementary and Ellen Browning Scripps Elementary have populations of 809 and 810 people, respectively. Both elementary schools have 13 buses, which are assumed to transport up to 60 persons. With 34 staff vehicles, Dingeman Elementary has a worst-case number of vehicles evacuating of 47 vehicles, while Ellen Browning Scripps Elementary has 30 staff vehicles for a worst-case number of vehicles evacuating of 43 vehicles. The commercial and industrial offices in the community have an estimated population of 3,552 and with an estimated 2 person per vehicle, have a worst-case number of vehicles evacuating of 1,776 vehicles. The existing community, including the existing Miramar Ranch North Community, Dingeman Elementary, Ellen Browning Scripps Elementary, and the commercial and industrial offices, has an existing total population of 17,558 people and a total worst-case number of vehicles evacuating of 10,528 vehicles.

Table 5.19-1
Existing Evacuation Vehicle Estimates and Anticipated Distribution Assuming 100 Percent Occupancy (Worst-Case Conditions)

	Existing Miramar Ranch North Community	Dingeman Elementary	Ellen Browning Scripps Elementary	Commercial/ Industrial-Office	Total
Dwelling Units (residences)	4,331	N/A	N/A	N/A	4,331

Table 5.19-1
Existing Evacuation Vehicle Estimates and Anticipated Distribution Assuming 100 Percent Occupancy (Worst-Case Conditions)

	Existing Miramar Ranch North Community	Dingeman Elementary	Ellen Browning Scripps Elementary	Commercial/ Industrial-Office	Total
Persons per Unit	2.86	N/A	N/A	N/A	2.86
Calculated Population	12,387	809	810	3,552[a]	17,558
Vehicles per Unit	2	13 buses and 34 staff vehicles[b]	13 buses and 30 staff vehicles[b]	N/A	N/A
Parking Spaces	N/A	N/A	N/A	4,233	4,233
Worst-Case Number of Vehicles Evacuating	8,662	47	43	1,776	10,528

Sources: Appendix N.
Notes: N/A = not applicable.
[a] Estimated at 2 persons per vehicle.
[b] This assumes each bus transports up to 60 persons and half of the estimated faculty and staff would evacuate in a personal vehicle.

Under existing conditions, the 10,528 total vehicles would evacuate using Scripps Power Parkway to I-15, Spring Canyon Road to Scripps Ranch Boulevard to Mira Mesa Boulevard to I-15, or a combination of both routes. Both routes have a minimum road capacity of 1,500 per hour, so in a worst-case scenario of all vehicles needing to use only one route, the estimated evacuation time is 7.02 hours or 421.2 minutes (Table 5.19-2).

Table 5.19-2
Existing Evacuation Travel Time Frames*

Evacuation Route: Scenario	Existing Condition	Minimum Road Capacity (vehicles per hour)	Existing Cond. Estimated Evacuation Travel Time Frame**
Scripps Poway Parkway to I-15	5,264	1,500	10,528 vehicles 7.02 hrs or 421.2 min

Table 5.19-2
Existing Evacuation Travel Time Frames*

Evacuation Route: Scenario	Existing Condition	Minimum Road Capacity (vehicles per hour)	Existing Cond. Estimated Evacuation Travel Time Frame**
Spring Canyon Road to Scripps Ranch Boulevard to Mira Mesa Boulevard to I-15	5,264	1,500	10,528 vehicles 7.02 hrs or 421.2 min
Total Vehicles	**10,528**	**N/A**	**N/A**

Sources: Appendix N.
Notes: I = Interstate; N/A = not applicable.
* Includes "wheels rolling" where all persons have left their home. Does not include notification, mobilization and travel out of the area
** Assumes worst-case scenario where only one evacuation route available (e.g., all traffic is directed to Scripps Poway Parkway)

5.19.2 REGULATORY FRAMEWORK

Federal

National Fire Protection Association Codes, Standards, Practices, and Guides

National Fire Protection Association codes, standards, recommended practices, and guides are developed through a consensus standards development process approved by the American National Standards Institute. This process brings together professionals representing varied viewpoints and interests to achieve consensus on fire and other safety issues. National Fire Protection Association standards are recommended guidelines and nationally accepted good practices in fire protection but are not laws or codes unless adopted as such or referenced as such by the California Fire Code (CFC) or the local fire agency.

Federal Wildland Fire Management Policy

The Federal Wildland Fire Management Policy was developed in 1995 and updated in 2001 and again in 2009 by the National Wildfire Coordinating Group, a federal multi-agency group that establishes consistent and coordinated fire management policy across multiple federal jurisdictions. An important component of the Federal Wildland Fire Management Policy is the acknowledgment of the essential role of fire in maintaining natural ecosystems. The Federal Wildland Fire Management Policy is based on the following guiding principles, found in the Guidance for Implementation of Federal Wildland Fire Management Policy (National Wildfire Coordinating Group 2009):

- Firefighter and public safety is the first priority in every fire management activity.

- The role of wildland fire as an essential ecological process and natural change agent will be incorporated into the planning process.
- Fire management plans, programs, and activities support land and resource management plans and their implementation.
- Sound risk management is a foundation for all fire management activities.
- Fire management programs and activities are economically viable, based upon values to be protected, costs, and land and resource management objectives.
- Fire management plans and activities are based upon the best available science.
- Fire management plans and activities incorporate public health and environmental quality considerations.
- Federal, state, tribal, local, interagency, and international coordination and cooperation are essential.
- Standardization of policies and procedures among federal agencies is an ongoing objective.

National Fire Plan

The National Fire Plan, officially titled Managing the Impacts of Wildfires on Communities and the Environment: A Report to the President in Response to the Wildfires of 2000, was a presidential directive in 2000 as a response to severe wildland fires that had burned throughout the United States. The National Fire Plan focuses on reducing fire impacts on rural communities and providing assurance for sufficient firefighting capacity in the future. The plan addresses five key points: firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability. The plan provides technical, financial, and resource guidance and support for wildland fire management across the United States. The U.S. Forest Service and the Department of the Interior are working to successfully implement the key points outlined in the plan (DOI and USDA 2000).

International Fire Code

Created by the International Code Council, the International Fire Code addresses a wide array of conditions hazardous to life and property, including fire, explosions, and hazardous materials handling or usage. The International Fire Code places an emphasis on prescriptive and performance-based approaches to fire prevention and fire protection systems. Updated every 3 years, the International Fire Code uses a hazards classification system to determine the appropriate measures to be incorporated to protect life and property (often these measures include construction standards and specialized equipment). The International Fire Code uses a permit system (based on hazard classification) to ensure that required measures are instituted (International Code Council 2024).

State

California Government Code

California Government Code, Sections 51175 through 51189, provide guidance for classifying lands in California as fire hazard areas and requirements for management of property within those lands. CAL FIRE is responsible for classifying FHSZs based on statewide criteria and makes the information available for public review. Further, local agencies must designate, by ordinance, Very High FHSZs within their jurisdiction based on the recommendations of CAL FIRE.

Section 51182 sets forth requirements for maintaining property within fire hazard areas, such as defensible space, vegetative fuels management, and building materials and standards. Defensible space around structures in fire hazard areas must consist of 100 feet of fuel modification on each side of a structure but not beyond the property line unless findings conclude that the clearing is necessary to significantly reduce the risk of structure ignition in the event of a wildfire. Clearance on adjacent property shall only be conducted following written consent by the adjacent owner. Further, trees must be trimmed from within 10 feet of the outlet of a chimney or stovepipe, vegetation near buildings must be maintained, and roofs of structures must be cleared of vegetative materials. Exemptions may apply for buildings with an exterior constructed entirely of nonflammable materials.

California Code of Regulations

Title 14 Natural Resources

California Code of Regulations (CCR) Title 14, Division 1.5, Chapter 7, Subchapter 3, Fire Hazard, also sets forth requirements for defensible space if the distances specified above cannot be met. For example, options that have similar practical effects include noncombustible block walls or fences, 5 feet of noncombustible material horizontally around the structure, installing hardscape landscaping or reducing exposed windows on the side of the structure with a less-than-30-foot setback, or additional structure hardening such as those required in the California Building Code (CBC) (CCR Title 24, Part 2).

Title 24 California Building Standards Code

California Building Code

Part 2 of CCR Title 24 contains the CBC. Chapter 7A of the CBC regulates building materials, systems, and/or assemblies used in the exterior design and construction of new buildings located within a fire hazard area. Fire hazard areas as defined by the CBC include areas identified as FHSZs within a State Responsibility Area or a WUI fire area. The purpose of Chapter 7A is to establish minimum standards

for the protection of life and property by increasing the ability of structures located in a fire hazard area to resist the intrusion of flames or burning embers projected by a wildfire and to contribute to a systematic reduction in structural losses from a wildfire. New buildings located in such areas must comply with the ignition-resistant construction standards outlined in Chapter 7A.

California Fire Code

Part 9 of CCR Title 24 contains the CFC, which incorporates by adoption the International Fire Code with necessary California amendments. The purpose of the CFC is to establish the minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises and to provide safety and assistance to firefighters and emergency responders during emergency operations. Chapter 49 of the CFC contains minimum standards for development in the WUI and fire hazard areas.

The CFC and Office of the State Fire Marshal provide regulations and guidance for local agencies in the development and enforcement of fire safety standards. The CFC is updated and published every 3 years by the California Building Standards Commission. The 2022 CFC took effect on January 1, 2023.

California Public Resources Code

California Public Resources Code, Section 4290, requires minimum fire safety standards related to defensible space that are applicable to residential, commercial, and industrial building construction in State Responsibility Area lands and lands classified and designated as Very High FHSZs. These regulations include road standards for fire apparatus access, standards for signs identifying roads and buildings, fuel breaks and green belts, and minimum water supply requirements. It should be noted that these regulations do not supersede local regulations that equal or exceed minimum regulations required by the state.

California Public Resources Code, Section 4291, requires a reduction of fire hazards around buildings located adjacent to a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land that is covered in flammable material. Section 4291 requires 100 feet of defensible space around all sides of a structure but not beyond the property line unless required by state law or local ordinances, rules, or regulations. Further, California Public Resources Code, Section 4291, requires the removal of dead or dying vegetative materials from the roof of a structure, and trees and shrubs must be trimmed from within 10 feet of the outlet of a chimney or stovepipe. Exemptions may apply for buildings with an exterior constructed entirely of nonflammable materials.

Fire Hazard Severity Zones

CAL FIRE maps FHSZs based on fuel loading, slope, fire history, weather, and other relevant factors as directed by California Public Resources Code, Sections 4201–4204, and California Government Code, Sections 51175–51189. FHSZs are ranked from Moderate to Very High and are categorized for fire protection within a Federal Responsibility Area, State Responsibility Area, or Local Responsibility Area under the jurisdiction of a federal agency, CAL FIRE, or local agency, respectively. As shown in Figure 5.19-1, the entire project site is designated as a Very High FHSZ (City of San Diego 2021b).

California Strategic Fire Plan

The 2018 Strategic Fire Plan for California reflects CAL FIRE's focus on fire prevention and suppression activities to protect lives, property, and ecosystem services and on natural resource management to maintain the state's forests as a resilient carbon sink to meet California's climate change goals and to serve as important habitat for adaptation and mitigation. The Strategic Fire Plan for California provides a vision for a natural environment that is more fire resilient, buildings and infrastructure that are more fire resistant, and a society that is more aware of and responsive to the benefits and threats of wildland fire, all achieved through local, state, federal, tribal, and private partnerships (CAL FIRE 2018b). Plan goals include the following:

1. Identify and evaluate wildland fire hazards and recognize life, property and natural resource assets at risk, including watershed, habitat, social and other values of functioning ecosystems. Facilitate the collaborative development and sharing of all analyses and data collection across all ownerships for consistency in type and kind.
2. Promote and support local land use planning processes as they relate to: (a) protection of life, property, and natural resources from risks associated with wildland fire, and (b) individual landowner objectives and responsibilities.
3. Support and participate in the collaborative development and implementation of local, county and regional plans that address fire protection and landowner objectives.
4. Increase fire prevention awareness, knowledge and actions implemented by individuals and communities to reduce human loss, property damage and impacts to natural resources from wildland fires.
5. Integrate fire and fuels management practices with landowner/land manager priorities across jurisdictions.
6. Determine the level of resources necessary to effectively identify, plan and implement fire prevention using adaptive management strategies.

7. Determine the level of fire suppression resources necessary to protect the values and assets at risk identified during planning processes.
8. Implement post-fire assessments and programs for the protection of life, property, and natural resource recovery.

Mutual Aid Agreements

The California Disaster and Civil Defense Master Mutual Aid Agreement, as provided by the California Emergency Services Act, provides statewide mutual aid between and among local jurisdictions and the state. The statewide mutual aid system exists to ensure that adequate resources, facilities, and other supports are provided to jurisdictions whenever resources prove to be inadequate for a given situation. Each jurisdiction controls its own personnel and facilities but can give and receive help whenever needed.

California Natural Disaster Assistance Act

The California Natural Disaster Assistance Act provides financial aid to local agencies to assist in the permanent restoration of public real property, other than facilities used solely for recreational purposes, when such real property has been damaged or destroyed by a natural disaster. The California Natural Disaster Assistance Act is activated after a local declaration of emergency, after the California Emergency Management Agency gives concurrence with the local declaration, or after the governor issues a proclamation of a state emergency. Once the California Natural Disaster Assistance Act is activated, local government is eligible for certain types of assistance, depending on the specific declaration or proclamation issued.

State Fire Regulations

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code and include regulations concerning building standards (as also set forth in the CBC), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The state fire marshal enforces these regulations and building standards in all state-owned buildings, state-occupied buildings, and state institutions throughout California.

Local

County of San Diego Office of Emergency Services

The Unified San Diego County Emergency Services Organization has primary responsibility for preparedness and response activities in the County. The County Office of Emergency Services

serves as staff to the Unified Disaster Council, the governing body of the Unified San Diego County Emergency Services Organization. Emergency response and preparedness plans include the Operational Area Emergency Response Plan and the County Multi-Jurisdictional Hazard Mitigation Plan.

Multi-Jurisdictional Hazard Mitigation Plan

The City is a participating jurisdiction in the Multi-Jurisdictional Hazard Mitigation Plan, a Countywide plan that identifies risks, minimizes damage from natural and human-made disasters, and is generally intended to provide compliance with regulatory requirements associated with emergency response efforts. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process and vulnerability assessments and identifies hazards present in each jurisdiction of the County (County of San Diego 2017). Hazards profiled in the plan include wildfire, structure fire, flood, coastal storms, erosion, tsunamis, earthquakes, liquefaction, rain-induced landslide, dam failure, hazardous materials incidents, nuclear materials release, and terrorism. The plan sets forth a variety of objectives and actions based on a set of broad goals, including the following: (1) promoting disaster-resistant future development; (2) increasing public understanding and support for effective hazard mitigation; (3) building support of local capacity and commitment to become less vulnerable to hazards; (4) enhancing hazard mitigation coordination and communication with federal, state, local, and tribal governments; and (5) reducing the possibility of damage and losses to existing assets, particularly people, critical facilities, or infrastructure, and County-owned facilities, due to dam failure, earthquake, coastal storm, erosion, tsunami, landslide, flood, structural fire/wildfire, and human-made hazards.

As part of the emergency response efforts, the City's Health and Safety Office oversees emergency preparedness and response services for disaster-related measures, including administration of the City Emergency Operations Center and alternate Emergency Operations Center (City of San Diego 2017).

City of San Diego General Plan

Multiple elements of City's General Plan (City of San Diego 2008) address wildfire safety and risk within the City. The General Plan provides policies for protecting communities from unreasonable risk of wildfire, including the following.

Conservation Element

- **CE-B.6.** Provide an appropriate defensible space between open space and urban areas through the management of brush, the use of transitional landscaping, and the design of structures (see also Urban Design Element Policy UD-A.3.o). Continue to implement a citywide brush management system.

Urban Design Element

- **UD-A.3.h.** Use building and landscape materials that blend with and do not create visual or other conflicts with the natural environment in instances where new buildings abut natural areas. This guideline must be balanced with a need to clear natural vegetation for fire protection to ensure public safety in some areas.
- **UD-A.3.p.** Design structures to be ignition and fire-resistant in fire prone areas or at-risk areas as appropriate. Incorporate fire-resistant exterior building materials and architectural design features to minimize the risk of structure damage or loss due to wildfires.

Public Facilities, Services, and Safety Element

- **PF-D.12.** Protect communities from unreasonable risk of wildfire within very high fire hazard severity zones.
    a. Assess site constraints when considering land use designations near wildlands to avoid or minimize wildfire hazards as part of a community plan update or amendment. (see also LU-C.2.a.4)
    b. Identify building and site design methods or other methods to minimize damage if new structures are located in very high fire hazard severity zones on undeveloped land and when rebuilding after a fire.
    c. Require ongoing brush management to minimize the risk of structural damage or loss due to wildfires.
    d. Provide and maintain water supply systems to supplies for structural fire suppression.
    e. Provide adequate fire protection. (see also PF-D.1 and PF-D.2 [analyzed in Public Services and Facilities in Section 5.14]).
- **PF-D.13.** Incorporate fire safe design into development within very high fire hazard severity zones to have fire-resistant building and site design, materials, and landscaping as part of the development review process.
    a. Locate, design and construct development to provide adequate defensibility and minimize the risk of structural loss from wildland fires.
    b. Design development on hillsides and canyons to reduce the increased risk of fires from topography features (i.e., steep slopes, ridge saddles).
    c. Minimize flammable vegetation and implement brush management best practices in accordance with the Land Development Code.

d. Design and maintain public and private streets for adequate fire apparatus vehicles access (ingress and egress), and install visible street signs and necessary water supply and flow for structural fire suppression.

e. Coordinate with the Fire-Rescue Department to provide and maintain adequate fire breaks where feasible or identify other methods to slow the movement of a wildfire in very high fire hazard severity zones.

- **PF-D.14.** Implement brush management along City maintained roads in very high fire hazard severity zones adjacent to open space and canyon areas.
- **PF-D.15.** Maintain access for fire apparatus vehicles along public streets in very high fire hazard severity zones for emergency equipment and evacuation.
- **PF-D.16.** Provide wildland fire preparedness education for fire safety advance planning.
- **PF-D.17.** Coordinate with local, state, and federal fire protection agencies with respect to fire suppression, rescue, mitigation, training and education.
- **PF-D.18.** Coordinate with local, state, and federal agencies to update emergency, evacuation, and hazard mitigation plans, as necessary (also see section PF-P. Hazard Mitigation and Disaster Preparedness).
- **PF-D.19.** Support city-wide emergency and disaster preparedness education programs. (Also see Section PF-P. Hazard Mitigation & Disaster Preparedness).
- **PF-D.20.** Locate, when feasible, new essential public facilities outside of very high fire hazard severity zones, including but not limited to, hospitals and health care facilities, emergency shelters, emergency command centers, and emergency communication facilities, or identify construction methods or other methods to minimize damage if these facilities are located in very high fire hazard severity zones.

City of San Diego Municipal Code

The San Diego Municipal Code (SDMC) contains the FHSZ maps and identifies the fire protection Very High FHSZs and local agency Very High FHSZs for the City area of responsibility. The adopted FHSZ maps from CAL FIRE are maintained and codified in SDMC Sections 55.9401 and 145.0703(a)(2).

The Very High FHSZs are located throughout the City. Inclusion within these zones is based on five factors: density of vegetation, slope severity, 5-minute fire department response time, road class/proximity and proximity to fire hydrants, and CAL FIRE's vegetation cover and fire behavior/fuel spread model. Based on these factors, the Very High FHSZs encompass a large portion of the City, including most land use designations, major freeways and roads, various structures, and major utilities and essential public facilities.

The City's Wildland Management and Enforcement program provides information and guidelines on brush management and weed abatement in FHSZs. The City's Fire Safety and Brush Management Guide summarizes guidelines for brush management in canyon areas and landscape standards. SDMC Section 142.0412 regulates brush management and requires 100 feet of defensible space between structures and native wildlands. The City's Landscape Standards acknowledge fire safety is achieved by reducing flammable fuel adjacent to structures. Requirements of the landscape standards are included for pruning and thinning native and naturalized vegetation and revegetation with low-fuel-volume plantings.

Brush Management

The City's brush management regulations (SDMC Section 142.0412) are intended to minimize wildland fire hazards through prevention activities and programs. These regulations require the provision of mandatory setbacks, irrigation systems, regulated planting areas, and plant maintenance in specific zones and are implemented at the project level through the grading and building permit process.

Brush management is required in all base zones on publicly or privately owned premises that are within 100 feet of a structure and contain native or naturalized vegetation. The City requires brush management plans for all new development. These plans are intended to reduce the risk of significant loss, injury, or death involving wildland fires. Unless otherwise approved by the City fire marshal, the brush management plans for all future development would consist of two separate and distinct zones, as follows:

- **Zone 1:** The area adjacent to structures where flammable materials would be minimized through the use of pavement and/or permanently irrigated ornamental landscape plantings. This zone is not allowed on slopes with a gradient greater than 4:1.
- **Zone 2:** The area between Zone 1 and any area of native or non-irrigated vegetation. This zone would consist of thinned native or naturalized vegetation.

Modifications to the standard defensible space dimensions may be approved based on the site plan and site conditions. The Fire Chief may allow implementation of alternative compliance measures to achieve an equivalency of a full defensible space as allowed under Section 142.0412(i). Approval of such measures are based on documentation that addresses topography, existing or potential fuel loads, and other characteristics related to fire protection and the context of the proposed development.

5.19.3 IMPACT ANALYSIS

5.19.3.1 Issue 1: Impair an Emergency Response or Emergency Evacuation Plan

Issue 1: Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Thresholds

Consistent with California Environmental Quality Act (CEQA) Guidelines Appendix G, a project would result in a significant impact related to wildfire if it would:

- Substantially impair an adopted emergency response plan or emergency evacuation plan

Impact Analysis

As discussed in Section 5.19.2, Regulatory Framework, the City is a participating entity in the Multi-Jurisdictional Hazard Mitigation Plan (County of San Diego 2017), which is generally intended to provide compliance with regulatory requirements associated with emergency response efforts. As mentioned, the EOP identifies I-15 as an emergency evacuation route in the vicinity of the project site. The project site is approximately 2.5 miles east of I-15. To connect to the regional evacuation points such as the I-15, Mobility Element roadways would be utilized for community evacuation. Per the Vehicle Miles Traveled Analysis (Appendix B1 to this EIR), the proposed project is anticipated to add 1,096 average daily trips to and from the project site.

In addition to the FFLMR, an evacuation plan has been prepared for the proposed project and can be found in Appendix N. The evacuation plan was prepared in accordance with the City's Emergency Operations Procedures (City of San Diego 2010), the County of San Diego Emergency Operations Plan, the Unified San Diego County Emergency Services Organization, and the County of San Diego Operational Area Emergency Operations Plan – Evacuation Annex. Primary evacuation routes consist of the major interstates, highways, and prime arterials within the City. As mentioned above, for emergency evacuation, the EOP identifies I-15 as an emergency evacuation route in the vicinity of the project site. The evacuation plan has identified that the primary roadways for evacuation from the project site would include Scripps Poway Parkway, Spring Canyon Road, Scripps Ranch Boulevard, Mira Mesa Boulevard, and I-15. From these primary roadways, evacuees would be provided access to major traffic corridors, including I-15 and State Route 56 (Appendix N), which are identified in the EOP as emergency evacuation routes for the County (County of San Diego 2018). During a project emergency evacuation, the primary and secondary roadways may provide citizens egress while responding emergency vehicles are inbound. As the project is in the westernmost portion of the Community Plan area, project traffic would evacuate west through the Miramar Ranch North Community. The potential occurrence of a large evacuation event including evacuation of existing populations is minimal but possible. In this case, the existing populations would be

associated with Miramar Ranch North Community residences, Dingeman Elementary, Ellen Browning Scripps Elementary, and Commercial and Industrial-Office uses. With the addition of the project to the evacuation of the Scripps Miramar and Miramar Ranch North Community Plan, under the worst-case scenario, the project would increase the evacuating population by 312 to a total of 17,870, and the number of evacuating vehicles would increase by 224 to a total of 10,752 vehicles evacuating the Miramar Ranch North Area, as depicted in Table 5.19-3.

Table 5.19-3
Evacuation Vehicle Estimates and Anticipated Distribution Assuming 100 Percent Occupancy of the Project (Worst-Case Conditions)

	Existing Miramar Ranch North Community	Renzulli Estates (Project)	Dingeman Elementary	Ellen Browning Scripps Elementary	Commercial / Industrial-Office	Combined
Dwelling Units (residences)	4,331	112	N/A	N/A	N/A	4,443
Persons per Unit	2.86	2.78	N/A	N/A	N/A	N/A
Calculated Population	12,387	312	809	810	3,552[a]	17,870
Vehicles per Unit	2	2	13 buses and 34 staff vehicles[b]	13 buses and 30 staff vehicles[b]	N/A	N/A
Parking Spaces	N/A	N/A	N/A	N/A	4,233	4,233
Worst-Case Number of Vehicles Evacuating	8,662	224	47	43	1,776	10,752

Sources: Appendix N.
Notes: N/A = not applicable.
[a] Estimated at 2 persons per vehicle.
[b] This assumes each bus transports up to 60 persons and half of the estimated faculty and staff would evacuate in a personal vehicle.

The addition of the project would result in a minimal change of 312 people (1.78%) and 224 (2.13%) vehicles evacuating. The time estimates for the existing condition and project scenario are summarized in Table 5.19-4. The project would add 224 vehicles to the total vehicles evacuating the community, for a total of 10,752 vehicles. This would change the estimated evacuation time to 7.17 hours or 430.2 minutes, in a worst-case scenario of all vehicles needing to use only one route. With the project, there is a minimal increase in the calculated evacuation travel time of up to an

estimated 9 minutes for all evacuation routes. This is due to the relatively small number of additional vehicles that would be generated by the project. This travel time calculation is conservative in both the number of vehicles evacuating and the number of vehicles per hour that can be accommodated.

All access roads would be constructed in accordance with SDMC Sections 55.8701 and 55.8703, which outline the requirements for fire apparatus access roads and gates to ensure adequate emergency access within the project site. Because the required fire access roads throughout the area are designed to meet or exceed County of San Diego Consolidated Fire Code, including 24-foot-wide, unobstructed roadways, adequate parking, turning radius, grade maximums, and roadside fuel modification zones, potential conflicts that could reduce the roadway efficiency are minimized, allowing for smoother evacuations (Appendix N). As discussed in Section 5.2, Transportation, the current terminus of Lakehurst Avenue a three-legged intersection with a side-stop control at Lakehurst Avenue. The proposed vacation of Lakehurst Avenue would not result in any new vehicular trips or change the existing configuration of the Lakehurst Avenue/Pocahontas Avenue intersection that would impair emergency response. Therefore, the proposed project would not impair the implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

While the project would increase the number of vehicles to the project area, the number of vehicles added are not expected to significantly impact the capacity of the evacuation routes identified in proximity to the project site. Additionally, as stated above, the project would comply with all SDMC and Fire Code road requirements that would allow for emergency ingress/egress. The project would not impair implementation of, or physically interfere with, the San Diego Emergency Plan. Additionally, the project is subject to review by SDFD and the San Diego Police Department to ensure compliance with applicable safety standards.

Table 5.19-4
Project Evacuation Travel Time Frames[a]

Evacuation Route: Scenario	1. Existing Cond.	2. Existing Cond. + Project	3. Existing Cond. + Project	4. Existing Cond. + Project	Minimum Road Capacity (vehicles per hour)	Existing Cond. Estimated Evacuation Travel Time Frame[b]	Existing Cond. + Project Estimated Evacuation Travel Time Frame[c]	Travel Time Increase with Project
Scripps Poway Parkway to I-15	5,264	5,264 (EC) / 112 (P)	10,528 (EC) / 224 (P)	N/A	1,500	10,528 vehicles 7.02 hrs or 421.2 min	10,752 vehicles 7.17 hrs or 430.2 min	0.15 hrs or 9 min
Spring Canyon Road to Scripps Ranch Boulevard to Mira Mesa Boulevard to I-15	5,264	5,264 (EC) / 112 (P)	N/A	10,528 (EC) / 224 (P)	1,500	10,528 vehicles 7.02 hrs or 421.2 min	10,752 vehicles 7.17 hrs or 430.2 min	0.15 hrs or 9 min
Total Vehicles	**10,528**	**10,752**	**10,752**	**10,752**	**N/A**	**N/A**	**N/A**	**N/A**

Source: Appendix N

Notes: EC = existing condition; P = project; N/A = not applicable.

[a] Includes "wheels rolling" where all persons have left their home. Does not include notification, mobilization, and travel out of the area.

[b] Assumes worst-case scenario where only one evacuation route is available (e.g., all traffic is directed to Scripps Poway Parkway).

[c] Estimated evacuation travel time frame is calculated by dividing the maximum number of vehicles using each evacuation route by the route's lowest vehicle capacity. The longest evacuation route time frame is used to represent the overall travel time.

Significance of Impact

The project would not impair or physically interfere with an adopted emergency response or evacuation plan, and impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.19.3.2 Issue 2: Expose People or Structures to Significant Wildfire Risk

Issue 2: Would the project expose people or structures to significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Thresholds

Consistent with State CEQA Guidelines Appendix G, a project would result in a significant impact related to wildfire if it would:

- Expose people or structures to significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands

Impact Analysis

As shown in Figure 5.19-1, the entire project site is designated as a Very High FHSZ (City of San Diego 2021b). The project would introduce a residential development to the site, which would increase the density of the project site compared to the existing single-family residence on site.

Water supply impacts the ability for fire personnel to fight fire on site if an ignition were to occur. The project would include water infrastructure, including fire hydrants and fire sprinkler systems as required by SDMC. The project is designed and sized to meet the project's water needs in conformance with City standards. The City would have an adequate water supply, including water for fire suppression, considering the City's 2020 Urban Water Management Plan (UWMP) demonstrates adequate water supply through year 2045 (City of San Diego 2021c). Therefore, the project would have an adequate water supply for fire suppression activities if a wildfire were to occur on site.

The increase in site density would reduce the amount of the WUI (the community perimeter) with vegetation. By decreasing the exposure of structures to more ignitable fuels (in this case natural

vegetation), wildfire risk is reduced. Additionally, the more spread out the development, the more difficult it is for fire resources to protect homes. The project would convert vegetative fuels within the project development footprint and provide a managed BMZ that separates homes from unmaintained fuel, thereby creating an interface condition that facilitates the defense of structures on site.

The project is required to implement BMZs to minimize wildland fire hazards. BMZs are typically designed to provide vegetation buffers that gradually reduce fire intensity and flame lengths from advancing fire by strategically placing thinning zones and irrigated zones adjacent to each other on the perimeter of the WUI-exposed structure(s). The project would be exposed to pockets of naturally vegetated open space areas to the northwest, north, southwest, and southeast that would remain as open space as part of the project; however, the majority of the proposed development would be located in proximity to existing residential communities to the north, south, east, and west, and the Cypress Canyon Park to the east. The project would be directly adjacent to existing residences to the north. The project being located adjacent residential communities reduces the project exposure to vegetation and would reduce the exposure to opportunities for wildfire igniting homes.

The City requires brush management in areas that are within 100 feet of a structure and contain native or naturalized vegetation per SDMC Section 142.0412. As outlined in SDMC Section 142.0412, the 100-foot BMZ shall be broken up into two zones (Zone 1 width: 35 feet, and Zone 2 width: 65 feet). Zone 1 is the zone that is adjacent to the proposed structure and is the least flammable of the two, typically consists of ornamental plants or pavement, and shall not have a slope exceeding a gradient of 4:1. Zone 2 consists of the area between Zone 1 and native or naturalized vegetation and typically consists of thinned native or naturalized non-irrigated vegetation (SDMC 142.0412).

Modifications to the standard defensible space dimensions may be approved based on the site plan and site conditions. The Fire Chief may allow implementation of alternative compliance measures to achieve an equivalency of a full defensible space as allowed under Section 142.0412(i). Because the project would require alternative compliance from SDMC Section 142.0412(i), an FFLMR for the project was completed to address alternative compliance measures associated with the project. The project would include one fully irrigated Zone 1 BMZ extending up to 57 feet from the single-family structures and up to 80 feet from the multifamily units to the point where manufactured slopes transition from 4:1 to 2:1. The existing conditions around the project site include sensitive habitat and Multi-Habitat Planning Area lands to the north, east, south, and southwest. A portion of these sensitive areas, along with lot constraints, create a condition where it is not possible to achieve a standard BMZ.

Due to existing site constraints and as described above, the project would not meet the standard requirements outlined for BMZs on the project site. The FFLMR provides an alternative approach

that provides for a modified Zone 1 within the project's building areas and a modified Zone 2 thinning BMZ area that includes significant vertical separation of the developed area from off-site fuels (Figures 3-3a through 3-3c). Alternative compliance measures for portions of the project site that are not able to meet the standard BMZ width requirements are identified in Table 5.19-5.

Table 5.19-5
Alternative BMZ Compliance Measures

Lots	Restriction	Compliance Standard	Alternative Compliance Measure
Southern Perimeter Lots	Standard BMZ would extend past property line	100 feet of combined Zone 1 and Zone 2 BMZ	Zone 1 BMZ would extend between 44 feet and 57 feet. All perimeter single-family lots that do not achieve a full 100 feet of Zone 1 BMZ would include a 6-foot-tall CMU fire wall.
Northern Perimeter Lots	Standard BMZ would extend past property line	100 feet of combined Zone 1 and Zone 2 BMZ	Zone 1 BMZ would extend 47.5 feet. All perimeter single-family lots that do not achieve a full 100 feet of Zone 1 BMZ would include a 6-foot-tall CMU fire wall and code-exceeding ignition resistance of the residential structures.
Eastern Multifamily Lots	Standard BMZ would extend past property line	100 feet of combined Zone 1 and Zone 2 BMZ	Zone 1 BMZ would extend between 15 feet and 80 feet. All perimeter multifamily lots that do not achieve a full 100 feet of Zone 1 BMZ would include a 20-foot-plus-tall retaining wall that would act as a fire wall and other code-exceeding ignition resistance of the residential structures. The existing off-site equivalent BMZ from the adjacent Cypress Canyon Park to the east would provide additional protection.

Source: Appendix L3.
Note: BMZ = brush management zone; CMU = Concrete Masonry Unit.

As presented in Table 5.19-5, the project would include heat-deflecting fire walls that would act as an obstacle to deflect heat in areas of the project that cannot achieve the standard BMZ fuel separation requirements. Heat-deflecting fire walls around several lots would be required near the top of the manufactured slopes due to the inability of these lots to achieve the required 100-foot BMZ. Additionally, the project's slopes require the construction of significant retaining walls along portions of the southern, eastern, and western project site boundaries. The installation of fire and retaining walls would create an elevated pad and vertical separation from fuels. The fire and retaining walls would function as heat-deflecting surfaces and provide justification for the BMZ modifications. The proposed 6-foot fire walls would implement one of two potential designs. One wall design would be a

noncombustible, 6-foot-tall, heat- and ember-deflecting wall constructed of concrete masonry unit (lower 2 feet), dual pane (upper 4 feet), and one pane tempered glazing. The second proposed design would be a 6-foot-tall wall, constructed entirely of concrete masonry unit masonry, which would provide additional deflection for the impacted structures and fuel modification areas. The retaining fire walls would provide a vertical, noncombustible surface in the line of heat, fumes, flames, and embers traveling up the slope. As determined in the FFLMR, the modified irrigated Zone 1 BMZ, ignition-resistant building construction, concrete masonry unit fire walls, and proposed retaining walls provide a level of fire protection that is considered appropriate alternative compliance. Fuel modification area vegetation management would occur as needed for fire safety and as determined by SDFD and would comply with the BMZ requirements identified in the SDMC Sections 142.0401 to 142.0413 and as detailed on the landscape plan (Figures 3-3a through 3-3c). The owner/permittee would be required to provide brush management in accordance with the SDMC.

The distance between the wildland fire that is consuming wildland fuel and the home ("urban fuel") is the primary factor for structure ignition (not including burning embers). However, wildfire does not spread to homes unless the fuel and heat requirements (of the home) are sufficient for ignition and continued combustion (Cohen 1995; Alexander 1998). The proposed project would comply with City and state codes through implementation of structure ignition reduction measures that would reduce structure vulnerability to wildfire. Per current code standards, the project would implement interior sprinklers (required by the 2013 Building/Fire Code update). The proposed project would include highly resistant materials and construction methods that would be built to California Essential Services Buildings Standards, which would be equivalent to or exceed ignition-resistant standards per Chapter 7A of the San Diego Building Code. Additionally, the project would comply with Chapter 7A of the San Diego Building Code through implementation of fire-resistant materials; exterior fire ratings for walls, windows, and doors; and implementation of automatic alarm and sprinkler systems.

As discussed above, implementation of the proposed BMZs, in conjunction with proper long-term maintenance of fuel management areas, would substantially lower fire behavior intensity during peak weather conditions. The proposed alternative BMZ compliance measures would adequately meet fire standards. In addition, all habitable structures would be equipped with automatic alarm and sprinkler systems and would have fire resistance construction per Chapter 7A of the CBC. The City's Landscape and Fire Review staff have reviewed the Brush Management Plan and concluded that it adequately addresses the fire safety potentially affecting the project site. The project and identified project features have been designed in accordance with the City's Landscape Regulations, including SDMC Section 142.0412.

Significance of Impact

The project would comply with applicable state and City standards associated with fire hazards and prevention, including alternative compliance measures. Therefore, potential impacts related to wildfire hazards would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.19.3.3 Issue 3: Exacerbate Wildfire Risk Resulting in Exposure to Pollutants or the Spread of a Wildfire

Issue 3: Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Thresholds

Consistent with State CEQA Guidelines Appendix G, a project would result in a significant impact related to wildfire if, due to slope, prevailing winds, and other factors, it would:

- Exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire

Impact Analysis

As stated above, the project site is in a Very High FHSZ and is located in a WUI area. Additionally, prevailing winds that represent the highest fire danger for the project site are the Santa Ana winds, which are produced by the high-pressure systems that occur in the Great Basin and result in high wind speeds. Topography on the project site varies greatly but is generally steep and hilly with lowland canyon bottoms in the southern and northern portion of the parcel, which have the potential to represent a fire risk. Additionally, the project would increase the number of people at the project site during construction and operation, which would increase the ignition risk at the site. The FFLMR, included as Appendix L3, analyzed pre- and post-development conditions for wildfire on the project site. The results are discussed below.

While the project would result in an increase in the number of people at the site, increasing the opportunity for ignitions, the project would convert fuels on site to developed site consisting of ignition-resistant materials. Based on the post-development analysis provided in the FFLMR, which is inclusive of the modified BMZs, fire behavior expected within areas irrigated and replanted with

plants (BMZ 1) and thinned shrubs and chapparal (BMZ 2), under peak weather conditions (represented by fall weather) and expected fire conditions, would be significantly lower than pre-development conditions. The modified BMZ proposed for the project was determined to provide adequate defensible space to augment a wildfire approaching the perimeter of the project site. The proposed Concrete Masonry Unit walls and retaining walls would also provide flat, vertical, noncombustible surfaces that separate the natural existing vegetation and thinning areas from the developed areas.

Pollutant concentrations or exposure from a wildfire event near the project site could occur if the wildfire is not suppressed after it first starts. In areas where the public might be experiencing wildfire smoke, the Environmental Protection Agency recommends that public health and air quality agencies provide advice on strategies to limit exposure, which include staying indoors, limiting physical activity, reducing indoor air pollution sources, effectively using air conditioners and air filters or cleaners, creating cleaner air shelters, and using respiratory protection appropriately. The most common advisory during a smoke episode is to stay indoors, where people can better control their environment. Whether at home or in a public space, indoor environments that have filtered air and climate control can provide relief from smoke and heat (EPA 2019).

Significance of Impact

The assessment in the project's FFMLR considers the project area's fire history, historical weather and wind data, terrain, and fuels and concludes that the project would not exacerbate wildfire risks, thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, or other factors. Impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.19.3.4 Issue 4: Altered or Additional Infrastructure

Issue 4: Would the project 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?

Thresholds

Consistent with State CEQA Guidelines Appendix G, a project would result in a significant impact related to wildfire if the project would:

- 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

Impact Analysis

Construction

The project would involve the construction of single-family and multifamily homes, interior roadways and parking, landscaping, and brush management, and connections to existing water, sewer, and electricity infrastructure would be required. Utility connections would be required to comply with the current 2019 CCR, Title 24 Parts 1–12, as well as City regulations, which would require review and approval through the building permit process. All access roads would be constructed in accordance with SDMC Sections 55.8701 and 55.8703, which outline the requirements for fire apparatus access roads and gates to ensure adequate emergency access within the project site. The project does request a deviation from SDMC Section 142.0560(j)(1), Table 42-05N, to allow for 16-foot-wide driveways, which would not result in access issues for emergency personnel or evacuating residents. Additionally, the project is subject to review by SDFD and the San Diego Police Department to ensure compliance with applicable safety standards. All construction activities would be conducted in accordance with state and local guidelines related to fire prevention and safety.

Operation

Utilities

Operation of utility infrastructure would be underground, within the project site, and would not exacerbate fire risks.

Roads

All access roads would be constructed in accordance with SDMC Sections 55.8701 and 55.8703, which outline the requirements for fire apparatus access roads and gates to ensure adequate emergency access within the project site. The project does request a deviation from SDMC Section 142.0560(j)(1), Table 42-05N, to allow for 16-foot-wide driveways, which would not result in access issues for emergency personnel or evacuating residents. Additionally, the project is subject to review by SDFD and the San Diego Police Department to ensure compliance with applicable safety standards.

Landscaping and Brush Management

The project would include BMZs between the surrounding natural open space areas and on-site structures. BMZs are designed to provide vegetation buffers that gradually reduce fire intensity and flame lengths from advancing fire and would reduce, rather than exacerbate, wildfire risk, and vegetation management activities would occur prior to the start of construction and throughout the life of the project. Consequently, the associated vegetation management activities would not exacerbate fire risk, provided that fuel modification and other vegetation management activities are implemented prior to the start of construction and enforced according to City and state requirements. The proposed vegetation management activities would reduce the fire risk by thinning or removing combustible vegetation and implementing a landscape plan with more adequately spaced, drought-tolerant, low-fuel-volume plants (Figure 3-3) to reduce flame lengths of an approaching wildfire and avoid exacerbating wildfire risks. BMZs would be maintained on an annual basis or more frequently as necessary, as described in Section 3.3.3.

Summary

Given that the activities involved with installation or maintenance of associated infrastructure would require ground disturbance and the use of heavy machinery associated with trenching, grading, site work, and other construction and maintenance activities, the installation of related infrastructure could potentially result in temporary impacts to the environment or exacerbate wildfire risks. However, the installation and maintenance of roads, service utilities, drainage and water quality improvements, and vegetation management activities are within the residential development pad of the project analyzed herein and would not be traversing wildlands. Additionally, the project would be required to comply with all regulatory requirements associated with trenching, grading, site work, and the use of heavy machinery. In addition, the project would ultimately result in the clearing of fuels within the development footprint of the site. As such, any potential temporary or ongoing environmental impacts related to these components of the proposed project have been accounted for and analyzed in this EIR as part of the development footprint impact assessment conducted for the entirety of the project under Sections 5.19.3.4, above. No adverse physical effects beyond those already disclosed in this EIR would occur as a result of implementation of the project's associated infrastructure.

Significance of Impact

Therefore, the project would not exacerbate wildfire risk during construction or operation, and impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.

5.19.3.5 Issue 5: Flooding and Landslides

Issue 5: Would the project 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?

Thresholds

Consistent with State CEQA Guidelines Appendix G, a project would result in a significant impact related to wildfire if the project would:

- 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

Impact Analysis

As discussed in Section 5.6, Geologic Conditions, and the geotechnical investigation, no evidence of deep-seated landslide deposits were encountered at the site (Appendix E1). Topographically, the project is generally steep and hilly with moderate to steep sloping terrain. The occurrences of terrain features, such as slope and landforms, that may affect fire behavior on the project site were analyzed and incorporated into the risk assessment and in development of fire protection features (Appendix L3). Compliance with building and land development code requirements for any existing or manufactured slopes would minimize potential slope instability.

As discussed in Section 5.10, Hydrology, the Drainage Study (included as Appendix I2) prepared for the project concludes that although the project would increase the amount of impervious surfaces, the project would not exceed pre-project peak-flow conditions with the incorporation of additional storm drains that were included in the project design. The proposed storm drains would be sized to accommodate the post-project peak-flow conditions. The combination of basins would be sufficient to ensure the graded total peak 100-year flow rates for the proposed condition would be less than the maximum allowable peak-flow rate. Thus, the project would not impose flood hazards due to changes in runoff or drainage.

Slope failures, mudflows, and landslides are common in areas where steep hillsides and embankments are present, and such conditions would be exacerbated in a post-fire environment where the vegetative cover has been removed. If a wildfire were to occur, proposed catch basins and bioretention basins would be restored to ensure that drainage would return to post-project

development conditions. The maintenance of these features is required via standard conditions of approval. Flooding as a result of runoff or drainage changes under post-fire conditions would not expose people or structures to significant risk.

Due to the proposed development of the site, lack of evidence of previous landslides, maintenance of pre-project drainage conditions, and existing residential development that largely surrounds the site, it is unlikely that the project would expose people or structures to downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes.

Significance of Impact

The project would 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. Impacts would be less than significant.

Mitigation Measures

As impacts would be less than significant, no mitigation would be required.



SOURCE: Esri Clarity Basemap, City of San Diego

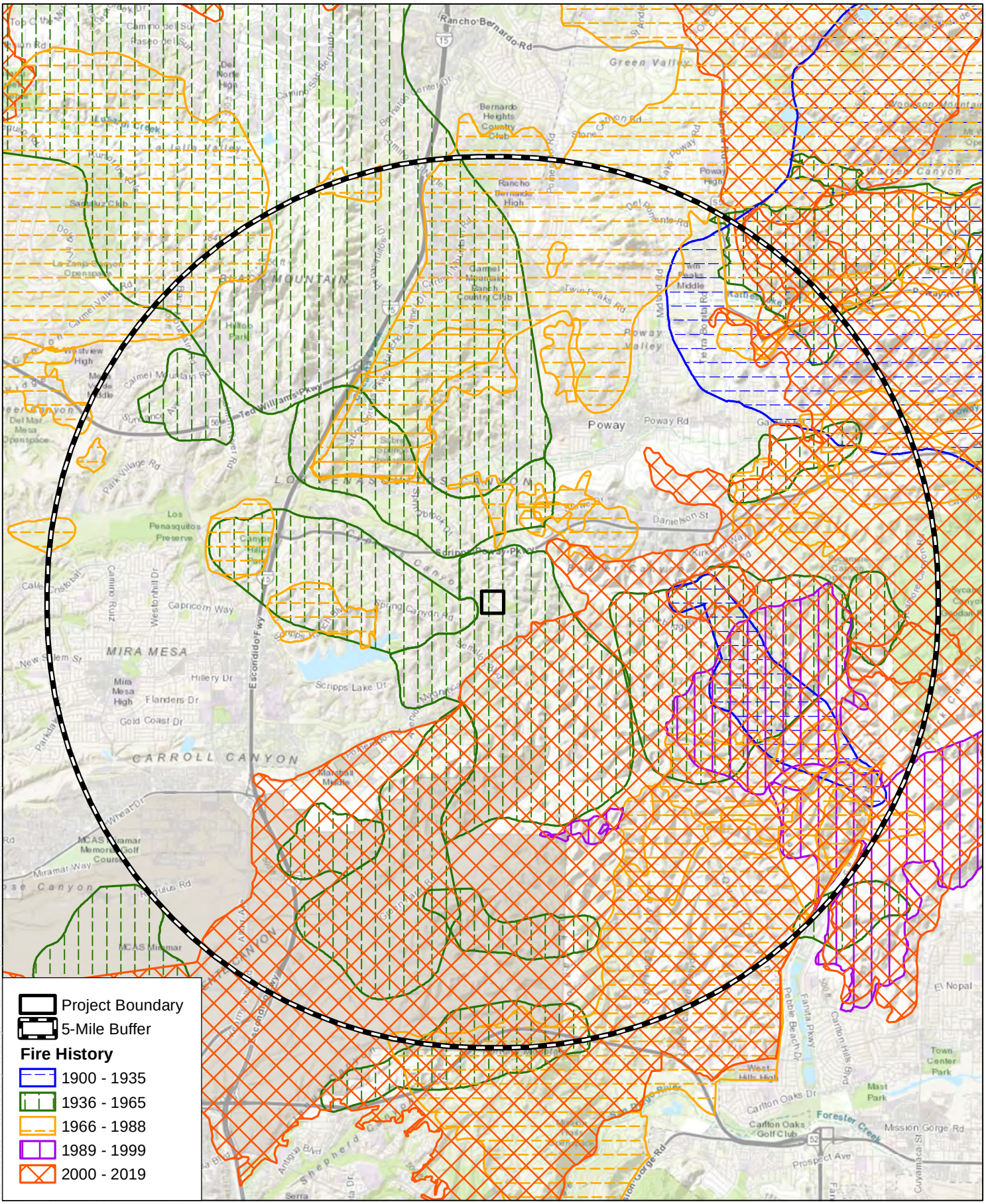
0 250 500 Feet
0 70 140 Meters
1:6,000

FIGURE 5.19-1

Fire Hazard Severity Zone

EIR for the Renzulli Estates Project, City of San Diego, California

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SOURCE: BASE MAP- ESRI; FIRE DATA-CALFIRE 2019

0 1 2 Miles

FIGURE 5.19-2

Fire History Map

EIR for the Renzulli Estates Project, City of San Diego, California

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CHAPTER 6 CUMULATIVE EFFECTS

California Environmental Quality Act (CEQA) Guidelines Section 15130(a) requires that an environmental impact report (EIR) discuss the cumulative impacts of a project when the project's incremental effect is cumulatively considerable as defined in Section 15065(a)(3). CEQA Guidelines Section 15355 defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (14 CCR 15355).

According to CEQA Guidelines, Section 15130(b), "the discussion [of cumulative impacts] need not provide as great detail as is provided for the effects attributable to the project alone" (14 CCR 15130[b]). Section 15130(b) further states that a cumulative impacts discussion "should be guided by standards of practicality and reasonableness" (14 CCR 15130[b]). The evaluation of cumulative impacts is to be based in 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." This cumulative impact analysis uses the list method. The locations of the cumulative projects are depicted in Figure 6-1, Cumulative Projects. A brief description of each cumulative project is presented in Table 6-1; the numbers in the list correspond to the locations shown on Figure 6-1. The basis and geographic area for the cumulative impacts discussed in Table 6-1 are dependent on the nature of the issue and the project.

Table 6-1
Cumulative Projects

No.	Name	Project ID	Project Description	Project Status
City of San Diego				
1	Scripps Mesa Joint Occupancy Project	PTS 678857	254 multifamily residential units, 2,000 square feet (sf) of commercial/retail space, and a 4,000 sf community center	Approved and under construction
2	Scripps Ranch Reservoir - Wireless Communication Facility	PRJ-1082677	Removal and installation of three antennas and modifications to the equipment shelter	Under review
3	Pinnacle Substantial	PTS 658394	SCR of an addition of parking and a 34,900 sf third story to an existing two-story, 65,913 sf medical office building	Approved

Table 6-1
Cumulative Projects

No.	Name	Project ID	Project Description	Project Status
	Conformance Review (SCR)			
4	Scripps Highlands – Wireless Communication Facility	PRJ-1050568	Dish to install a new wireless site	Approved
5	Scripps Gateway SCR	PRJ-1121542	SCR to PTS-180357 to shift approved square footage between regional commercial uses and site planning to reflected current market	Under review
6	Scripps Gateway – Wireless Communication Facility	PRJ-1109168	Installation of three antennas and supporting equipment cabinet	Approved
7	Evening Creek – Wireless Communication Facility	PRJ-1059004	Wireless telecommunication facility on the roof of an existing office commercial building	Approved

6.1 CUMULATIVE EFFECTS ANALYSIS

6.1.1 LAND USE

As discussed in Section 5.1, Land Use, deviations requested under the proposed project would not affect any other environmental issue or sensitive resource, and they would not result in a significant physical impact on the environment. Further, Section 5.1 analysis demonstrates the project would implement many of the applicable goals, policies, guidelines, and recommendations contained within the City of San Diego (City) General Plan and the Scripps Miramar Ranch Community Plan (Community Plan). The project is concurrently processing a proposed amendment to the Community Plan, as well as a rezone, which would rezone the site from the existing Agricultural–Residential (AR) 1-1 zone to Residential–Small Lot (RX) 1-2, Residential–Multiple Unit (RM) 2-4, and Open Space–Residential (OR) 1-2 to allow for the proposed residential development on site. Impacts associated with the increase in use intensity on the site are analyzed and addressed through this EIR.

Additionally, the project is not located within the Airport Influence Area for the Marine Corps Air Station–Miramar, and the project would not conflict with the Airport Land Use Compatibility Plan. The proposed project would also not result in a conflict with the provisions of the City's Multiple Species Conservation Program Subarea Plan with the approval of the proposed boundary line adjustment. However, as discussed in Section 5.1.3.1, the proposed project would be inconsistent with the land use assumptions and greenhouse gas (GHG) emissions assumed in the Climate Action Plan (CAP). The impacts of the proposed project related to GHG emissions would remain significant after mitigation and would therefore remain inconsistent with the CAP.

All other cumulative projects are required to comply with the General Plan, any applicable community plan, and existing zoning. Each project is required to be considered in combination with other foreseeable projects and is required to demonstrate consistency with an adopted land use plan, land use designation, or policy. However, there are cumulative projects within the City, such as project 5, that are not consistent and require implementation of a Community Plan Amendment, and/or zone change and are required to demonstrate conformance with pertinent goals, policies, and recommendations. Similar to the proposed project, other cumulative projects would be consistent with land use policies with the implementation of applicable Community Plan Amendments or rezoning. Regarding CAP consistency, other projects would result in rezoning or land use amendments that may not be consistent with the CAP and exceed thresholds. Therefore, land use impacts would be cumulatively considerable.

6.1.2 TRANSPORTATION

As discussed in Section 5.2, Transportation, the proposed Cypress Canyon Road connection would provide bicycle access and access for emergency service providers through the project site from both the eastern and western access points on Cypress Canyon Road. The project would not result in inadequate emergency access or create hazardous design features. The project proposes a deviation from the driveway requirements in San Diego Municipal Code (SDMC) Section 142.0560(j)(1), Table 42-05N, and proposes 16-foot-wide driveways with a 3-foot flare on each side. Even with the deviation, the proposed project would be consistent with plans, policies, and regulations related to the transportation system.

Further, the proposed residential project is located in Census Tract 170.44 and has a vehicle miles traveled (VMT) per resident of 123.4% of the regional average (23.4 compared to the regional average VMT per resident of 18.9), which is above the City's 85% residential VMT significance threshold. Per the City's Transportation Study Manual, for residential projects that generate less than 2,400 average daily traffic, the project's VMT per resident is considered the same as the VMT per resident of the census tract which it is located. Therefore, per the City Transportation Study Manual, inputting the

project into the San Diego Association of Governments (SANDAG) Regional Travel Demand model is not required since the estimated average daily traffic for the proposed Project is less than 2,400.

VMT was addressed on a city-wide cumulative level in the Final Program EIR for Complete Communities: Housing Solutions and Mobility Choices. This Final Program EIR and the associated findings and statement of overriding considerations are incorporated by reference and relied upon for this project. The project would provide mitigation in compliance with the Mobility Choices Regulations, consistent with the Final Program EIR for Complete Communities: Housing Solutions and Mobility Choices. As detailed in the findings and statement of overriding considerations for that EIR, even with the implementation of regional and citywide measures/policies, potentially significant VMT impacts could nonetheless remain significant because it cannot be determined with certainty whether the improvements would be implemented at the time a future development project's VMT impacts could occur and whether those impacts would be mitigated to a less-than-significant level. Even with the implementation of Mitigation Measure (MM) TRA-1 at the project level, the project would be unable to reduce VMT impacts to a less-than-significant level, and the project's contribution to traffic/VMT in the surrounding area, in addition to those of the projects listed in Table 6-1 and other cumulative projects within the City, would be cumulatively significant.

6.1.3 AIR QUALITY

Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the San Diego Air Pollution Control District develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality.

The San Diego Air Basin (SDAB) has been designated as a federal nonattainment area for ozone and a state nonattainment area for ozone, particulate matter less than or equal to 10 microns in diameter, and particulate matter less than or equal to 2.5 microns in diameter. The air quality in the SDAB is the result of cumulative emissions from motor vehicles, off-road equipment, commercial and industrial facilities, and other emission sources. Projects that emit these pollutants or their precursors (i.e., volatile organic compounds and oxides of nitrogen for ozone) potentially contribute to worsened air quality. In analyzing cumulative impacts from a project, the analysis must specifically evaluate the project's contribution to the cumulative increase in pollutants for which the SDAB is designated as nonattainment for the California Ambient Air Quality Standards and National Ambient Air Quality Standards. If the project does not exceed thresholds and is determined to have less-than-significant project-specific impacts, it may still contribute to a significant cumulative impact on air quality if the emissions from the project, in combination with the emissions from other proposed or reasonably

foreseeable future projects, would be in excess of established thresholds. However, a project would only be considered to have a significant cumulative impact if the project's contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact).

Regarding short-term construction impacts, the San Diego Air Pollution Control District thresholds of significance are used to determine whether the project may have a short-term cumulative impact. As shown in Section 5.3.3.2, the project would not exceed any criteria air pollutant during construction or operations. Therefore, the project would have a less-than-significant cumulative impact during construction and operations.

Additionally, for the SDAB, the Regional Air Quality Strategy (RAQS) serves as the long-term regional air quality planning document for the purpose of assessing cumulative operational emissions in the basin to ensure the SDAB continues to make progress toward National Ambient Air Quality Standards and California Ambient Air Quality Standards attainment status. As such, cumulative projects located in the San Diego region would have the potential to result in a cumulative impact to air quality if, in combination, they would conflict with or obstruct implementation of the RAQS. Similarly, individual projects that are inconsistent with the regional planning documents upon which the RAQS is based would have the potential to result in cumulative operational impacts if they represent development and population increases beyond regional projections.

Regarding long-term cumulative operational emissions in relation to consistency with local air quality plans, the state implementation plan and RAQS serve as the primary air quality planning documents for the state and SDAB, respectively. The state implementation plan and RAQS rely on SANDAG growth projections based on population, vehicle trends, and land use plans developed by the cities and the County of San Diego as part of the development of their general plans. Therefore, projects that propose development that is consistent with the growth anticipated by local plans would be consistent with the state implementation plan and RAQS and would not be considered to result in cumulatively considerable impacts from operational emissions. Although the project proposes a Community Plan Amendment that would increase the residential density of the site, the proposed housing would be growth accommodating as detailed in Section 5.3.3. Thus, the project would not directly induce substantial unplanned population growth to the area. Thus, the proposed project would not result in significant regional growth that is not accounted for within the RAQS. As a result, the proposed project would not result in a cumulatively considerable contribution to pollutant emissions.

The City's Significance Determination Thresholds (City of San Diego 2022) carbon monoxide hotspot screening guidance was followed to determine if the project would require a site-specific hotspot analysis. The City recommends that a quantitative analysis of carbon monoxide hotspots be

performed if a proposed development would cause a six-lane or four-lane roadway to deteriorate to level of service E or worse, would cause a six-lane roadway to drop to level of service F, or would be within 400 feet of a sensitive receptor and the level of service is D or worse. The proposed project would not exceed the City's screening guidance for carbon monoxide hotspots.

The project's potential to expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates would be potentially significant because the unmitigated cancer risk of 45.20 in a million exceeds the CEQA threshold of 10 in a million. With the implementation of MM-AQ-1, the health risk assessment results of the proposed project would be reduced to less than significant. Cumulative localized impacts would potentially occur if project construction were to occur concurrently with another local cumulative project. No other projects involving substantial construction are proposed adjacent to the project, and the project construction emissions would not cumulatively combine with others to create a cumulative health risk issue. Localized emissions from each project would not be additive at the same receptors. Additionally, similar to the proposed project, other cumulative projects would be required to implement mitigation to reduce impacts to less than significant.

As a result, the proposed project would not result in a cumulatively considerable contribution to pollutant emissions. Impacts to air quality would not be cumulatively considerable during construction and operation.

6.1.4 BIOLOGICAL RESOURCES

Cumulative impacts consider how a project may affect biological resources on a regional scale. The cumulative biological resources are addressed city-wide via the City's Multiple Species Conservation Program (MSCP) Subarea Plan and Biology Guidelines. As discussed in Section 5.4, Biological Resources, the project would result in potentially significant direct impacts to special-status wildlife species including San Diegan tiger whiptail (*Aspidoscelis tigris stejnegeri*), orange-throated whiptail (*Aspidoscelis hyperythra*), Crotch's bumble bee (*Bombus crotchii)* (foraging habitat), red diamondback rattlesnake (*Crotalus ruber*), San Diego ringneck snake (*Diadophis punctatus similis*), two-striped gartersnake (*Thamnophis hammondii*), Dulzura pocket mouse (*Chaetodipus californicus femoralis*), northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), Cooper's hawk (*Accipiter cooperi*), and San Diego desert woodrat (*Neotoma lepida intermedia*) due to loss of habitat and potential mortality These impacts would be mitigated through implementation of MM-BIO-1 and MM-BIO-5. Indirect impacts to special-status wildlife species from construction-related activities would be reduced through standard construction measures as part of a condition of project approval. The project would result in impacts to sensitive upland vegetation communities, which would be reduced to less than significant through the implementation of MM-BIO-1 in accordance with the City's Biology Guidelines. The project would

result in potentially significant impacts to special-status plant species, which would be mitigated through the implementation of MM-BIO-2. Other cumulative projects would be similarly required to comply with regulations and policies pertaining to sensitive species and habitats that ultimately avoid significant cumulative impacts and ensure ongoing species sustainability. Thus, the project would not substantially contribute to a cumulative sensitive species or habitat impact.

The project would directly impact aquatic resources estimated to be under the jurisdiction of the Regional Water Quality Control Board (RWQCB) and California Department of Fish and Wildlife (CDFW), including emergent wetlands and natural flood channels. There are no City-defined wetlands resources adjacent to the proposed development and therefore no City-defined wetland buffers. Impacts associated with project construction and restoration activities within the areas potentially under the jurisdiction of RWQCB and/or CDFW are anticipated to be potentially significant. With implementation of MM-BIO-6, permit authorizations from CDFW and RWQCB would be obtained, and the project would be in compliance with CDFW and RWQCB mitigation requirements. Impacts after mitigation would be less than significant. Other cumulative projects would be similarly required to comply with regulations pertaining to jurisdictional resources. Thus, the project would not substantially contribute to a cumulative jurisdictional waters impact.

Impacts to wildlife corridors, habitat conservation plans, natural community conservation plans, other approved local regional or state habitat conservation plans, or any local policies or ordinances would be less than significant, as the project and all cumulative City-wide projects would comply with the MSCP and Biology Guidelines.

Impacts related to the introduction of invasive plant species to natural open space area would also be less than significant considering the project and cumulative project compliance with the MSCP Land Use Adjacency Guidelines invasive species control requirements.

In conclusion, the project and all future cumulative projects would be required to comply with all local, state and federal regulations pertaining to impacts to biological resources and implement similar project design features and mitigation measures, as appropriate, to ensure impacts would be less than significant. This includes the City's MSCP, Biology Guidelines, and Environmentally Sensitive Lands Regulations in addition to state and federal regulations. Considering this, impacts to biological resources would not be considerable and not be cumulatively significant.

6.1.5 ENERGY

Part 6 of Title 24 of the California Code of Regulations specifically establishes energy efficiency standards for residential and non-residential buildings constructed in the State of California in order to reduce energy demand and consumption. The proposed project, in addition to all cumulative projects, would be required to comply with Title 24, Part 6, per state regulations. In accordance with

Title 24, Part 6, the proposed project would have sensor-based lighting controls—for fixtures located near windows, the lighting would be adjusted by taking advantage of available natural light—and efficient process equipment—improved technology offers significant savings through more efficient processing equipment. Similar energy efficiency equipment would be required for the other cumulative projects as well.

Title 24, Part 11, contains voluntary and mandatory energy measures that are applicable to the proposed project and all other cumulative projects under the California Green Building Standards Code. Cumulative projects would result in an increased demand for electricity, natural gas, and petroleum. However, in accordance with Title 24, Part 11, mandatory compliance, each project applicant would have 50% of its construction and demolition waste diverted from landfills; mandatory inspections of energy systems to ensure optimal working efficiency; low pollutant-emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring, and particle boards; and a 20% reduction in indoor water use. Compliance with all of these mandatory measures would decrease the consumption of electricity, natural gas, and petroleum.

The proposed project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, either during project construction or operation. In addition, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Other cumulative projects would also be required to demonstrate compliance with regulations, which aim to increase energy efficiency and reduce wasteful or inefficient use. Impacts would not be cumulatively considerable.

6.1.6 GEOLOGIC CONDITIONS

As discussed in Section 5.6, Geologic Conditions, per the geotechnical investigation, no soils or geologic conditions were encountered that would preclude the development of the project site as proposed, with incorporation of the recommendations outlined in the geotechnical investigation. Short-term erosion and sedimentation impacts would be addressed through conformance with applicable elements of the City stormwater program and related National Pollutant Discharge Elimination System standards. Specifically, this would entail conformance with applicable City regulatory codes, as well as the National Pollutant Discharge Elimination System Construction General Permit.

Due to the localized nature of geology and soils, cumulative projects would address potential impacts to geology and soils on a project-by-project basis, as potential geologic hazards and soil composition vary by site. Each cumulative project would be required to assess individual and site-specific geologic conditions, which would inform the construction and development of each site. All cumulative development would be subject to similar requirements to those imposed and

implemented for the proposed project and would be required to adhere to applicable regulations, standards, and procedures. As such, the proposed project would result in impacts that would not be cumulatively considerable.

6.1.7 GREENHOUSE GAS EMISSIONS

Due to the global nature of the assessment of GHG emissions and the effects of global climate change, GHG emissions analysis, by its nature, is a cumulative impact analysis. Therefore, the information and analysis provided in Section 5.7, Greenhouse Gas Emissions, to determine project-level impacts, applies here.

As discussed in Section 5.7, projects that are consistent with the CAP would not have a cumulative GHG emissions impact. Projects that are not consistent with the CAP must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in the CAP Consistency Regulations to the extent feasible. Per Section 5.7, because the project would not be consistent with the existing land use and zoning designations or SANDAG growth assumptions, and emissions would be greater than assumed in the CAP, the project would result in a more GHG-intensive use when compared to the existing designations. The proposed project is not located within a Transit Priority Area (City of San Diego 2019) and would be increasing growth in non-GHG efficient areas in conflict with the CAP. As such, the project would be inconsistent with the CAP.

However, the project would not be consistent with City's CAP because the project would require a Community Plan Amendment and rezone and does not include a land use plan and/or zoning designation amendment that would result in an equivalent or less GHG-intensive project when compared to the existing designation. As such, following implementation of measures from the CAP Consistency Regulations and MM-GHG-1 through MM-GHG-3, impacts would remain significant and unavoidable because no mitigation is available to reduce impacts associated with the proposed change in land use. Therefore, the project would conflict with the City's CAP or an applicable plan, policy, or regulation for the purpose of reducing GHG emissions. Therefore, GHG emission impacts would be potentially significant and cumulatively considerable.

6.1.8 HEALTH AND SAFETY

As discussed in Section 5.8, Health and Safety, the proposed project is located on a site that is included on the Cortese List, a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The project site, under the name Cyprus Canyon, was identified on the GeoTracker, or RWQCB database (SWRCB 2024), as a Cleanup Program Site – Case DEH2020-LSAM-000640 and T10000016581. The case is still open under the Department of Environmental Health and Quality (DEHQ), though it is noted this case was opened under the anticipation of the site being

developed with a school and the project proposes residential. None-the-less, the project would be required to complete any soil remediation, Community Health and Safety Plan, and project design features deemed necessary for health safety under the oversight of the Department of Toxic Substances Control in conformance with regulations through implementation of Project Design Feature (PDF)-HAZ-1. The management and use of hazardous materials would occur in accordance with all applicable federal, state, and local laws and regulations, and a significant hazard to the public or environment would not result. Demolition of on-site structures has the potential to release asbestos and lead particles to the environment; elevated constituents of concern in soil and soil vapor on the project site create a potential impact to both construction and operation of the proposed project. However, compliance with the applicable laws and regulations, including San Diego Air Pollution Control District Regulation XI, Subpart M; California Occupational Safety and Health Administration asbestos rules; California Department of Public Health lead laws and regulations; and California Environmental Protection Agency disposal requirements would ensure that impacts to health and safety are less than significant.

As described in Section 5.8.1, the site has potential contamination from petroleum hydrocarbons, metals, and pesticides related to undocumented fill. The management and use of hazardous materials would occur in accordance with all applicable federal, state, and local laws and regulations, and a significant hazard to the public or environment would not result. Therefore, the project would not expose people to toxic substances from previous agricultural uses. Lastly, the project would not result in hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or wastes within 0.25 miles of an existing or proposed school.

Health and safety impacts are generally site specific and thus handled on a site-by-site basis. All projects identified in Table 6-1 would require the identification of existing hazardous materials on site and would be required to comply with existing regulations related to use, transport, and disposal of hazardous materials. Similarly, all related projects would be required to analyze and properly mitigate any impacts, if impacts are identified. Therefore, impacts would not be cumulatively considerable.

6.1.9 HISTORICAL RESOURCES

As discussed in Section 5.9, Historical Resources, there are no previously identified resources present within the project's area of potential effect. Therefore, there is low sensitivity for identifying intact subsurface archaeological deposits during project implementation and it is unlikely that buried historical resources would be encountered during ground disturbance associated with the project.

There is the potential for nearby cumulative projects, especially those that would result in ground-disturbing activities that would impact intact native soils, to inadvertently discover and adversely affect historical and archaeological resources. Cumulative projects would implement appropriate mitigation measures to reduce historical resources impacts to less than significant. When considered with other foreseeable projects and considering the project has a low potential for resources, cumulative impacts to historical resources would not be cumulatively considerable.

6.1.10 HYDROLOGY

As discussed in Section 5.10, Hydrology, the development of the proposed project and cumulative projects would result in an increase of impervious surfaces in the area. More specifically, other large development projects nearby would result in the conversion of large pervious areas to impervious. This would potentially result in increased surface runoff, alteration of the regional drainage pattern, and flooding. However, like the proposed project, each individual project applicant would be required to hydrologically engineer the respective project sites to ensure that post-development surface runoff flows can be accommodated by the regional drainage system. As such, with the implementation of storm drain facilities for each related project, if applicable, the proposed project would not result in a cumulative impact to hydrology. Therefore, the proposed project's contribution to a cumulative hydrology impact would not be cumulatively considerable.

6.1.11 NOISE

All of the cumulative projects listed in Table 6-1 are located over 0.25 miles from the project site and thus would be at a substantial distance such that noise would attenuate, and cumulative impacts would not occur.

As discussed in Section 5.11, Noise, with the implementation of MM-NOI-1, which requires the development of a Construction Noise Management Plan, short-term construction noise impacts would be less than significant. Additionally, MM-NOI-1 is not site-wide and is limited only to the locations identified in Section 5.11.3.1 (where proposed project construction activity is expected to occur as close as 10 feet to the property line based on the site plan).

As discussed above and in Section 5.11.3.1, while typical construction noise would not exceed the City's threshold, there is potential for noise to exceed the 75 A-weighted decibel sound equivalent level 12-hour City threshold at the nearest residential receiver on occasion. Thus, temporary construction-related noise impacts would be considered potentially significant unless mitigated. However, these impacts would be reduced to less than significant with the implementation of MM-NOI-1. It is anticipated that if any of the nearby cumulative projects would result in construction and/operational noise impacts, appropriate mitigation would be implemented to reduce potential impacts to less than significant, similar to the proposed project. In addition, there are no cumulative

projects with major construction activities adjacent or within a close enough distance to cumulatively combine construction noise with the project's to result in a significant impact. Therefore, noise impacts during operations would not be cumulatively considerable.

6.1.12 PALEONTOLOGY

As described in Section 5.12, Paleontological Resources, the project site is underlain by three formations with high-resource potential (Pomerado Conglomerate, Mission Valley Formation, and Friars Formation) for the occurrence of sensitive paleontological resources. Given the proximity of past fossil discoveries in the area, the underlying paleontologically sensitive deposits, and the relatively deep construction excavation planned, the project site has the potential to yield scientifically significant paleontological resources. However, the Project would comply with the SDMC and associated Paleontological Guidelines of the Land Development Manual, and impacts would be less than significant. There is the potential for nearby cumulative projects to potentially adversely affect paleontological resources. Cumulative projects within the City would comply with the SDMC and associated Paleontological Guidelines of the Land Development Manual and impacts would be less than significant. When considered with other foreseeable projects and considering project compliance with SDMC, impacts to paleontological impacts would not be cumulatively considerable.

6.1.13 POPULATION AND HOUSING

As discussed in Section 5.13, Population and Housing, the proposed project would introduce an estimated 318 people to the project site. Because the project proposes a rezone and a Community Plan Amendment to increase the density of the site, the estimated population of 318 people would likely not have been accounted for in SANDAG's projections. Similarly, the City's current Housing Element does not anticipate any housing development at the project site in order to meet the Regional Housing Needs Allocation. Four single-family residential dwelling units would be permitted on site under existing zoning and land use designation, but the project would exceed the current allowable density by allowing up to 112 units. The project would account for approximately 26% of the expected population growth in the Community Plan Area and approximately 40% of the estimated housing growth. As stated above, the project would help meet the need for the housing, both market rate (100 units) and affordable (12 units), that has been identified as a need statewide and locally.

Overall, under the current plans, the project site was assumed to maintain its use as a residential and open space. The project site currently has one residential unit on the site and the land use designation/zone would allow up to 4 units, which is substantially less than the 112 unit proposed development. Therefore, the project's induced population would exceed current projections. The City's portion of the County's Regional Housing Needs Allocation target for the 2021–2029 Housing

Element period is 108,036 homes (City of San Diego 2020). While the City is planning for additional housing to meet the need and targeted to permit more than 88,000 new housing units between 2010–2020, less than half of those units were constructed (42,275) as of December 2019 (City of San Diego 2020). Considering this, the proposed construction of 112 units is anticipated to help accommodate the existing and planned population and population growth anticipated in the City and help with the existing housing shortage. Although the project proposes a rezone and Community Plan Amendment that would allow for the site to increase in density, the proposed housing would be growth-accommodating. Thus, although the project would result in population growth, because the project would provide housing to assist with the City's housing shortage, this growth would not be considered substantial.

Various cumulative projects listed in Table 6-1 would either directly or indirectly induce population growth. The cumulative projects listed in Table 6-1 involve residential and mixed-use development projects that may increase population growth in the surrounding area. The commercial portions of the Scripps Mesa Joint Occupancy would generate a need for new employees, which, in general, has the potential to indirectly lead to population growth. However, the majority of the new employment opportunities that the project may generate are anticipated to be filled by the existing local population base, and thus the project would not contribute to new population growth due to an increase in employment opportunities. The introduction of a new population is not, in and of itself, a significant impact. As with a project-level analysis, the significance of a cumulative population impact is determined by whether the population growth resulting from the combined cumulative projects would be considered substantial. Similar to the City, the neighboring jurisdictions manage population growth and housing stock to meet their Regional Housing Needs Allocation. As with a project-level analysis, the significance of a cumulative population impact is determined by whether the population growth resulting from the combined cumulative projects would be considered substantial. In conjunction with other residential developments proposed in the surrounding area, the proposed project would not result in cumulative impacts to population and housing. Therefore, cumulative impacts to population and housing would not be cumulatively considerable.

6.1.14 PUBLIC SERVICES AND FACILITIES

As discussed in Section 5.14, Public Services and Facilities, the proposed project would introduce 112 dwelling units to the project area, resulting in an increase in population base within the Scripps Miramar Ranch and fire/police protection service area, thereby increasing the demand for fire/police protection and emergency services within the service area. However, no new or expanded facilities would be required as a result of the proposed project.

Nonetheless, the cumulative projects listed in Table 6-1 would result in additional demand for fire and police protection services and the potential need for additional fire or police protection

resources. However, all cumulative projects would be required to offset the increase in demand caused by their respective project. If a project triggers the need for new or altered police facilities, the physical impacts would be addressed within the environmental document prepared for the project, and mitigation measures would be applied as needed.

The project, as well as the cumulative projects identified in Table 6-1, would add to the cumulative demand for park and recreation facilities in the community. All residential projects that increase the demand for park and recreation needs in the City are required to provide park space and/or pay park in lieu-fees. The environmental documentation prepared for each project would analyze impacts associated with the construction of any parks within each overall development footprint.

As discussed in Section 5.14, the project site is located within the San Diego Unified School District (SDUSD) boundary. Thus, the project would be served by SDUSD for the provision of school services. Cumulative projects on Table 6-1 that have a residential component would generate students that would need to be accommodated by either SDUSD or another school district in the area. The project applicant would be required to contribute development fees to SDUSD. All of the cumulative projects included in Table 6-1 that would in would result in increased demand on schools would be required to pay school fees to offset the increase in demand, similar to the project. As such, with the contribution of required development fees by the proposed project and related projects, impacts would not be significant.

The nearest municipal library to the project is the Scripps Miramar Ranch Library, located 2.29 miles southwest of the project site, at 10301 Scripps Lake Drive. This local branch is part of the City's library system, which allows residents to use any branch or the main library, and the Serra Cooperative Library System, which allows residents of the City and County to use public library facilities. The Scripps Miramar Ranch Library does satisfy the General Plan's policy recommendation that every branch library be at least 15,000 square feet, as it is 21,700 square feet in size (City of San Diego 2021a). The Community Plan Area currently has an estimated population of 20,298 people. The project would introduce approximately 318 people to the project site, generating an estimated population of approximately 20,616, which is consistent with the General Plan standard that a branch library should serve a resident population of 30,000. Given the current estimated population with the addition of the population of the proposed project, there would be no need to construct additional library facilities. Therefore, impacts to library facilities would be less than significant.

Overall, impacts associated with public services as a result of the proposed project would not be cumulatively considerable.

6.1.15 PUBLIC UTILITIES

Water

Cumulative projects included in Table 6-1 would be serviced by the same water supply as the proposed project and would contribute to the cumulative demand for water supply and water infrastructure. The project would be consistent with regional water resource planning and applicable water supply regulations. Other cumulative projects that are consistent with the land use assumptions made in the Urban Water Management Plan would have already been accounted for in demand projections. Projects that are inconsistent with the land use assumptions made in the Urban Water Management Plan would also be required to demonstrate adequate supply for development. The project would be consistent with regional water resource planning and applicable water supply regulations, and cumulative impacts to water supply would not be cumulatively considerable.

Further, related projects would be required to assess whether adequate infrastructure exists to serve the related projects and whether additional or expanded water infrastructure would be required to be constructed in order to serve these related projects. Related projects would also be required to mitigate any potential impacts to water infrastructure caused by the project. All projects would be required to construct water infrastructure improvements in order to adequately serve the projects, if necessary. Thus, each cumulative project would be required to provide an individual assessment as to whether the project would contribute to a direct or cumulative impact to water services.

A private system improvement would be required for the project. Private systems would be designed in accordance with City standards and plumbing code standards. New public water systems and improvements would be installed prior to occupancy of each unit and would be adequately designed and sized to meet the project's water needs in conformance with City Design Guidelines and Standards. Additionally, the project would connect to existing and new public water mains adjacent to the project site and within the surrounding roadway. Cumulative impacts to water supply/service facilities would not be cumulatively considerable.

Wastewater

Project generated wastewater would account for 21.7 gallons per minute (31,360 gallons per day), which is only 0.02% of the remaining capacity at the Point Loma Wastewater Treatment Plant. Therefore, existing capacity at the wastewater treatment plant exists to accommodate the proposed project. Several upgrades to both private and public infrastructure would be required in order to accommodate the flows from the project; however, these upgrades have been included as part of the project and analyzed. Impacts would be less than significant as a result of the project.

Cumulative projects that result in an increase in density or development over what was accounted for could further exacerbate wastewater deficiencies. However, these projects would also be required to mitigate any potential impacts caused by the project. As such, cumulative impacts to wastewater facilities would not be cumulatively considerable.

Solid Waste

According to the City's Significance Determination Thresholds (City of San Diego 2022), cumulative impacts to solid waste facilities would be significant if a project includes the construction, demolition, and/or renovation of 40,000 square feet or more of building space. Projects that meet this criterion are required to prepare a project-specific waste management plan (WMP) to address waste generated during construction and operation. A project-specific WMP was prepared for the Project (Appendix M3) that identifies waste diversion measures. The measures identified in the WMP, when implemented, would ensure that potential cumulative impacts to solid waste management facilities would be below a level of significance. Similarly, cumulative projects would be required to comply with the City's Recycling Ordinance and prepare WMPs (for those that meet the 40,000-square-foot threshold) to show waste diversion measures.

As stated in Section 5.15, Public Utilities, in accordance with state diversion targets, a minimum of 75% of construction materials would be recycled (see Table 5.15-5). Regarding operation, all occupants shall participate in a recycling program by separating recyclable materials from other solid waste and depositing the recyclable materials in the recycling container provided for each unit. Recycling services are required by SDMC Section 66.0707. Therefore, impacts associated with solid waste would not be cumulatively considerable.

6.1.16 TRIBAL CULTURAL RESOURCES

As discussed in Section 5.16, Tribal Cultural Resources, no tribal cultural resources have been previously identified within the project site. The project's potential to result in an adverse change in the significance of a tribal cultural resource would be less than significant. There is the potential for nearby cumulative projects to potentially adversely affect tribal cultural resources. Therefore, cumulative discretionary projects would implement appropriate mitigation measures to reduce tribal cultural resources impacts. When considered with other foreseeable projects and considering the project's lack of impact to tribal cultural resources, impacts to tribal cultural resources would not be cumulatively considerable.

6.1.17 VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

The cumulative visual effects and neighborhood character study area consists of the viewshed. The project includes a residential development in an area that is surrounded by existing residential

development on all sides. The project is requesting a deviation from the SDMC to increase the height limit for development within the RX-1-2 zone from 30 to 36 feet for the proposed retaining wall. The project is also requesting a rezone of the project site from AR-1-1 zone to RX-1-2. While the project includes a rezone and a deviation, the project would not cause a cumulative effect by opening up a new area for development or cause an extensive view blockage in combination with other projects.

While scenic vistas are not identified, the Community Plan depicts hills, trees, water resources, Miramar Reservoir, Carroll Canyon, and subsidiary canyons as visual resources. Development of the project site would result in the removal of numerous eucalyptus trees that are identified in the Community Plan as important public resources. Due to the distance and elevation difference between the project site and potential visual resources, and because the proposed project is surrounded by existing residential development, the project would not cause substantial view blockage from a public viewing area of a public resource that is considered significant by the applicable community plan. Further, the project would be consistent with height and bulk regulations of the proposed zoning. Thus, the project would not have a substantial adverse effect on a scenic vista or view from a public viewing area as identified in the Community Plan. The project would include the removal of numerous on-site eucalyptus trees; however, they are not considered a significant community symbol or landmark, as detailed in Section 5.17. Additionally, the project would result in a temporary significant impact to the alteration of an existing landform during project construction.

Projects contributing to a cumulative aesthetic impact include those within the project viewshed. The viewshed encompasses the geographic area within which the viewer is most likely to observe the proposed project and surrounding uses. Typically, this is delineated based on topography, as elevated vantage points, such as from scenic vistas, offer unobstructed views of expansive visible landscapes. Of the cumulative projects listed in Table 6-1, project 2 is the only project within a similar viewshed to the project and visible from similar public viewing locations as the project.

Cumulative aesthetic impacts would occur if projects combined to result in substantial adverse impacts to the visual quality of the environment and increase sources of lighting and glare. As discussed in Section 5.17, the project would comply with the requirements of the SDMC and Land Use Adjacency Guidelines for lighting and glare requirements. Further, the project site is not located in a highly visible area and is developed on all sides with existing residential development. With implementation of existing regulations and the SDMC, the proposed project would not result in significant impacts related to obstruction of any vista or scenic view from a public viewing area as identified in the community plan; creation of a negative aesthetics site of project; bulk, scale, materials, or style that would be incompatible with surrounding development; substantial alteration to the existing or planned character of the area; or substantial light or glare. As described above, impacts related to the loss of a community identification symbol are particular to the projects within

the Community Plan Area, and the only cumulative project within the same plan area would include replacement of components of an existing wireless communication facility (project 2). Considering that the on-site eucalyptus trees are not considered a significant community symbol or landmark, the loss of these trees would not be cumulatively significant. Additionally, the project's landform alterations would be a temporary significant direct impact, but they would not combine cumulatively with other projects and would not be cumulatively significant.

Considering the known cumulative projects in the viewshed and the primarily built-out character of the viewshed, the project would not combine with cumulative visual impacts to result in cumulatively significant visual impacts.

6.1.18 WATER QUALITY

The City's Significance Determination Thresholds (City of San Diego 2022) note that compliance with applicable City (and related) water quality standards is assured through required permit conditions. Adherence to the City stormwater standards is thus considered adequate to preclude surface water quality impacts. In addition, the preparation of a stormwater pollution prevention plan, which would be implemented during construction, and preparation of project-specific stormwater quality management plan, which would be implemented during operation, would preclude potentially significant water quality impacts from occurring. All cumulative projects would 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. Water quality impacts would not be cumulatively considerable.

6.1.19 WILDFIRE

With regard to wildfire hazards, as shown in Figure 5.19-1 and discussed in Section 5.19, Wildfire, the project site is designated as a Very High Fire Hazard Severity Zone (City of San Diego 2021b). However, all projects proposed within the urban/wildland interface would be required to meet minimum fire fuel modification and/or clearing requirements in addition to meeting the standards of the various fire codes in effect at the time of building permit issuance. Currently, that is the 2022 California Fire Code, 2022 California Building Code, County requirements for enhanced building construction, and California State Fire Marshal requirements for fire resistive construction, in addition to meeting the requirements for brush management specified within the SDMC. For projects within the City, these requirements are implemented through the preparation of and compliance with a Brush Management Plan, which is reviewed and approved by the fire marshal and City Landscape Section.

As stated in Section 5.19, the fire chief may allow the implementation of alternative compliance measures to achieve an equivalency of a full defensible space as allowed under SDMC Section

142.0412(i). As such, the Fire Fuel Load Modeling Report prepared for the project (Appendix L3) provides an alternative approach that provides for a modified Zone 1 within the project's building areas and a modified Zone 2 thinning brush management zone (BMZ), which includes significant vertical separation of the developed area from off-site fuels (Figures 3-3a through 3-3c). The project proposes modified BMZ widths, which are considered appropriate alternative compliance, because the lots that are unable to meet the BMZ standards would include an approximately 6-foot fire wall to create a heat-deflecting surface and provide a vertical, non-combustible surface in the line of heat, fumes, flame, and embers traveling up the slope. BMZs in conjunction with proper long-term maintenance would substantially lower fire behavior intensity during peak weather conditions. This would provide the existing adjacent residential structures and proposed structures on site with the ability to survive a vegetation fire on the project site with little intervention of firefighting forces. The proposed combination of BMZs and alternative compliance measures would not increase hazards to on-site structures from wildland fires and hazards to adjacent properties. As such, through compliance with existing regulations and similar project design features, as applicable, cumulative impacts to wildfire would not be cumulatively considerable.

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SOURCE: Bing Maps 2021

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FIGURE 6-1

Cumulative Projects

EIR for the Renzulli Estates Project, City of San Diego, California

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CHAPTER 7 EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the California Environmental Quality Act Guidelines requires that an environmental impact report briefly describe potential environmental effects that were determined not to be significant and, therefore, were not discussed in detail in the environmental impact report. Based on initial environmental review, the City of San Diego (City) determined that the proposed Renzulli Estates Project (project) would not have the potential to cause significant impacts associated with the areas discussed below.

7.1 AGRICULTURAL AND FORESTRY RESOURCES

Issue 1: Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The entire project site is classified as "Other Land" and is immediately surrounded on all sides by land classified as "Urban and Built-Up Land" under the California Department of Conservation's Farmland Mapping and Monitoring Program (DOC 2022). No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is present on or within proximity to the project site. Therefore, the project would not result in the conversion of a substantial amount of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No impact would occur.

Issue 2: Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The project site is located on a 40.56-acre parcel in the northeast section of the City. The majority of the project site is undeveloped. However, it does include a large existing residence and other associated structures on site. Implementation of the project would include the demolition of the existing residence and associated structures and the development of 100 single-family residential units and 12 multifamily affordable income rental units.

The project site is currently zoned as Agricultural–Residential (AR) 1-1 and designated as Residential per the City's General Plan (City of San Diego 2008). An AR zone, as stated in San Diego Municipal Code Section 131.0331, accommodates numerous agricultural uses and permits the development of single-dwelling unit homes at a very low density. As such, implementation of the project would require a zoning amendment to the existing AR-1-1 zone to Residential–Small Lot (RX) 1-2 and Residential–Multiple Unit (RM) 2-4. The project site is not under a Williamson Act contract. Therefore, upon the approval of the proposed zoning amendment and because the project site is not or under a Williamson Act contract, no impact would occur.

Issue 3: Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

As discussed under Issue 2, the project site is currently zoned as Agricultural Residential and designated as Residential per the City's General Plan (City of San Diego 2008). The project site is not zoned for forest land (as defined in California Public Resources Code Section 12220[g]), timberland (as defined by California Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g]). As such, the project has no potential to conflict with such zoning, and no impact would occur.

Issue 4: Would the project result in the loss of forest land or conversion of forest land to non-forest use?

The project site does not include forest land and is surrounded by existing residences and recreational uses. Therefore, the project would not result in the loss or conversion land to non-forest use. No impact would occur.

Issue 5: Would the project involve changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

As discussed above, no Farmland or forest land is present at the project site. Therefore, the project would not involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use. No impact would occur.

7.2 MINERAL RESOURCES

Issue 1: Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

The California Department of Conservation classifies areas within the state as mineral resource zones (MRZ). Lands classified as MRZ-1 are areas where geologic information indicates no significant mineral deposits are present, MRZ-2 indicates lands where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence, and MRZ-3 areas contain mineral deposits the significance of which cannot be evaluated from available data. Lastly, lands classified MRZ-4 are areas of unknown mineral resource potential (DOC 2025). According to the City's General Plan, the project site is located within an area classified

as MRZ-2 (City of San Diego 2008). Despite the known mineral resource designation of the project site, the surrounding area has experienced increased urbanization and development with land uses (such as residential) incompatible with typical mineral extraction and processing operations. Similarly, the project site and surrounding area are historically and currently designated by the City's General Plan and zoned for uses that would preclude mineral resource operations. Therefore, the project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. No impact would occur.

Issue 2: Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

As discussed under Issue 1, the project site is located within an MRZ-2 area per the City's General Plan (City of San Diego 2008). However, despite the known mineral resource designation of the project site, the surrounding area has experienced increased urbanization and development with land uses (such as residential) incompatible with typical mineral extraction and processing operations. Similarly, the project site and surrounding area are historically and currently designated by the City's General Plan and zoned for uses that would preclude mineral resource operations. Therefore, the project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impact would occur.

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CHAPTER 8 MANDATORY DISCUSSION AREAS

This section addresses significant environmental impacts that cannot be avoided if the proposed Renzulli Estates Project (project) is implemented, significant irreversible environmental changes that would be involved should the project be implemented, and the growth-inducing impacts of the project.

8.1 SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED

Section 15126.2(b) of the California Environmental Quality Act (CEQA) Guidelines requires an environmental impact report (EIR) to identify significant environmental effects that cannot be avoided if a project is implemented (14 CCR 15000 et seq.). As discussed in Chapter 5, Environmental Analysis, of this EIR, implementation of the project would result in significant impacts related to the following issue areas: land use, transportation, air quality, biological resources, greenhouse gas emissions, noise, and visual effects and neighborhood character. Incorporation of mitigation measures would reduce the project's significant impacts to less than significant, except for land use, greenhouse gas emissions, transportation, and visual effects and neighborhood character, which would remain significant.

8.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES CAUSED BY THE PROJECT

CEQA Guidelines Section 15126.2(c) requires the evaluation of significant irreversible environmental changes that would occur should a project be implemented, as follows:

1. Primary impacts, such as the use of nonrenewable resources (i.e., biological habitat, agricultural land, mineral deposits, water bodies, energy resources, and cultural resources);
2. Secondary impacts, such as road improvements, which provide access to previously inaccessible areas; and
3. Environmental accidents potentially associated with the project.

Furthermore, Section 15126.2(d) of the CEQA Guidelines 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, historical resources, paleontological resources, or tribal cultural resources.

The project site includes an existing residence and two associated sheds. The project site is designated as Residential and Open Space with a density of 3–5 dwellings units per acre (Scripps Miramar Ranch Planning Committee et al. 2018) and zoned Agricultural–Residential (AR)-1-1, which allows agricultural uses and one dwelling unit per 10 acres. The project site does not contain agricultural or forestry resources. The project site and immediate surroundings are classified as Urban and Built-Up Land under the California Department of Conservation's Farmland Mapping and Monitoring Program (DOC 2022). No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is present on site. Although the project site is located within a Mineral Resource Zone 2, the area surrounding the project site has experienced increased urbanization and development with land uses (such as residential) incompatible with typical mineral extraction and processing operations. Additionally, the project site and surrounding area are historically and currently designated by the City of San Diego (City) General Plan and zoned for uses that would preclude mineral resource operations; therefore, the loss of renewable mineral resources is not considered significant at a project-specific level.

The project would require the commitment of energy and non-renewable resources, such as electricity, fossil fuels, natural gas, construction materials (e.g., concrete, asphalt, sand and gravel, steel, petrochemicals, and lumber), potable water, and labor during construction. New development within the project site would be required to comply with the California Energy Code (Title 24 of the California Code of Regulations) and California Green Building Standards Code. However, use of these resources on any level would have an incremental effect regionally and would, therefore, result in long-term irretrievable losses of non-renewable resources, such as fuel and energy.

Construction activities of the project would result in direct impacts to approximately 28.85 acres of native vegetation communities. Impacts to special-status plants and vegetation communities may result primarily from grading, clearing, and the construction of the proposed manufactured slope. Direct impacts to special-status wildlife species have a moderate to high potential to occur within the project area during construction activities. Additionally, indirect impacts to special-status plants and vegetation communities may result primarily from adverse "edge effects" associated with construction activates, which can include dust, the introduction of invasive plant species, erosion, and increased human presence, which could disrupt plant and vegetation vitality in the short term. Wildlife may be indirectly impacted in the short-term by construction-related noise and other adverse edge effects, such as the introduction of invasive and pest species. Short-term construction-related noise can result in the disruption of foraging, nesting, and reproductive activities of breeding bird, resulting in significant impacts. Although irreversible, direct impacts would be mitigated to a less-than-significant level by Mitigation Measure (MM) BIO-1, MM-BIO-2, MM-BIO-3, MM-BIO-4, and MM-BIO-5, as outlined in Section 5.4, Biological Resources. Additionally, direct impacts associated with project construction and restoration activities within the areas potentially under the jurisdiction

of the Regional Water Quality Control Board and/or California Department of Fish and Wildlife are anticipated to be potentially significant. Impacts to jurisdictional areas are expected to require permit authorization from California Department of Fish and Wildlife and Regional Water Quality Control Board, with compensatory mitigation requirements for impacts to natural flood channel and emergent wetland. With implementation of MM-BIO-6, impacts would be mitigated to less than significant.

The project would irreversibly change the visual appearance of the site. As discussed in Section 5.17, Visual Effects/Neighborhood Character, the project would result in a significant landform alteration impact. This visual impact involving a change from a natural hillside to a large manufactured slope cannot be mitigated and is considered irreversible.

As discussed in Section 5.2, Transportation, the residents' vehicle miles traveled (VMT) per capita for Census Tract 170.44 for the location of the project site is shown as 23.4, while the regional average VMT per resident is 18.9. Thus, the project does not meet the City's VMT screening criteria. The project would implement MM-TRA-1 to mitigate the project's VMT impacts; however, impacts associated with VMT would remain significant.

8.3 GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the CEQA Guidelines mandates that the growth-inducing impact of a project be discussed (14 CCR 15000 et seq.). This guideline states that the growth-inducing analysis is intended to address the potential for the project to "foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment," and to "encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively" through extension or expansion of existing services, utilities, or infrastructure. This second issue involves the potential for the project to induce further growth through the expansion or extension of existing services, utilities, or infrastructure. The CEQA Guidelines further state, "it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."

The City's CEQA Significance Determination Thresholds (City of San Diego 2022) state that a project would have a significant impact related to growth inducement if it would:

1. Induce substantial population growth in an area.
2. Substantially alter the planned location, distribution, density, or growth rate of the population of an area.

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

Short-Term Growth Inducement

During project construction, demand for various construction trade skills and labor would increase. It is anticipated that this demand would be met predominantly by the local labor force and would not require importation of a substantial number of workers or cause an increased demand for temporary or permanent local housing. Further, construction of the project is expected to take approximately 53 months. Since construction would be short term and temporary, it would not lead to an increase in employment on site that would stimulate the need for additional housing or services. Accordingly, no associated substantial short-term growth-inducing effects would result.

Long-Term Growth Inducement

Per the CEQA Guidelines, growth-inducing effects are not necessarily beneficial, detrimental, or of little significance to the environment. The project proposes to construct 100 single-family residences, 12 multifamily residences, and associated improvements and open space.

As discussed in Section 5.1, Land Use, the project site is designated as Residential and Park, Open Space, and Recreation in the City's General Plan (City of San Diego 2008) and Residential and Open Space under the Scripps Miramar Ranch Community Plan (Scripps Miramar Ranch Planning Committee et al. 2018). The entire project site is zoned as Agricultural–Residential (AR) 1-1, which limits residential use to 1 unit per 10 acres. Under the existing land use and zoning, the project site could be developed with up to four single-family units.

The project would include a Community Plan Amendment and a rezone to allow for the proposed 112-unit residential development on site. As described in Section 3.3.8, a Community Plan Amendment is required to change the existing density of the site from 1.1 dwellings units per acre, with a maximum of 45 units, to 2.7 dwellings units per acre, with a maximum of 112 units. The project would also require an amendment to downgrade the segment of Cypress Canyon Road that crosses the project site from a two-lane collector to a two-lane sub-collector. A rezone is also proposed to change the existing AR-1-1 zone to Residential–Small Lot (RX) 1-2, where the single-family homes are proposed, Residential–Multiple Unit (RM) 2-4 where the multifamily units are proposed, and Open Space–Residential (OR) 1-2 where open space is proposed. Per San Diego Municipal Code Section 131.0331, the AR zone accommodates a wide range of agricultural uses while also permitting the development of single dwelling unit homes at a very low density; specifically, AR-1-1 requires a minimum of 10-acre lots. Per San Diego Municipal Code Section 131.0422, the RX zone allows for both attached and detached single dwelling units on smaller lots

than required in the Residential Single Unit (RS) zones. RX-1-2 would require a minimum of 3,000-square-foot lots. The RM-2-4 permits a maximum density of 1 dwelling unit for each 1,750 square feet of lot area. The OR-1-2 zone allows open space with limited private residential development.

As discussed in Section 5.13, Population and Housing, the proposed project would directly induce growth through the development of a higher density residential development than what was previously planned, which would introduce new residents to the area. The proposed project's service population is based on the San Diego Association of Government's Series 13 Regional Growth Forecast, which estimates an average household size of 2.84 persons per household (SANDAG 2013). Utilizing the San Diego Association of Government's persons per household coefficient, the proposed project would introduce an estimated 318 people to the area. As discussed in Section 5.13, because the project would help accommodate the existing and planned population and population growth anticipated in the City and help with the existing housing shortage, the proposed project would not directly induce substantial growth through the development of residential land uses.

The City is currently in urgent need for housing and is experiencing a housing shortage, as discussed in the City's General Plan Housing Element 2021–2029. The City's portion of the County of San Diego's Regional Housing Needs Assessment target for the Housing Element 2021–2029 period is 108,036 homes (City of San Diego 2020). While the City is planning for additional housing to meet the need and targeted to permit more than 88,000 new housing units between 2010 and 2020, less than half of those units were constructed (42,275) as of December 2019 (City of San Diego 2020). Considering this, the proposed construction of 112 units is anticipated to help accommodate the existing and planned population and population growth anticipated in the City and help with the existing housing shortage. Therefore, the project would not directly induce substantial unplanned population growth to the area.

Regarding infrastructure, the properties surrounding the project site are served by existing public service and utility infrastructure. As discussed in Section 5.15, Public Utilities, the proposed project would use existing utility connections that serve the surrounding community to accommodate the internal utility infrastructure needs of the development. No major new infrastructure facilities are required specifically to accommodate the proposed project. No existing capacity deficiencies were identified for water, wastewater, or storm drain facilities that would serve the project. Furthermore, the project would not generate sewage flow or stormwater that would exceed the capacity already planned for the sewer line or storm drain. In addition, the internal roadway network proposed to be constructed within the project site would connect to the existing roadway network surrounding the project site. Since the project site is surrounded by existing development and would connect to existing utility infrastructure, implementation of the proposed project would not remove a barrier to economic or population growth through the construction or connection of new public utility infrastructure.

Despite the fact that the project's induced population would exceed current population and housing projections for the site, the proposed project would not induce substantial growth considering the housing shortage in the City and the need for additional housing to accommodate planned growth. Therefore, the project would not directly induce substantial unplanned population growth to the area. Refer to Section 5.13.3.1 for additional details.

CHAPTER 9 ALTERNATIVES

9.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that environmental impact reports (EIRs) contain an analysis of alternatives to the project that would avoid or substantially lessen environmental impacts. Section 15126.6(a) of the CEQA Guidelines states that an EIR should "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (14 CCR 15000 et seq.). The EIR is not required to address every possible alternative. The selection of alternatives is governed by a "rule of reason" that requires an EIR to evaluate only those alternatives necessary to permit a reasoned choice (Section 15126.6[f]). The EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons for that determination (Section 15126.6[c]). Additionally, CEQA requires discussion of a No Project Alternative to give decision makers the ability to compare impacts of approving the project with those of not approving the project (Section 15126.6[e]).

Per CEQA Guidelines Sections 15126.6(b) and (c), the focus of this analysis is to determine (1) whether alternatives are capable of avoiding or substantially lessening the significant environmental effects of the project, (2) the feasibility of alternatives, and (3) whether an alternative meets all or most of the basic project objectives. This chapter focuses on those alternatives that are capable of reducing or eliminating significant environmental impacts, even if they would impede the attainment of some project objectives or would be more costly. In accordance with Section 15126(f)(1) of the CEQA Guidelines, the factors that may be taken into account when addressing the feasibility of alternatives are site suitability; economic viability; availability of infrastructure; general plan consistency; other plans or regulatory limitations; jurisdictional boundaries; and whether the project proponent can reasonably acquire, control, or otherwise have access to an alternative site.

Pursuant to the CEQA Guidelines, a reasonable range of alternatives for the Renzulli Estates Project (project) is considered in this EIR. The discussion in this section provides a description of the alternatives considered, feasibility of the alternatives, and an analysis of whether the alternatives meet most of the objectives of the project. The alternatives analysis culminates in the identification of the environmentally superior project, consistent with CEQA Guidelines Section 15126.6(e)(2). The environmentally superior alternative is chosen based on the consideration of several factors, including the ability of the alternative to meet the project's objectives while reducing potentially significant impacts to the environment.

9.2 PROJECT OBJECTIVES

The following are the goals and objectives of the project:

1. Redevelop an underutilized site to contribute housing to the City of San Diego in response to regional housing needs.
2. Construct a variety of housing types at a density range that maximizes development potential consistent with the surrounding residential communities.
3. Provide affordable housing units to assist in meeting state and local needs.
4. Provide street improvements to connect the current termini of Cypress Canyon Road through the project site.
5. Implement a housing project that integrates with the Scripps Miramar Ranch community and has a cohesive design that is compatible in use, scale, and character with the surroundings.
6. Integrate the project into the existing topography of the site and cluster development in a manner that reduces the grading footprint, as well as impacts to environmental resources, and maximizes the preservation of the most biologically valuable resources on the project site.

9.3 SIGNIFICANT IMPACTS

As discussed throughout this EIR, implementation of the project would result in significant impacts to land use (Climate Action Plan [CAP]), transportation (vehicle miles traveled [VMT]), air quality (construction emissions cancer risk), biological resources (sensitive habitat, sensitive plants, sensitive wildlife, and jurisdictional wetlands), greenhouse gas (GHG) emissions (CAP), noise (construction), and visual effects (landform alteration). Impacts related to air quality, biological resources, and noise would be mitigated to below a level of significance with the implementation of mitigation measures identified in this EIR. Direct and cumulative impacts related to land use, transportation, and GHG emissions would remain significant and unavoidable. Direct impacts related to visual effects would also remain significant and unavoidable. The project alternatives evaluated below were developed to address the project's significant impacts.

9.4 ALTERNATIVES ELIMINATED FROM DETAILED CONSIDERATION

In accordance with CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and should briefly explain the lead agency's determination. Factors that may be used to eliminate alternatives from detailed consideration in an EIR include failure to meet most of the basic project objectives, infeasibility, or inability to avoid significant environmental effects. The following are

alternatives that have been rejected by the lead agency and do not require further analysis in this EIR.

Off-Site Location Alternative

Section 15126.6(f)(2) of the CEQA Guidelines provides that off-site alternatives should be considered if development is feasible and would avoid or substantially lessen the significant effects of the project. The project would result in impacts related to land use (CAP), transportation (VMT), air quality (construction emissions cancer risk), biological resources (sensitive habitat, sensitive plants, sensitive wildlife, and jurisdictional wetlands), GHG emissions (CAP), and noise (construction) that could potentially be avoided under different project site conditions. For example, an alternative location in an area that has no neighboring residential uses would avoid potential construction noise and air quality impacts of the proposed project. Siting in a location where the project would be consistent with the land use and zone would avoid CAP inconsistency impacts identified for land use and GHG emissions. An alternative location where there are no biological resources could avoid biological resource impacts of the project. The use of a flat site could also avoid the project's significant visual landform alteration impact. Factors that need to be considered when identifying an off-site alternative include the size of the site, its location relative to the general area, the General Plan (or other applicable planning document) land use designation, and the ability to meet the project objectives.

Although there are a few undeveloped parcels of similar size in the project area, as shown in Figure 5.1-1, those parcels are zoned as open space with biological resources present and would not be able to be developed under the current designation. Due to a lack of biological resource information, it is speculative to determine if these alternative locations would reduce biological impacts relative to the project. Given the designations of nearby off-site locations, this alternative would require a Community Plan Amendment to meet Objectives 1 through 3, 5, and 6, which require the development of housing. There are no other undeveloped parcels in the general vicinity of the project of comparable size that could support the development of single-family and multifamily residential. Similar to the proposed project, an off-site alternative could meet Objectives 1 through 3, 5, and 6 with a Community Plan Amendment since the alternative would include the same components as the proposed project in a different location. However, the off-site alternative would not reduce impacts associated with construction activities (air quality and noise) of the project as nearby locations would similarly be nearby neighboring residential uses and would include the same size footprint. Additionally, redevelopment of another site would not achieve Objective 4, which has the goal of providing street improvements to provide efficient access to the site by connecting Cypress Canyon Road. Therefore, the alternative would meet five out of six project objectives.

Ultimately, the applicant does not have ownership of any similarly sized land in the project area. The applicant cannot reasonably acquire, control, or otherwise have access to other sites in the area. Therefore, off-site alternatives were rejected from further consideration because this alternative is infeasible.

9.5 ALTERNATIVES UNDER CONSIDERATION

This analysis focuses on alternatives capable of avoiding or substantially lessening any of the significant effects of the project, even if the alternatives would impede, to some degree, the attainment of project objectives.

Per CEQA Guidelines Section 15126.6(e)(2), "the no project analysis shall discuss the existing conditions…as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, but based on current plans and consistent with available infrastructure and community services." Section 15126.6(e)(3)(B) also indicates that "in certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained."

The following alternatives have been identified for analysis: the No Project/No Development Alternative, No Project/Development Under Existing Community Plan Alternative, No Project/Development Under Existing Zoning Alternative, and Reduced Footprint Alternative.

9.6 ENVIRONMENTAL ANALYSIS

9.6.1 NO PROJECT/NO DEVELOPMENT ALTERNATIVE

Alternative Project Description

Under the No Project/No Development Alternative, the project would not be implemented and the site would remain in its current condition. The current site condition consists of a single-family residential unit, several outbuildings, and a road to the residential unit that connects to Cypress Canyon Road. The site would remain zoned as Agricultural–Residential (AR)-1-1 zone and the City's Multi-Habitat Planning Area (MHPA) boundary would remain as is, covering 33.4 acres of the project site.

Under this alternative, none of the direct or indirect environmental impacts associated with the construction and operation of the project would occur.

Project Objectives

By remaining in its current condition and including no development, the alternative would not meet Objectives 1 through 5, which include the development of the site in general, including housing and street improvements. While this alternative would reduce impacts to environmental resources and

maximize the preservation of the most biologically valuable resources on the site, which is a component of Objective 6, it would not integrate the project into the existing topography and would not include cluster development. The No Project/No Development Alternative would not meet any of the project objectives set forth in Section 9.2.

Land Use

The No Project/No Development Alternative would not include any new development and therefore would not conflict with the environmental principles, goals, and policies contained within the General Plan, the Scripps Miramar Ranch Community Plan (Community Plan), or the City's CAP. Overall, impacts to land use compared to the project would be avoided under this alternative. This alternative would eliminate the significant and unavoidable impact related to CAP consistency under the proposed project. Under this alternative, there would be no impacts to land use.

Transportation

Unlike the proposed project, the No Project/No Development Plan Alternative would not include circulation improvements, such as the extension of Cypress Canyon Road. This alternative would not result in development and therefore would not conflict with plans, policies, and regulations related to the transportation system. Overall, the project impact to VMT would be avoided under this alternative. This alternative would eliminate the significant and unavoidable VMT impact under the proposed project. Under this alternative, there would be no impacts to transportation.

Air Quality and Odor

The No Project/No Development Alternative would not include any new development and therefore would not have construction and operational emissions and would not exceed the significance thresholds for any criteria air pollutant. Overall, impacts associated with conflicts with air quality standards or a cumulatively considerable net increase of any criteria pollutant would be reduced compared to the proposed project. The significant mitigated impact related to construction emissions cancer risk would be avoided under this alternative. Under this alternative, there would be no impacts to air quality and odor.

Biological Resources

The No Project/No Development Alternative would not include any biological resources impacts or an adjustment of the MHPA boundary. Therefore, no impacts to biological resource would occur under this alternative, and project impacts to sensitive habitat, sensitive plants, sensitive wildlife, and jurisdictional wetlands would be avoided.

Energy

The No Project/No Development Alternative would not include any new development and would not increase energy consumption. Therefore, this alternative would have no energy impact, which would be less than the proposed project's less-than-significant impact. Geologic Conditions

The No Project/No Development Alternative would not include any new development and would not increase potential geologic hazards, erosion and sedimentation on site. Therefore, this alternative would have no geologic impact, which would be less than the proposed project's less-than-significant impact.

Greenhouse Gases

The No Project/No Development Alternative would not include any new development and therefore would not result in any change related to construction and operational emissions. This alternative would have no GHG impact and would avoid the project's significant GHG emission impact.

Health and Safety

The No Project/No Development Alternative would not include any new development and would not change health and safety risks. Any existing contaminated soils would not be disturbed. The potential issue with contaminated soils would persist and soil remediation may not occur. This alternative would have no health and safety impact, which would be less than the proposed project's less-than-significant impact. However, it is noted that soil remediation would occur as necessary in accordance with regulations under the proposed project.

Historical Resources

The No Project/No Development Alternative would not include any new development, ground disturbance, or demolition and would not impact historical resources. While the project would include grading, impacts to historical resources would be less than significant. Therefore, this alternative would have no historical resources impact, which would be less than the proposed project's less-than-significant impact.

Hydrology

The No Project/No Development Alternative would not include any new development and would not increase impervious surfaces or disturb existing drainage patterns. Therefore, this alternative would have no hydrology impact, which would be less than the proposed project's less-than-significant impact.

Noise

The No Project/No Development Alternative would not include any new development and would not increase noise. Therefore, this alternative would have no noise impact, which would be less than the proposed project's less-than-significant impact.

Paleontological Resources

The No Project/No Development Alternative would not include any new development, ground disturbance, or demolition and would not impact paleontological resources. Therefore, this alternative would have no paleontological resources impact, which would be less than the proposed project's less-than-significant impact.

Population and Housing

The No Project/No Development Alternative would not include any new housing that could increase population. Therefore, this alternative would have no population/housing impact, which would be less than the proposed project's less-than-significant impact. It is noted this alternative would not provide the benefit of additional housing.

Public Services and Facilities

The No Project/No Development Alternative would not include any new housing that could increase the demand for public services and facilities. Therefore, this alternative would have no public services and facilities impact, which would be less than the proposed project's less-than-significant impact.

Public Utilities

The No Project/No Development Alternative would not include any new housing that could increase the demand for public utilities. Therefore, this alternative would have no energy impact, which would be less than the proposed project's less-than-significant impact.

Tribal Cultural Resources

The No Project/No Development Alternative would not include any new development, ground disturbance, or demolition and would not impact tribal cultural resources. Therefore, this alternative would have no tribal cultural resources impact, which would be less than the proposed project's less-than-significant impact.

Visual Effect and Neighborhood Character

The No Project/No Development Alternative would not include any new development and there would no change to the existing visual effect and neighborhood character. Therefore, this alternative would have no visual impact, which would be less than the proposed project's significant impact.

Water Quality

The No Project/No Development Alternative would not include any new development and would not impact stormwater runoff or discharge. Therefore, this alternative would have no water quality impact, which would be less than the proposed project's less-than-significant impact.

Wildfire

The No Project/No Development Alternative would not include any new development and would not exacerbate wildfire risk. Therefore, this alternative would have no wildfire impact, which would be less than the proposed project's less-than-significant impact.

Impact Summary

As detailed above, the No Project/No Development Alternative would not result in any resource impacts, and all significant impacts of the project would be avoided. More specifically, this alternative would avoid the project's significant impacts related to land use (CAP), transportation (VMT), air quality (construction emissions cancer risk), biological resources (sensitive habitat, sensitive plants, sensitive wildlife, and jurisdictional wetlands), GHG emissions (CAP), noise (construction) and visual effect/neighborhood character (landform alteration).

9.6.2 NO PROJECT/DEVELOPMENT UNDER EXISTING ZONING ALTERNATIVE

Alternative Project Description

The No Project/Development Under Existing Zoning Alternative would be consistent with the existing zoning of the project site, AR-1-1 zone. This alternative assumes the maximum buildout of the project site given the existing AR-1-1 zoning designation density of 1 dwelling unit per 10 acres (1 du/10 ac). Given the approximately 40.56-acre size of the project site, this alternative would allow for the construction of up to four single-family residential units. It is assumed that the residential units would be centered within the interior portion of the property and that the portions of the project site that are currently designated as open space are assumed to be undeveloped. Grading and development of this alternative would only occur in the area designated as residential use and therefore would be reduced compared to the proposed project. Compared to the proposed project, this alternative would reduce the number of single-family homes from 100 to 4 units and would not

allow any multifamily residential units. The Development Under Existing Zoning Alternative would not include any affordable housing units and would not be subject to the Inclusionary Affordable Housing Ordinance because it would develop fewer than 10 units.

This Development Under Existing Zoning Alternative would require a Vesting Tentative Map, Site Development Permit, and MHPA boundary line adjustment (BLA), similar to the proposed project, but it would not require a Community Plan Amendment, Neighborhood Development Permit, or rezone.

Project Objectives

This alternative would meet Objectives 1 and 5 by redeveloping the same site as the proposed project with housing, although with fewer units. By reducing the number of units, the alternative would not provide affordable, multifamily units with a range of housing types and would not meet Objectives 2 or 3. This alternative would meet Objective 4, which requires street improvements to extend the roadway through the site. Objective 6 would also be met, by maximizing the preservation of biological resources by maintaining the existing open space. The Development Under Existing Zoning Alternative would meet four out of six project objectives.

Land Use

Similar to the project, the Development Under Existing Zoning Alternative would not conflict with the environmental principles, goals, and policies contained within the General Plan or the Community Plan.

This alternative would be consistent with the San Diego Municipal Code (SDMC) by complying with the allowable height of structures, as well as setback, width, depth, and frontage. In addition, similar to the proposed project, with the MHPA BLA this alternative would not conflict with the City's Multiple Species Conservation Program (MSCP) or an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan, or any local policies or ordinances. Overall, impacts to land use would be similar under this alternative compared to the project.

However, unlike the proposed project, this alternative would not conflict with the City's CAP because the alternative would be consistent with the existing Community Plan and zoning and thus would result in operational GHG emissions consistent with what was assumed under the CAP. Impacts to land use compared to the project would be avoided under this alternative. This alternative would eliminate the significant and unavoidable impacts under the proposed project and would not require implementation of Mitigation Measure (MM)-GHG-1 through MM-GHG-3. Impacts would be less than significant. Overall, impacts to land use would be reduced compared to the proposed project.

Transportation

The Development Under Existing Zoning Alternative would not include circulation improvements, such as the extension of Cypress Canyon Road. Access to the Development Under Existing Zoning Alternative would only be provided from the southeast. This alternative would not require a deviation from SDMC Section 142.0560(j)(1). Similar to the proposed project, this alternative would not result in inadequate emergency access or create hazardous design features. This alternative would also be consistent with plans, policies, and regulations related to the transportation system.

The alternative would result in a reduction in single-family homes from 100 to 4 units and would not allow any multifamily residential units. As such, vehicle trips would be reduced in comparison to the proposed project. This alternative would meet the small-project VMT screening criteria; therefore, this alternative would eliminate the significant and unavoidable impacts under the proposed project and would not require implementation of MM-TRA-1. Impacts would be less than significant. Overall, impacts to land use would be reduced compared to the proposed project.

Air Quality and Odor

Construction and operational emissions under the Development Under Existing Zoning Alternative would not exceed the significance thresholds for any criteria air pollutant. Similar to the project, the overlapping construction and operational emissions would also not exceed any significance thresholds. Overall, impacts associated with conflicts with air quality standards or a cumulatively considerable net increase of any criteria pollutant would be reduced with this alternative and less than significant.

This alternative would have the potential to expose sensitive receptors to substantial pollutant concentrations, including air toxics such as diesel particulates during construction activities, but the impacts would be reduced compared to the proposed project due to the reduction in units and associated construction activities. Overall, impacts to air quality would be less than significant and would not require MM-AQ-1. The project's significant mitigated impact related to health risk would be avoided under this alternative.

Biological Resources

The Development Under Existing Zoning Alternative would have a reduced footprint compared to the project. This alternative would result in an overall reduction of impacts to sensitive upland habitat and would not require the implementation of MM-BIO-1. However, direct and indirect biological resource impacts would still occur with this alternative. This alternative would still be required to implement MM-BIO-2 through MM-BIO-5 to reduce impacts to below a level of significance. Similar to the project, this alternative would not result in direct or indirect impacts to

wildlife movement, wildlife corridors, or nursery sites. Impacts resulting from a conflict with any local policies or ordinances protecting biological resources would not occur, as the alternative would be consistent with the City's Environmentally Sensitive Lands Regulations and Biology Guidelines. The alternative would not result in impacts related to the introduction of invasive plant species to a natural open space area.

Similar to the project, the alternative, even with a reduced footprint, would have the potential to impact MSCP covered plant species and MSCP covered wildlife species and would conflict with provisions of the MSCP. With the inclusion of MM-BIO-2, which would translocate certain special-status plant species within the impact area to within the upland habitat area created on site, impacts would be less than significant. Overall, impacts to biological resources would be reduced compared to the proposed project.

Energy

Similar to the proposed project, although the Development Under Existing Zoning Alternative would increase petroleum use during operation as a result of residents commuting to the site, the use would be a small fraction of the statewide and countywide use and, due to efficiency increases, would diminish over time. Petroleum consumption associated with the construction and operation of this alternative would not be inefficient or wasteful and would be substantially reduced compared to the proposed project due to a reduction in residential development.

Because the proposed project and this alternative would comply with Title 24 of the California Code of Regulations, Part 6 and Part 11 and would be consistent with the City's General Plan Conservation Element policies pertaining to energy use, no conflict with existing energy standards and regulations would occur. Therefore, similar to the proposed project, energy impacts would be less than significant; however, impacts would be reduced in comparison to the proposed project.

Geologic Conditions

The Development Under Existing Zoning Alternative would be constructed on the same project site, with the same underlying geotechnical conditions. Therefore, similar to the proposed project, with the implementation of the recommendations and appropriate building design measures consistent with the International Building Code/California Building Code, the risk of potential effects from geologic hazards would be reduced to an acceptable level. Similarly, based on the implementation of appropriate erosion and sediment control best management practices (BMPs) as part of, and in conformance with, an approved stormwater pollution prevention plan (SWPPP) and related City and National Pollutant Discharge Elimination System requirements, associated potential erosion and sedimentation impacts from implementation of this alternative would be less than significant. However, this alternative would center the disturbance on the center of the site, which would result

in a reduced development footprint and associated geologic impacts. As such, impacts would be reduced in comparison to the proposed project.

Greenhouse Gases

Under the Development Under Existing Zoning Alternative, construction and operational GHG emissions would be reduced because the alternative would be developed under the existing zoning, which allows for only four units. As such, this alternative would not conflict with the City's CAP because the alternative would be consistent with the existing Community Plan and zoning and thus would result in operational GHG emissions consistent with what was assumed under the CAP. As such, this alternative would not conflict with the City's CAP or any applicable plan, policy, or regulation for the purpose of reducing GHG emissions. Overall, construction and operational GHG emissions would be reduced compared to the proposed project. Similar to the discussion provided under Land Use, above, this alternative would eliminate the significant and unavoidable impact under the proposed project and would not require implementation of MM-GHG-1 through MM-GHG-3. Impacts would be less than significant. Impacts to GHG emissions would be reduced compared to the proposed project.

Health and Safety

The Development Under Existing Zoning Alternative would have the same potential risks associated with health and safety as the proposed project. The project site is on the Cortese List, a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, a significant hazard to the public or environment would not result; regulatory compliance and review of structures to be demolished by a qualified/certified technician would ensure that exposure to toxic building materials would not occur. Lastly, this alternative would not result in hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school.

This alternative would not result in airport safety hazards for people residing or working in the project area. In addition, regulatory compliance required as part of the alternative's condition of approval would ensure potential impacts associated with fire hazards and prevention, including alternative compliance measures, would be less than significant, similar to the project. Impacts associated with health and safety would be similar to the proposed project.

Historical Resources

Due to the low sensitivity for identifying intact subsurface archaeological deposits, it is unlikely that buried historical resources would be encountered during ground disturbance associated with the Development Under Existing Zoning Alternative, similar to the project. Therefore, the alternative's

potential to result in an adverse physical or aesthetic effect and/or destruction of a prehistoric or historic archaeological site, structure, or object would be less than significant. Moreover, no existing religious or sacred uses are located on the project site. No existing formal cemeteries or known burials are identified within the project site. In the event of an unanticipated discovery of human remains, the alternative would proceed in accordance with regulations. Overall, impacts related to historical resources would be slightly reduced compared to the project due to the reduced footprint and reduced potential of inadvertent discoveries.

Hydrology

The Development Under Existing Zoning Alternative would increase impervious surfaces on site. However, due to the reduced footprint, the change in impervious surfaces would be less than the proposed project. Overall, similar to the project, this alternative would not result in increased runoff or have an adverse effect on drainage patterns. Less-than-significant impacts would occur. Hydrology impacts associated with this alternative would be reduced in comparison to the proposed project.

Noise

Noise associated with construction under the Development Under Existing Zoning Alternative would be reduced compared to the project due to fewer housing units proposed for development and associated grading. A similar array of construction activities would result, but construction activities would be less intensive. By only developing areas that have an existing designation of residential, this alternative would have a reduced footprint, and the grading and construction activities for this alternative would occur at a greater distance from the nearest noise-sensitive receptors identified for the proposed project. Further, the equipment quantities are assumed to be less due to the reduced footprint. Therefore, noise associated with construction activities is not anticipated to exceed the City's 12-hour average noise standard of 75 A-weighted decibels.

Additionally, impacts from construction noise and groundborne vibration to biological resources would be reduced compared to the proposed project. Impacts would be less than significant. During operation, the alternative would result in reduced noise impacts related to outdoor heating, ventilation, and air conditioning equipment and project-related off-site traffic noise. Lastly, similar to the proposed project, the site is not located within any Marine Corps Air Station Miramar Air Installations Compatible Use Zones. Impacts would be less than significant.

Overall, since the number of residential units would be reduced compared to the proposed project, the level of noise during the operational scenario would be reduced compared to the proposed project and would be less than significant without mitigation.

Paleontological Resources

Similar to the proposed project, because grading would exceed the CEQA Significance Determination Thresholds, the Development Under Existing Zoning Alternative would be subject to the grading ordinance (SDMC Section 142.0151) and the requirement for paleontological monitoring. In accordance with Appendix P of the City's Land Development Manual, regulatory compliance would preclude impacts to paleontological resources; thus, impacts would be less than significant and reduced compared to the proposed project due to reduced grading.

Population and Housing

Compared to the proposed project, which would result in an increase of 318 people to the site, the Development Under Existing Zoning Alternative would result in the increase of approximately 12 people.[1] This alternative would not exceed current population and housing projections for the site. The alternative would not indirectly or directly induce substantial unplanned population growth to the area, similar to the project. Thus, impacts would be less than significant. Additionally, similar to the project, this alternative would not result in the expansion of infrastructure that would trigger an indirect population increase to the area. Overall, impacts would be reduced compared to the proposed project due to the reduction in anticipated population growth.

Public Services and Facilities

The Development Under the Existing Zoning Alternative would result in fewer units being developed and would generate fewer people, which would reduce the impact to fire and police services, schools, and libraries. Fewer calls would be generated for emergency or medical services in the future, and fewer students would attend surrounding schools. Although impacts to public services from the proposed project would be less than significant, the severity of impacts would be reduced under this alternative.

Public Utilities

The Development Under Existing Zoning Alternative would reduce the demand on water supply, reduce the amount of wastewater generated, and reduce the amount of solid waste generated given the reduction in development when compared to the proposed project. Overall, impacts associated with utilities would be reduced under this alternative and would be less than significant.

[1] 4 units × 2.84 persons per household = 11.36 or 12 people.

Tribal Cultural Resources

The Development Under Existing Zoning Alternative would result in reduced grading and a smaller footprint compared to the project. However, similar to the proposed project, no tribal cultural resources have been previously identified within the project site, and no impacts to such resources would occur under this alternative. As such, impacts would be less than significant. Under this alternative, impacts would be the same as the proposed project.

Visual Effect and Neighborhood Character

The Development Under Existing Zoning Alternative would not require deviations from the zoning code (i.e., allowable height of structures, setback, width, depth, and frontage), and visual impacts would be reduced in comparison to the proposed project due to the reduced footprint and scale. Similar to the project, this alternative would not substantially block a view through a designated public view corridor. This alternative would not require as much grading and would reduce impacts resulting from changes to landform compared to the project, to less than significant. Overall, less-than-significant impacts would occur, and impacts would be reduced compared to the proposed project. The project's significant and unmitigated landform alteration impact would be avoided by the Development Under Existing Zoning Alternative.

Water Quality

The Development Under Existing Zoning Alternative would be required to comply with project-specific site design, source control, and treatment control BMPs, low-impact development practices, project design measures, related maintenance efforts, and City stormwater standards and associated requirements, similar to the proposed project. Implementation of these state-mandated measures and the required SWPPP for this alternative would ensure that short-term impacts from construction-related activities would not violate any water quality standards or waste discharge requirements and would not further contribute to water quality impacts identified in the Clean Water Act Section 303(d) List of Water Quality Limited Segments. Similar to the project, drainage flow volumes would remain the same as under existing conditions or would decrease following project implementation.

In conclusion, runoff from the project site would not adversely affect surface waters, water quality, or discharge pollutants to an already impaired water body under this alternative, and impacts would be less than significant. Impacts would be the same under this alternative as the proposed project.

Wildfire

Similar to the proposed project, the Development Under Existing Zoning Alternative would not impair or physically interfere with an adopted emergency response or evacuation plan. The alternative would comply with applicable state and City standards associated with fire hazards and prevention, including alternative compliance measures. Similarly, the assessment of the project area's fire history, historical weather and wind data, terrain, and fuels concludes that the project would not exacerbate wildfire risks. Implementation of this alternative would not change these considerations or conclusions. Therefore, the alternative would not exacerbate wildfire risk during construction or operation, and impacts would be less than significant. Overall, impacts associated with wildfire would be the same as the proposed project.

Impact Summary

The Development Under Existing Zoning Alternative would avoid the project's significant and unavoidable impacts associated with land use, transportation, GHG emissions, and visual effects, and would not require implementation of the associated mitigation measures. This alternative would therefore avoid the project's significant impacts.

Biological resources impacts would be less than significant with mitigation under the proposed project and would be largely reduced under the Development Under Existing Zoning Alternative. This alternative would avoid the project's significant mitigated air quality impact. The following issue areas would also be reduced under this alternative but do not require mitigation: energy, geologic conditions, historical resources, hydrology, paleontological resources, population and housing, public services and facilities, and public utilities. Noise impacts would be reduced and would no longer require mitigation to be less than significant. This alternative would have similar impacts as the proposed project to the following issue areas without mitigation: health and safety, tribal cultural resources, water quality, and wildfire.

None of the impacts associated with this alternative would be greater than those of the proposed project. Overall, this alternative would reduce the severity of impacts compared to the proposed project, including reducing land use, GHG, transportation, and visual effects and neighborhood character impacts to less than significant.

9.6.3 DEVELOPMENT UNDER EXISTING COMMUNITY PLAN ALTERNATIVE

Alternative Project Description

The Development Under the Existing Community Plan Alternative would be consistent with the existing Community Plan. This alternative assumes the maximum buildout of the project site given

the existing Community Plan designations for the site. The Community Plan designates the project site as open space and single-family residential. Specifically, 25.57 acres of the site are designated as open space and 15.03 acres are designated for residential use. The residential designation has a density of 3–5 dwelling units per acre (du/ac) and a maximum of 45 units, resulting in a density of 1.1 du/ac (Scripps Miramar Ranch Planning Committee et al. 2018). This alternative assumes the maximum of 45 units. The areas designated as open space are assumed to be undeveloped. Therefore, grading and development would only occur in the area designated as residential use and would be less than the proposed project. Compared to the proposed project, this would reduce the number of single-family homes from 100 to 45 units and would not allow any multifamily residential units. In accordance with the Inclusionary Affordable Housing Ordinance, 10% of units would be affordable housing units. Similar to the project, Cypress Canyon Road would also be extended through the project site under this alternative and the off-site BLA addition parcel would be a part of the alternative project.

This Development Under the Existing Community Plan Alternative would require a Vesting Tentative Map, Site Development Permit, and MHPA BLA, similar to the proposed project, but it would not require a Community Plan Amendment, or Neighborhood Development Permit. This alternative would require a rezone, as the AR-1-1 zone only allows for one single-family lot per 10 acres (4 units at the site).

Project Objectives

This alternative would meet Objective. 1 and 5 by redeveloping the same site as the proposed project with housing, although with fewer units. By reducing the number of units, the alternative would not provide multifamily units with a range of housing types and would not meet Objective 2. The alternative would meet Objective 3 and 4 by providing affordable housing, although less than the proposed project, and implementing street improvements. Objective 6 would also be met by maximizing the preservation of biological resources by maintaining the existing open space. The Development Under the Existing Community Plan Alternative would meet five out of six project objectives.

Land Use

Similar to the project, the Development Under the Existing Community Plan Alternative would not conflict with the environmental principles, goals, and policies contained within the General Plan or the Community Plan. However, unlike the proposed project, this alternative would not conflict with the City's CAP because the alternative would be consistent with the existing Community Plan and, thus, would result in operational GHG emissions consistent with what was assumed under the CAP. In addition, similar to the proposed project, with the MHPA BLA this alternative would not conflict

with the City's MSCP or an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan, or any local policies or ordinances. Overall, impacts to land use compared to the project would be avoided under this alternative. This alternative would eliminate the significant and unavoidable impact under the proposed project. However, the alternative would not reduce the need for MM-GHG-1 through MM-GHG-3. Impacts would be less than significant.

Transportation

Similar to the proposed project, the Development Under the Existing Community Plan Alternative would include circulation improvements, such as the extension of Cypress Canyon Road and 16-foot-wide driveways with a 3-foot flare on each side, which would require a deviation from SDMC Section 142.0560(j)(1), Table 42-05N. This deviation is described further under Section 3.3.8. Similar to the proposed project, this alternative would not result in inadequate emergency access or create hazardous design features. This alternative would also be consistent with plans, policies, and regulations related to the transportation system.

The alternative would result in a reduction in single-family homes from 100 to 45 units and would not allow any multifamily residential units. As such, vehicle trips would reduce in comparison to the proposed project. However, this alternative, as a residential project, would not meet the VMT screening criteria (detailed further in Table 5.2-1). The alternative would be located in the same census tract as the proposed project and VMT per capita would be the same as the proposed project. Impacts would still be significant and unavoidable even with implementation of MM-TRA-1; however, they would be reduced when compared to the project.

Air Quality and Odor

Construction and operational emissions under the Development Under the Existing Community Plan Alternative would not exceed the significance thresholds for any criteria air pollutant. Similar to the project, the overlapping construction and operational emissions would also not exceed any significance thresholds. Overall, impacts associated with conflicts with air quality standards or a cumulatively considerable net increase of any criteria pollutant would be reduced with this alternative and less than significant.

This alternative would have the potential to expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates during construction activities, but the impacts would be reduced compared to the proposed project due to reduction in units and associated construction activities. As such, this alternative would require the implementation of MM-AQ-1 to reduce impacts to a less-than-significant level. Overall, impacts to air quality would be reduced compared to the proposed project.

Biological Resources

The Development Under the Existing Community Plan Alternative would result in direct impacts to sensitive upland vegetation communities from construction activities, but these would be reduced compared to the proposed project. While designated open space would be preserved, the MHPA BLA would still be required because the area designated for residential development under the Existing Community Plan also includes portions within the MHPA. Additionally, the alternative would impact special-status plant species and special-status wildlife species. As such, implementation of MM-BIO-1 would be required to reduce impacts to a less-than-significant level. With the inclusion of MM-BIO-2, which would translocate certain special-status plant species within the project impact area to within the upland habitat area created on site, impacts would be less than significant. Moreover, this alternative would require a pre-construction survey to be conducted, as required by MM-BIO-3. Overall, impacts under this alternative would be similar to the project and would be less than significant with the incorporation of these mitigation measures.

Similar to the project, impacts associated with the alternative's construction and restoration activities within the areas potentially under the jurisdiction of Regional Water Quality Control Board (RWQCB) and/or California Department of Fish and Wildlife (CDFW) would be potentially significant. Additionally, impacts to jurisdictional areas would require permit authorization from CDFW and RWQCB, with compensatory mitigation requirements for impacts to natural flood channels and emergent wetlands. With implementation of MM-BIO-4, permit authorizations from CDFW and RWQCB would be obtained and the alternative would be in compliance with CDFW and RWQCB mitigation requirements. Overall, impacts would be reduced compared to the proposed project, but, similar to the proposed project, impacts would be less than significant after mitigation.

Similar to the project, the alternative would impact MSCP covered plant species and MSCP covered wildlife species and would conflict with the provisions of the MSCP. With the inclusion of MM-BIO-1, which includes upland habitat mitigation, and MM-BIO-2, which would translocate certain special-status plant species within the impact area to within the upland habitat area created on site, impacts would be less than significant.

No direct or indirect impacts to wildlife movement, wildlife corridors, or nursery sites are expected with implementation of this alternative, similar to the project. Impacts resulting from a conflict with any local policies or ordinances protecting biological resources would not occur as the alternative would be consistent with the City's Environmentally Sensitive Lands Regulations and Biology Guidelines. The alternative would not result in impacts related to the introduction of invasive plant species to natural open space area. Overall, impacts to biological resources would be reduced compared to the proposed project.

Energy

Similar to the proposed project, although the Development Under the Existing Community Plan Alternative would increase petroleum use during operation as a result of residents commuting to the site, the use would be a small fraction of the statewide and countywide use and, due to efficiency increases, would diminish over time. Petroleum consumption associated with construction and operation of this alternative would not be inefficient or wasteful and would be slightly reduced compared to the proposed project due to a reduction in residential development.

Because the proposed project and this alternative would comply with Title 24 of the California Code of Regulations, Part 6 and Part 11, would be consistent with the City's General Plan Conservation Element policies pertaining to energy use, no conflict with existing energy standards and regulations would occur. Therefore, similar to the proposed project, energy impacts would be less than significant; however, impacts would be reduced in comparison to the proposed project.

Geologic Conditions

The Development Under the Existing Community Plan Alternative would be constructed on the same project site, with the same underlying geotechnical conditions. Therefore, similar to the proposed project, with the implementation of the recommendations and appropriate building design measures consistent with the International Building Code/California Building Code the risk of potential effects from geologic hazards would be reduced to an acceptable level. Similarly, based on the implementation of appropriate erosion and sediment control BMPs as part of, and in conformance with, an approved SWPPP and related City and National Pollutant Discharge Elimination System requirements, associated potential erosion and sedimentation impacts from implementation of this alternative would be less than significant. Impacts would be similar to the proposed project.

Greenhouse Gases

Under the Development Under the Existing Community Plan Alternative, construction and operational GHG emissions would be reduced because the alternative would be developed under the existing Community Plan, which was analyzed in the CAP. As such, this alternative would not conflict with the City's CAP or any applicable plan, policy, or regulation for the purpose of reducing GHG emissions. Overall, construction and operational GHG emissions would be reduced compared to the proposed project. Similar to the discussion provided under Land Use, above, this alternative would eliminate the significant and unavoidable impact under the proposed project. The alternative would not reduce the need for MM-GHG-1 through MM-GHG-3. Impacts would be less than significant.

Health and Safety

The Development Under the Existing Community Plan Alternative would have the same potential risks associated with health and safety as the proposed project. The project site is on the Cortese List, a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, a significant hazard to the public or environment would not result; regulatory compliance and review of structures to be demolished by a qualified/certified technician would ensure exposure to toxic building materials would not occur. Lastly, this alternative would not result in hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within 0.25 miles of an existing or proposed school.

This alternative would not result in airport safety hazards for people residing or working in the project area. In addition, regulatory compliance required as part of the alternative's condition of approval would ensure potential impacts associated with fire hazards and prevention, including alternative compliance measures, would be less than significant, similar to the project. Impacts associated with health and safety would be similar to the proposed project.

Historical Resources

Due to the low sensitivity for identifying intact subsurface archaeological deposits, it is unlikely that buried historical resources would be encountered during ground disturbance associated with the Development Under the Existing Community Plan Alternative, similar to the project. Therefore, the alternative's potential to result in an adverse physical or aesthetic effect and/or destruction of a prehistoric or historic archaeological site, structure, or object would be less than significant. Moreover, no existing religious or sacred uses are located on the project site. No existing formal cemeteries or known burials are identified within the project site. In the event of an unanticipated discovery of human remains, the alternative would proceed in accordance with regulations. Overall, impacts related to historical resources would be the same as the project.

Hydrology

The Development Under the Existing Community Plan Alternative would increase impervious surfaces compared to existing conditions, but this impact would be reduced compared to the proposed project. However, the project would not result in increased runoff or have an adverse effect on drainage patterns. Although reduced compared to the proposed project, this alternative would decrease runoff flows. Even though the alternative would include drainage improvements on site, the flow would ultimately discharge to the same location downstream and there would be no changes to the general drainage patterns. Less-than-significant impacts to hydrology would occur. Hydrology impacts associated with this alternative would be similar to the proposed project.

Noise

Noise associated with construction under the Development Under the Existing Community Plan Alternative would be reduced compared to the project due to fewer housing units proposed for development and associated grading. A similar array of construction activities would result, but construction activities would be less intensive. By only developing areas that have an existing designation of residential, this alternative would have a reduced footprint and the grading and construction activities for this alternative would occur at a greater distance from the nearest noise-sensitive receptors identified for the proposed project. Further, the equipment quantities are assumed to be less due to the reduced footprint. Therefore, noise associated with construction activities are not anticipated to exceed the City's 12-hour average noise standard of 75 A-weighted decibels.

Additionally, impacts from construction noise to biological resources and groundborne vibration would be reduced compared to the proposed project. Impacts would be less than significant. During operation, the alternative would result in reduced noise impacts related to outdoor heating, ventilation, and air conditioning equipment and project-related off-site traffic noise. Lastly, similar to the proposed project, the site is not located within any Marine Corps Air Station Miramar Air Installations Compatible Use Zones. Impacts would be less than significant.

Overall, since the number of residential units would be reduced compared to the proposed project, the level of noise during operational scenario would be reduced compared to the proposed project and would be less than significant.

Paleontological Resources

Similar to the proposed project, because grading would exceed the CEQA Significance Determination Thresholds, the Development Under the Existing Community Plan Alternative would be subject to the grading ordinance (SDMC Section 142.0151) and the requirement for paleontological monitoring. In accordance with Appendix P of the City's Land Development Manual, regulatory compliance would preclude impacts to paleontological resources; thus, impacts would be less than significant and reduced compared to the proposed project due to reduced grading.

Population and Housing

Compared to the proposed project, which would result in an increase of 318 people to the site, the Development Under the Existing Community Plan Alternative would result in the generation of 128 people.[2] Despite the fact that the alternative's induced population would exceed current population

[2] 45 units × 2.84 persons per household = 127.8 or 128 people.

and housing projections for the site, this alternative would provide housing within the City where there is a need for additional housing to accommodate planned growth. The alternative would not indirectly or directly induce substantial unplanned population growth to the area, similar to the project. Thus, impacts would be less than significant. Additionally, similar to the project, this alternative would not result in the expansion of infrastructure that would trigger an indirect population increase to the area. Overall, impacts would be reduced compared to the proposed project due to the reduction in anticipated population growth.

Public Services and Facilities

The Development Under the Existing Community Plan Alternative would result in fewer units being developed and would generate fewer people, which would reduce the impact to fire and police services, schools, and libraries. Fewer calls would be generated for emergency or medical service in the future, and fewer students would attend surrounding schools. Although impacts to public services from the proposed project would be less than significant, the severity of impacts would be slightly reduced under this alternative.

Public Utilities

The Development Under the Existing Community Plan Alternative would reduce the demand on water supply, reduce the amount of wastewater generated, and reduce the amount of solid waste generated given the reduction in development when compared to the proposed project. Overall, impacts associated with utilities would be reduced under this alternative and would be less than significant.

Tribal Cultural Resources

This alternative is located on the same site as the proposed project but has a smaller footprint. As discussed under Section 5.16, no tribal cultural resources have been previously identified within the project site and no impacts to such resources would occur under the proposed project. Therefore, no impacts would occur under the Development Under the Existing Community Plan Alternative, which has a smaller footprint on the same site. As such, impacts would be less than significant.

Visual Effect and Neighborhood Character

Visual impacts would be similar to the proposed project, although the Development Under the Existing Community Plan Alternative would not require deviations from the zoning code associated with allowable height of structures, as well as setback, width, depth, and frontage deviations, as compared to the project. Further, this alternative would not substantially block a view through a designated public view corridor, public viewing area, public road, or viewpoint. Also, this alternative

would not create a negative aesthetic site, as development would occur in an organized manner, guided by a site plan and in compliance with the SDMC. Further, preservation of open space around the development and landscaping would create variation to avoid a monotonous visual environment and attract attention away from any walls. The alternative would be designed similar to the proposed project and would be compatible with surrounding development and the existing character of the area without significantly changing the community design.

This alternative would also require removal of eucalyptus trees on site, resulting in a similar less-than-significant impact as the project. Regarding changes to landform, this alternative would require grading that would alter the existing landform during construction, although the footprint would be reduced compared to the proposed project and would avoid the creation of large, manufactured slopes and associated landform alteration impacts. The alternative's lighting would be fully shielded and directed downward, similar to the project, causing a less-than-significant impact. Overall, less-than-significant impacts would occur, reduced from the proposed project's significant visual (landform alteration) impact.

Water Quality

The Development Under the Existing Community Plan Alternative would be required to comply project-specific site design, source control and treatment control BMPs, low impact development practices, project design measures, related maintenance efforts, and City stormwater standards and associated requirements, similar to the proposed project. Implementation of these state-mandated measures and the required SWPPP for this alternative would ensure that short-term impacts from construction-related activities would not violate any water quality standards or waste discharge requirements and would not further contribute to water quality impacts identified in the Clean Water Act Section 303(d) List of Water Quality Limited Segments. Similar to the project, drainage flow volumes would remain the same as under existing conditions or would decrease following project implementation.

In conclusion, runoff from the project site would not adversely affect surface waters, water quality, or discharge pollutants to an already impaired water body under this alternative and impacts would be less than significant. Impacts would be the same under this alternative.

Wildfire

Similar to the proposed project, the Development Under the Existing Community Plan Alternative would not impair or physically interfere with an adopted emergency response or evacuation plan. The alternative would comply with applicable state and City standards associated with fire hazards and prevention, including alternative compliance measures. Similarly, the assessment of the project area's fire history, historical weather and wind data, terrain, and fuels concludes that the project

would not exacerbate wildfire risks. Implementation of this alternative would not change these considerations or conclusions. Therefore, the alternative would not exacerbate wildfire risk during construction or operation, and impacts would be less than significant. Overall, impacts associated with wildfire would be the same as the proposed project.

Impact Summary

The Development Under the Existing Community Plan Alternative would reduce the severity of the project's significant and unavoidable impacts associated with land use, transportation, and GHG emissions. This alternative would avoid the project's significant impacts to land use and GHG emissions but would still require implementation of GHG mitigation measures to reduce impacts to less than significant with mitigation. However, transportation impacts would remain significant and unavoidable under this alternative even with implementation of mitigation measures, and this alternative would therefore not avoid some of the project's significant impacts.

Air quality and biological resources impacts would be less than significant with mitigation under the proposed project and would be slightly reduced under the Development Under Existing Community Plan Alternative. The following issue areas would also be reduced under this alternative but do not require mitigation: paleontological resources, population and housing, public services and facilities, and public utilities. Impacts related to visual effects and neighborhood character would be reduced from significant and unavoidable to less than significant. Noise impacts would be reduced and would no longer require mitigation to be less than significant. This alternative would have similar impacts as the proposed project to the following issue areas without mitigation: geologic conditions, health and safety, historical resources, hydrology, tribal cultural resources, water quality, and wildfire.

None of the impacts associated with this alternative would be greater than those of the proposed project. Overall, this alternative would reduce the severity of impacts compared to the proposed project, including reducing land use and GHG impacts to less than significant with mitigation, but would still maintain the same significant and unavoidable impact to transportation.

9.6.4 REDUCED FOOTPRINT ALTERNATIVE

Alternative Project Description

The Reduced Footprint Alternative would result in the development of 7.1 acres on site focused on the portion of the site that has been previously disturbed and developed. The purpose of this alternative is to reduce biological resource impacts to Tiers I–III vegetation communities. This alternative would include a connection to Cypress Canyon Road. In addition, in order to accommodate 112 units within the reduced footprint, the Reduced Footprint Alternative would

result in an increase in density at the project site, from 2.7 du/ac under the proposed project to 15.8 du/ac. The reduced footprint alternative would require a height deviation to have a maximum height of 40 feet. Therefore, the proposed residential uses would be developed as multifamily.

The same discretionary actions as required for the project would also be required for this alternative, as well as a right-of way vacation of the existing unpaved right-of-way at the off-site MHPA BLA addition. Discretionary approvals for this alternative would include a rezone, Community Plan Amendment, MHPA BLA, Neighborhood Development Permit, and Site Development Permit. In addition, a height deviation request would need to be increased in comparison to the proposed project to account for the smaller footprint.

Project Objectives

This alternative would meet Objective No. 1 by developing housing on the same site as the proposed project. By limiting the housing types to only multifamily residential, the alternative would not construct a variety of housing types at a density range that maximizes development potential consistent with the surrounding residential communities and would not meet Objective 2. In accordance with the Inclusionary Affordable Housing Ordinance, 10% of units would be affordable housing units and Objective 3 would be met. As mentioned, this alternative would include street improvements to Cypress Canyon Road and Objective No. 4 would be met. Objectives 5 and 6 would be met through compliance with the Community Plan and use of the existing disturbed areas. The Reduced Footprint Alternative would meet five out of six project objectives.

Land Use

Similar to the project, the Reduced Footprint Alternative would not conflict with the environmental principles, goals, and policies contained within the General Plan or the Community Plan. This alternative would still require deviations from the zoning code associated with allowable height of structures, as well as setback, width, depth, and frontage deviations. Height deviations requested as a result of this alternative would be greater than those requested as part of the proposed project. As mentioned above, the height of the alternative would be greater than the proposed project to account for the same number of units in a smaller footprint. However, the requested deviations would not affect any other environmental issue or sensitive resource. In addition, similar to the proposed project, with the MHPA BLA this alternative would not conflict with the City's MSCP or an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan, or any local policies or ordinances. Overall, impacts to land use would be similar under this alternative compared to the project. This alternative would conflict with the City's CAP because the proposed density would be more GHG-intensive than what

was assumed in the CAP for the project site. Implementation of MM-GHG-1 through MM-GHG-3 would be required. However, the impacts would remain significant.

Transportation

The alternative would increase in density when compared to the proposed project. However, this alternative would result in the same number of units, except all would be developed as multifamily residential units. With 112 units at 8 trips per unit (for under 20 dwelling units/acre), the average daily traffic is estimated to be 896 compared to the 1,096 of the proposed project. As such, vehicle trips would be reduced in comparison to the proposed project. Furthermore, this alternative, as a residential project, would not meet the VMT screening criteria (detailed further in Table 5.2-1). The alternative would be located in the same census tract as the proposed project and VMT per resident would be the same as the proposed project. Impacts would still be significant and unavoidable even with implementation of MM-TRA-1. Overall, impacts would be reduced compared to the project regarding VMT, but still significant and unavoidable.

Air Quality and Odor

Construction air quality impacts were determined to be less than significant as part of the proposed project, and since the grading would be reduced under the Reduced Footprint Alternative, construction impacts would be reduced. As with the project, all other criteria air pollutant emissions associated with construction of this alternative would be less than significant.

At a reduced level compared to the proposed project, this alternative would have the potential to expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates during construction activities. As such, this alternative would require the implementation of the same air quality mitigation measure as the proposed project, MM-AQ-1, to reduce impacts to a less-than-significant level. However, impacts to air quality would be reduced compared to the proposed project.

Biological Resources

The Reduced Footprint Alternative would have a reduced footprint compared to the project. This alternative would result in an approximate reduction of 1.3 acres of scrub oak chaparral, 3.2 acres of Diegan coastal sage scrub, 2.0 acres of flat-topped buckwheat scrub, 4.1 acres of coastal sage scrub transition, and 5.7 acres of southern mixed chaparral. This alternative would result in an overall reduction of impacts to sensitive upland habitat and would not require the implementation of MM-BIO-1. However, direct and indirect biological resource impacts would still occur with this alternative. This alternative would still be required to implement MM-BIO-2 through MM-BIO-5 to reduce impacts to below a level of significance. Similar to the project, this alternative would not result in

direct or indirect impacts to wildlife movement, wildlife corridors, or nursery sites. Impacts resulting from a conflict with any local policies or ordinances protecting biological resources would not occur as the alternative would be consistent with the City's Environmentally Sensitive Lands Regulations and Biology Guidelines. The alternative would not result in impacts related to the introduction of invasive plant species to a natural open space area.

Similar to the project, the alternative, even with a reduced footprint, would have the potential to impact MSCP covered plant species and MSCP covered wildlife species and would conflict with provisions of the MSCP. With the inclusion of MM-BIO-2, which would translocate certain special-status plant species within the impact area to within the upland habitat area created on site, impacts would be less than significant. Overall, impacts to biological resources would be reduced compared to the proposed project.

Energy

The Reduced Footprint Alternative would increase petroleum use during construction as a result of truck, haul, and vendor trips to the project site. Fuel consumption from construction equipment would be less than the proposed project due to the reduced amount of grading required. The Reduced Footprint Alternative would increase petroleum use during operation as a result of residents commuting to the site; however, the use would be a small fraction of the statewide and countywide use and, due to efficiency increases, would diminish over time. Petroleum consumption associated with construction and operation of this alternative would not be inefficient or wasteful and would be reduced compared to the proposed project due to the nature of multifamily units, despite the same number of units proposed for development. In general, multifamily units use less energy resources than single-family units.

Because the proposed project and this alternative would comply with Title 24, Part 6 and Part 11, of the California Code of Regulations and would be consistent with the City's General Plan Conservation Element policies pertaining to energy use, no conflict with existing energy standards and regulations would occur. Therefore, similar to the proposed project, energy impacts would be less than significant; however, a reduction in impacts would occur with the switch from single-family to multifamily units.

Geologic Conditions

The Reduced Footprint Alternative would be constructed on the same project site, with the same underlying geotechnical conditions. Therefore, similar to the proposed project, with implementation of the recommendations and appropriate building design measures consistent with the International Building Code/California Building Code, the risk of potential effects from geologic hazards would be reduced to an acceptable level. Similarly, based on implementation of appropriate

erosion and sediment control BMPs as part of, and in conformance with, an approved SWPPP and related City and National Pollutant Discharge Elimination System requirements, associated potential erosion and sedimentation impacts from implementation of this alternative would be less than significant. Impacts would be the same as the proposed project.

Greenhouse Gases

Under the Reduced Footprint Alternative, construction and operational GHG emissions would be reduced compared to the proposed project. Even though this alternative would have the same number of housing units, a reduced footprint would be proposed with multifamily units instead of single-family units. As such, because of the reduced footprint and all multifamily residential units, a reduced amount of traffic would be generated. Similar to the proposed project, this alternative would conflict with the City's CAP because the proposed density would be more GHG-intensive than what was assumed in the CAP for the project site. Similar to the project, implementation of MM-GHG-1 through MM-GHG-3 would be required. While the alternative would have reduced GHG emissions than the proposed project, impacts would remain significant under the alternative even with the implementation of mitigation.

Health and Safety

The Reduced Footprint Alternative would have the same potential risks associated with health and safety as the proposed project. The project site is on the Cortese List, list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Similar to the project, this alternative would be required to complete cleanup requirements prior to issuance of building permits. Remediation would be overseen by the Department of Environmental Health and Quality. However, a significant hazard to the public or environment would not result; regulatory compliance and review of structures to be demolished by a qualified/certified technician would ensure exposure to toxic building materials would not occur. Lastly, this alternative would not result in hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within 0.25 miles of an existing or proposed school.

This alternative would not result in airport safety hazards for people residing or working in the project area. In addition, regulatory compliance required as part of the project's condition of approval would ensure potential impacts associated with fire hazards and prevention, including alternative compliance measures, would be less than significant, similar to the project. Impacts associated with health and safety would be similar to the proposed project.

Historical Resources

Due to the low sensitivity for identifying intact subsurface archaeological deposits, it is unlikely that buried historical resources would be encountered during ground disturbance associated with the Reduced Footprint Alternative, similar to the project. Therefore, the alternative's potential to result in an adverse physical or aesthetic effect and/or destruction of a prehistoric or historic archaeological site, structure, or object would be less than significant. Moreover, no existing religious or sacred uses are located on the project site. No existing formal cemeteries or known burials are identified within the project site. In the event of an unanticipated discovery of human remains, the alternative would proceed in accordance with regulations. Overall, impacts related to historical resources would be slightly reduced compared to the project due to the reduced footprint and reduced potential of inadvertent discoveries.

Hydrology

The Reduced Footprint Alternative would increase impervious surfaces on site. However, due to the reduced footprint, the change in impervious surfaces would be less than the proposed project. Overall, similar to the project, this alternative would not result in increased runoff or have an adverse effect on drainage patterns. Less-than-significant impacts would occur. Hydrology impacts associated with this alternative would be reduced in comparison to the proposed project.

Noise

Noise associated with construction under the Reduced Footprint Alternative would be reduced compared to the proposed project given the reduced footprint proposed for development and associated grading. By developing the project on a reduced footprint, this alternative would have a reduced amount of grading and construction activities would occur at a greater distance from the nearest noise-sensitive receptors identified for the proposed project. Further, the equipment quantities are assumed to be less given the reduced footprint. Therefore, noise associated with construction activities are not anticipated to exceed the City's 12-hour average noise standard of 75 A-weighted decibels, and construction noise impacts would be further reduced with implementation of MM-NOI-1.

Additionally, impacts of construction noise to biological resources and groundborne vibration would be reduced compared to the proposed project. Impacts would be less than significant. During operation, the alternative would result in similar noise impacts related to outdoor heating, ventilation, and air conditioning equipment and project-related off-site traffic noise. Lastly, similar to the proposed project, the site is not located within any Marine Corps Air Station Miramar Air Installations Compatible Use Zones. Impacts would be less than significant.

Even though the number of residential units would be the same as the proposed project, the footprint and associated grading would be reduced; thus, the level of noise during construction and under an operational scenario would be reduced compared to the proposed project and would be less than significant.

Paleontological Resources

Similar to the proposed project, because grading would exceed the CEQA Significance Determination Thresholds, the Reduced Footprint Alternative would be subject to the grading ordinance (SDMC Section 142.0151) and the requirement for paleontological monitoring. In accordance with Appendix P of the City's Land Development Manual, regulatory compliance would preclude impacts to paleontological resources; thus, impacts would be less than significant, similar to the proposed project, albeit slightly reduced due to the reduced footprint.

Population and Housing

The Reduced Footprint Alternative would generate the same number of people as the proposed project. Similar to the project, despite the fact that the alternative's induced population would exceed current population and housing projections for the site, this alternative would provide housing within the City where there is a need for additional housing to accommodate planned growth. The alternative would not indirectly or directly induce substantial unplanned population growth to the area. Thus, impacts would be less than significant. Additionally, similar to the project, this alternative would not result in the expansion of infrastructure that would trigger an indirect population increase to the area. Overall, impacts would be the same as the proposed project.

Public Services and Facilities

The Reduced Footprint Alternative would result in the same number of units being developed and would generate the same amount of people, which would result in a similar impact to fire and police services, schools, parks, and libraries. The same number of calls would be generated for emergency or medical services in the future, and the same number of students would attend surrounding schools. Impacts to public services as a result of the proposed project would be less than significant, as would impacts under this alternative. Impacts would be the same.

Public Utilities

The Reduced Footprint Alternative would result in reduced needs for water supply, would generate reduced wastewater demand, and would generate reduced amounts of solid waste. In general, multifamily units use less water and generate less solid waste than single-family homes.

Overall, impacts associated with utilities would be reduced under this alternative and would be less than significant.

Tribal Cultural Resources

The Reduced Footprint Alternative would result in reduced grading and footprint compared to the project. However, similar to the proposed project, no tribal cultural resources have been previously identified within the project site and no impacts to such resources would occur under this alternative. As such, impacts would be less than significant. Under this alternative, impacts would be the same as the proposed project.

Visual Effect and Neighborhood Character

Although the Reduced Footprint Alternative would require deviations from the zoning code (i.e., allowable height of structures, setback, width, depth, and frontage), visual impacts would be reduced in comparison to the proposed project due to the reduced footprint. Similar to the project, this alternative would not substantially block a view through a designated public view corridor. Implementation of the Reduced Footprint Alternative would reduce the grading impacts and reduce land alteration impacts to less than significant. Overall, less-than-significant impacts would occur, and impacts would be reduced compared to the proposed project.

Water Quality

The Reduced Footprint Alternative would be required to comply with project-specific site design, source control and treatment control BMPs, low impact development practices, project design measures, related maintenance efforts, and City stormwater standards and associated requirements, similar to the proposed project. Implementation of these state-mandated measures and implementation of the required SWPPP for this alternative would ensure that short-term impacts from construction-related activities would not violate any water quality standards or waste discharge requirements and would not further contribute to water quality impacts identified in the Clean Water Act Section 303(d) List of Water Quality Limited Segments. Similar to the project, drainage flow volumes would remain the same as under existing conditions or would decrease following project implementation.

Overall, runoff from the project site would not adversely affect surface waters, water quality, or discharge pollutants to an already impaired water body under this alternative. Impacts would be the same as the proposed project under this alternative.

Wildfire

Similar to the proposed project, the Reduced Footprint Alternative would not impair or physically interfere with an adopted emergency response or evacuation plan. The alternative would comply with applicable state and City standards associated with fire hazards and prevention, including alternative compliance measures. Similarly, the assessment of the project area's fire history, historical weather and wind data, terrain, and fuels concludes that the project would not exacerbate wildfire risks. Implementation of this alternative would not change these considerations or conclusions. Therefore, the alternative would not exacerbate wildfire risk during construction or operation, and impacts would be less than significant. Overall, impacts associated with wildfire would be the same as the proposed project.

Impact Summary

The Reduced Footprint Alternative would not reduce or avoid the project's significant and unavoidable impacts to land use or GHG emissions, even with the implementation of GHG mitigation measures. This alternative would reduce the severity of the project's significant impacts to transportation but would still have significant and unavoidable impacts even with the implementation of mitigation measures. This alternative would avoid the project's significant landform alteration visual impact, as grading would be reduced to avoid the creation of large, manufactured slopes.

Air quality and biological resources would be less than significant with mitigation under the proposed project and would be slightly reduced under the Reduced Footprint Alternative. The following issue areas would also be reduced under this alternative but do not require mitigation: historical resources, hydrology, paleontological resources, and public utilities. Noise impacts would be reduced and would no longer require mitigation to be less than significant. This alternative would have similar impacts as the proposed project to the following issue areas without mitigation: geologic conditions, health and safety, population and housing, public services and facilities, tribal cultural resources, water quality, and wildfire.

None of the impacts associated with the Reduced Footprint Alternative would be greater than those of the proposed project. Significant mitigated impacts to air quality and biological resources would be reduced. This alternative would reduce the severity of GHG and transportation impacts compared to the proposed project but would still result in significant and unavoidable impacts. This alternative would avoid the project's significant and unmitigated visual impacts related to landform alteration.

9.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

As shown in Table 9-1, the No Project/No Development Alternative would have the fewest impacts. Under this alternative, however, none of the project objectives would be met. Section 15126.6(e)(2) of the CEQA Guidelines states that if the No Project Alternative is the environmentally superior alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives. Thus, the environmentally superior alternative, as identified in the analysis above, would be the No Project/Development Under Existing Zoning Alternative. This alternative would avoid the project's significant and unavoidable impacts related to transportation, GHG, land use, and visual effects, and would meet four out of six project objectives, as described under Section 9.6.2.

Table 9-1 summarizes the potential impacts of the alternatives evaluated as compared to the potential impacts of the project.

Table 9-1
Summary of Impacts for Each Alternative

Issue	Project	No Project/No Development Alternative	Development Under Existing Zoning Alternative (4 single-family units)	Development Under Existing Community Plan Alternative (40 single-family units)	Reduced Footprint Alternative (112 multifamily units)
Land Use	SU	LTS/NI (-)	LTS/NI (-)	SM (-)	SU (=)
Transportation	SU	LTS/NI (-)	LTS/NI (-)	SU (-)	SU (-)
Air Quality and Odor	SM	LTS/NI (-)	LTS/NI (-)	SM (-)	SM (-)
Biological Resources	SM	LTS/NI (-)	SM (-)	SM (-)	SM (-)
Energy	LTS/NI	LTS/NI (-)	LTS/NI (-)	LTS/NI (-)	LTS/NI (-)
Geologic Conditions	LTS/NI	LTS/NI (-)	LTS/NI (-)	LTS/NI (=)	LTS/NI (=)
Greenhouse Gases	SU	LTS/NI (-)	LTS/NI (-)	SM (-)	SU (-)
Health and Safety	LTS/NI	LTS/NI (-)	LTS/NI (=)	LTS/NI (=)	LTS/NI (=)
Historical Resources	LTS/NI	LTS/NI (-)	LTS/NI (-)	LTS/NI (=)	LTS/NI (-)
Hydrology	LTS/NI	LTS/NI (-)	LTS/NI (-)	LTS/NI (=)	LTS/NI (-)
Noise	SM	LTS/NI (-)	LTS/NI (-)	LTS/NI (-)	SM (-)

Table 9-1
Summary of Impacts for Each Alternative

Issue	Project	No Project/No Development Alternative	Development Under Existing Zoning Alternative (4 single-family units)	Development Under Existing Community Plan Alternative (40 single-family units)	Reduced Footprint Alternative (112 multifamily units)
Paleontological Resources	LTS/NI	LTS/NI (-)	LTS/NI (-)	LTS/NI (-)	LTS/NI (-)
Population and Housing	LTS/NI	LTS/NI (-)	LTS/NI (-)	LTS/NI (-)	LTS/NI (=)
Public Services and Facilities	LTS/NI	LTS/NI (-)	LTS/NI (-)	LTS/NI (-)	LTS/NI (=)
Public Utilities	LTS/NI	LTS/NI (-)	LTS/NI (-)	LTS/NI (-)	LTS/NI (-)
Tribal Cultural Resources	LTS/NI	LTS/NI (-)	LTS/NI (=)	LTS/NI (=)	LTS/NI (=)
Visual Effect and Neighborhood Character	SU	LTS/NI (-)	LTS/NI (-)	LTS/NI (-)	LTS/NI (-)
Water Quality	LTS/NI	LTS/NI (-)	LTS/NI (=)	LTS/NI (=)	LTS/NI (=)
Wildfire	LTS/NI	LTS/NI (-)	LTS/NI (=)	LTS/NI (=)	LTS/NI (=)
Meets Most of the Basic Project Objectives?	**Yes**	**No**	**Yes**	**Yes**	**Yes**

Note: SU = significant unavoidable; SM = significant mitigated; LTS/NI = less than significant/no impact; = represents a similar impact; - represents a reduced impact.

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CHAPTER 10 MITIGATION MONITORING AND REPORTING PROGRAM

California Environmental Quality Act (CEQA) Section 21081.6 requires that a mitigation monitoring and reporting program (MMRP) be established upon certification of an environmental impact report (EIR). It stipulates that "the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation."

This MMRP has been developed in compliance with California Public Resources Code (PRC) Section 21081.6 and Section 15097 of the CEQA Guidelines and identifies (1) mitigation measures to be implemented prior to, during, and after construction of the project; (2) the individual/agency responsible for that implementation; and (3) criteria for completion or monitoring of the specific measures. This MMRP applies to the proposed Renzulli Estates Project (project).

10.1 GENERAL

Part I – Plan Check Phase (prior to permit issuance)

1. Prior to the issuance of a Notice to Proceed for construction permit, such as Demolition, Grading, or Building, or beginning any construction-related activity on site, the Development Services Department Environmental Designee shall review and approve Construction Documents (plans, specification, details, etc.) to ensure the MMRP requirements are incorporated into the design.
2. In addition, the Environmental Designee 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**."

   These notes must be shown within the first three sheets of the construction documents in the format specified for engineering construction document templates as shown on the City of San Diego (City) website: https://www.sandiego.gov/development-services/forms-publications/design-guidelines-templates.
3. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.
4. **SURETY AND COST RECOVERY –** The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

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 for arranging and performing 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:

   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, it is also required to call **RE** and **MMC** at **858.627.3360**

2. **MMRP COMPLIANCE:** This project, PRJ-0674401, and/or Environmental Document (SCH No. 2022040125) shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the Development Services Department's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (e.g., to explain when and how compliance is being met and location of verifying proof). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (e.g., specific locations, times of monitoring, methodology).

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

3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within 1 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:

   a. Incidental Take Permit

   b. Department of Toxic Substances Control Site Cleanup Program

4. **MONITORING EXHIBITS** All consultants are required to submit to RE and MMC a monitoring exhibit on an 11 × 17 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 Development Services Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

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

Document Submittal/Inspection Checklist

Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to preconstruction meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at preconstruction meeting
Transportation	Active Transportation In-Lieu Fee Payment	Prior to issuance of building permit
Air Quality	Contractor Letter	Prior to the start of construction activities and issuance of grading permits, contractor letter demonstrating Tier 4 Interim engines or better will be utilized
Biology	Upland Restoration Plan, Long-Term Management Plan, and Revegetation Construction Plan	Prior to issuance of a Notice to Proceed or first grading permit
Biology	Grading Plan	Crotch's bumble bee pre-activity survey if activity is to start between April 1 and August 31. Avoidance measures if determined appropriate per the Qualified Biologist and California Department of Fish and Wildlife. Cooper's hawk pre-activity survey if activity is to start between February 1 and September 15. California gnatcatcher pre-activity survey if activity is to start between March 1 and August 15. Avoidance measures if determined appropriate per the Qualified Biologist.

Document Submittal/Inspection Checklist

Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
Biology	Results of the preconstruction survey	Prior to issuance of any construction permits, including, but not limited to, the first grading permit, demolition plans/permits and building plans/permits, or a Notice to Proceed for Subdivisions
Greenhouse Gas	Building Plan	Prior to issuance of building permit
Greenhouse Gas	Landscape Plan	Prior to issuance of building permit
Noise	Construction Noise Management Plan	Monitoring of noise compliance measure(s)

10.2 SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

10.2.1 TRANSPORTATION

The following mitigation measure (MM) shall be implemented to reduce significant transportation vehicle miles traveled impacts:

MM-TRA-1: Prior to final inspection of any buildings, the Owner/Permittee shall pay the required Active Transportation In-Lieu Fee in accordance with the Mobility Choices Regulations (San Diego Municipal Code Chapter 14, Article 3, Division 11), Appendix T Mobility Choices Regulations: Implementation Guidelines, which is required of projects located within Mobility Zone 4 under the Complete Communities: Mobility Zone 4 under Complete Communities: Mobility Choices program and ordinance.

10.2.2 AIR QUALITY

The following mitigation shall be implemented to reduce potential criteria air pollutants to below a level of significance:

MM-AQ-1: Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Permits, and Building Permits, or a Notice to Proceed for Subdivisions by the City of San Diego (City), the Owner/Permittee shall ensure via a written letter provided to the City Mitigation Monitoring Coordinator that all 75-horsepower or greater diesel-powered equipment is powered with California Air Resources Board–certified Tier 4 Interim engines or better. Should Tier IV equipment not be available or possible, the applicant may submit a request to the Development Services Department Environmental Analysis Section to apply an

equivalent method of achieving project-generated construction emissions that fall below the numeric California Environmental Quality Act (CEQA) cancer risk standard. Documentation using industry-standard emission estimation methodologies shall be furnished to the City demonstrating that estimated project-generated construction emissions would not exceed the applicable CEQA cancer risk threshold with the alternate construction method(s). If the documentation demonstrates that project-generated construction emissions will remain below the applicable cancer risk threshold, then the City Development Services Department Environmental Analysis Section may approve the alternate construction method(s) at their discretion. Required construction equipment fleet and methodologies approved by the City shall be included in the contract specifications for the applicant's construction contractor.

10.2.3 BIOLOGICAL RESOURCES

The following mitigation shall be implemented to reduce potential indirect impacts to special-status wildlife species to below a level of significance:

MM-BIO-1 **Upland Mitigation.** Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Permits, and Building Permits by the City of San Diego (City), the Owner/Permittee shall mitigate for the loss of 1.35 acres of Tier I habitat, 9.90 acres of Tier II habitat, and 6.35 acres of Tier IIIA habitat by providing a minimum of 1.65 acres of Tier I habitat, 9.90 acres of Tier II habitat, and 4.88 acres of Tier IIIA habitat mitigation, through a combination of on-site preservation and on-site revegetation (i.e., creation, restoration, and enhancement).

On-Site Preservation. The Owner/Permittee shall preserve 7.97 acres within the Multi-Habitat Planning Area (MHPA) that support 1.11 acres of Tier I habitat, 1.23 acres of Tier II habitat, and 5.63 acres of Tier IIIA habitat. The on-site preserved habitat provided to satisfy upland mitigation requirements shall be dedicated to the City with a maintenance endowment and managed in perpetuity by the City as part of the MHPA preserve system.

On-Site Creation, Restoration, and Enhancement. Prior to the issuance of any construction permits, including but not limited to the first Grading Permit, Demolition Permit, and Building Permit, the Assistant Deputy Director (ADD) environmental designee of the City's Land Development Review Division (LDR) shall verify that the following statement is shown on the grading and/or construction plans as a note under the heading Environmental Requirements: "Renzulli Estates

Project is subject to the Mitigation Monitoring and Reporting Program (MMRP) and shall conform to the mitigation conditions as contained in the Environmental Impact Report PRJ-0674401 / State Clearinghouse No. 2022040125."

Prior to Permit Issuance

A. Land Development Review (LDR) Plan Check

1. Prior to the issuance of any construction permits, including but not limited to the first Grading Permit, Demolition Permit, and Building Permit, whichever is applicable, the ADD environmental designee shall verify that the requirements for the revegetation/restoration plans and specifications, including 4.57 acres of creation and restoration of coastal sage scrub (Tier II), 0.54 acres of scrub oak chaparral (Tier I) restoration, 4.51 acres of coastal sage scrub/chaparral (Tier II) restoration, 0.52 acres of southern mixed chaparral (Tier IIIA) restoration, and 0.11 acres of southern mixed chaparral (Tier IIIA) enhancement. The restoration, creation, and enhancement shall be shown and noted on the appropriate landscape construction documents. The landscape construction documents and specifications must be found to be in conformance with the On-site Upland Restoration Plan prepared by Dudek May 2025, the requirements of which are summarized below:

B. Restoration Plan(s) and Specifications

1. Landscape Construction Documents (LCDs) shall be prepared on D-sheets and submitted to the City of San Diego Development Services Department, Landscape Architecture Section (LAS) for review and approval. LAS shall consult with Mitigation Monitoring Coordination (MMC) and obtain concurrence prior to approval of LCD. The LCD shall consist of revegetation/restoration, planting, irrigation, and erosion control plans; including all required graphics, notes, details, specifications, letters, and reports as outlined below.
2. Landscape Revegetation/Restoration Planting and Irrigation Plans shall be prepared in accordance with the City's Land Development Code (LDC) Chapter 14, Article 2, Division 4, the LDC Landscape Standards submittal requirements, and Attachment B (General Outline for Revegetation/Restoration Plans) of the City Biology Guidelines. The Principal Qualified Biologist (PQB) shall identify and adequately document all pertinent information concerning the revegetation/restoration goals, such as but not limited to, plant/seed

palettes, the timing of installation, plant installation specifications, method of watering, protection of adjacent habitat, erosion and sediment control, performance/success criteria, inspection schedule by City staff, document submittals, reporting schedule, etc. The LCD shall also include comprehensive graphics and notes addressing the ongoing maintenance requirements (after final acceptance by the City).

3. The Revegetation Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Construction Manager (CM), and Grading Contractor (GC), where applicable, shall be responsible for ensuring that all grading and contouring, clearing and grubbing, installation of plant materials, and any necessary maintenance activities or remedial actions required during installation and the 120-day plant establishment period are completed per approved LCD. The following procedures, at a minimum, but not limited to, shall be performed:
    a. The RMC shall be responsible for the maintenance of the upland mitigation area for a minimum period of 120 days. Maintenance visits shall be conducted on a minimum monthly basis throughout the plant establishment period.
    b. At the end of the 120-day period, the PQB shall review the mitigation area to assess the completion of the short-term plant establishment period and shall submit a report for approval by MMC.
    c. MMC will provide approval in writing to begin the 5-year long-term establishment/maintenance and monitoring program.
    d. Existing indigenous/native species shall not be pruned, thinned, or cleared in the revegetation/mitigation area.
    e. The revegetation site shall not be fertilized.
    f. The RIC is responsible for reseeding (if applicable) if weeds are not removed, within 1 week of written recommendation by the PQB.
    g. Weed control measures shall include the following: (1) hand removal, (2) cutting with power equipment, and (3) chemical control. Hand removal of weeds is the most desirable method of control and shall be used wherever possible.
    h. Damaged areas shall be repaired immediately by the RIC/RMC. Insect infestations, plant diseases, herbivory, and other pest problems shall be closely monitored throughout the 5-year maintenance period. Protective mechanisms such

as metal wire netting shall be used as necessary. Diseased and infected plants shall be immediately disposed of off site in a legally acceptable manner at the discretion of the PQB or Qualified Biological Monitor (QBM) (City approved). Where possible, biological controls shall be used instead of pesticides and herbicides.

4. If a brush management program is required, the revegetation/restoration plan shall show the dimensions of each brush management zone. Notes shall be provided describing the restrictions on planting and maintenance and identifying that the area is impact neutral and shall not be used for habitat mitigation/credit purposes.

C. Letters of Qualification Have Been Submitted to ADD

1. The applicant shall submit, for approval, a letter verifying the qualifications of the biological professional to MMC. This letter shall identify the PQB, Principal Restoration Specialist (PRS), and QBM, where applicable, and the names of all other persons involved in the implementation of the revegetation/restoration plan and biological monitoring program, as they are defined in the City Biological Review References. Resumes and the biology worksheet should be updated annually.
2. MMC will provide the applicant with documentation confirming the qualifications of the PQB/PRS/QBM and all City-approved persons involved in the revegetation/restoration plan and biological monitoring of the project.
3. Prior to the start of work, the applicant must obtain approval from MMC for any personnel changes associated with the revegetation/restoration plan and biological monitoring of the project.
4 PQB must also submit evidence to MMC that the PQB/QBM has completed Storm
Water Pollution Prevention Program (SWPPP) training.

Prior to Start of Construction

A. PQB/PRS Shall Attend Pre-Construction (Precon) Meetings

1. Prior to beginning any work that requires monitoring:
   a. The Owner/Permittee or their authorized representative shall arrange a Precon Meeting that shall include the PQB or PRS,

Construction Manager (CM) and/or Grading Contractor (GC), Landscape Architect (LA), Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC.

b. The PQB shall also attend any other grading/excavation-related Precon Meetings to make comments and/or suggestions concerning the revegetation/restoration plan(s) and specifications with the RIC, CM, and/or GC.

c. If the PQB is unable to attend the Precon Meeting, the Owner shall schedule a focused Precon Meeting with MMC, PQB/PRS, CM, BI, LA, RIC, RMC, RE and/or BI, if appropriate, prior to the start of any work associated with the revegetation/ restoration phase of the project, including site grading preparation.

2. Where Revegetation/Restoration Work Will Occur

a. Prior to the start of any work, the PQB/PRS shall also submit a revegetation/restoration monitoring exhibit (RRME) based on the appropriate reduced LCD (reduced to 11" × 17" format) to MMC and the RE, identifying the areas to be revegetated/restored, including the delineation of the limits of any disturbance/grading and any excavation.

b. PQB shall coordinate with the construction superintendent to identify appropriate best management practices (BMPs) on the RRME.

3. When Biological Monitoring Will Occur

a. Prior to the start of any work, the PQB/PRS shall also submit a monitoring procedures schedule to MMC and the RE indicating when and where biological monitoring and related activities will occur.

4. PQB Shall Contact MMC to Request Modification

a. The PQB may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the revegetation/restoration plans and specifications. This request shall be based on relevant information (such as other sensitive species not listed by federal and/or state agencies and/or not covered by the MSCP and to which any impacts may be considered significant under CEQA) which may reduce or increase the potential for biological resources to be present.

During Construction

A. PQB or QBM Present During Construction/Grading/Planting

1. The PQB or QBM shall be present full-time during construction activities including but not limited to, site preparation, clearing, grading, excavation, landscape establishment in association with on-site native habitat revegetation activity which could result in impacts to sensitive biological resources as identified in the LCD and on the RRME. The RIC and/or QBM are responsible for notifying the PQB/PRS of changes to any approved construction plans, procedures, and/or activities. The PQB/PRS is responsible for notifying the CM, LA, RE, BI, and MMC of the changes.
2. The PQB or QBM shall document field activity via the Consultant Site Visit Record Forms (CSVR). The CM shall provide the CSVRs on the first day of monitoring, the last day of monitoring, monthly, and in the event of a deviation from conditions identified within the LCD and/or biological monitoring program. The RE shall forward copies to MMC.
3. The PQB or QBM shall be responsible for maintaining and submitting the CSVR at the time that CM responsibilities end (i.e., upon the completion of construction activity other than that associated with biology).
4. All construction activities (including staging areas) shall be restricted to the development areas as shown on the LCD. The PQB/PRS or QBM staff shall monitor construction activities as needed, with MMC concurrence on method and schedule. This is to ensure that construction activities do not encroach into biologically sensitive areas beyond the limits of disturbance as shown on the approved LCD.
5. The PQB or QBM shall supervise the placement of orange construction fencing or City approved equivalent, along the limits of potential disturbance adjacent to (or at the edge of) all sensitive habitats (coastal sage scrub [Tier II], scrub oak chaparral [Tier I], and southern mixed chaparral [Tier IIIA]), as shown on the approved LCD.
6. The PQB shall provide a letter to MMC that limits of potential disturbance have been surveyed and staked, and that the construction fencing is installed properly.
7. The PQB or QBM shall oversee the implementation of BMPs, such as gravel bags, straw logs, silt fences, or equivalent erosion control measures, as needed to ensure the prevention of any significant sediment transport. In addition, the PQB/QBM shall be responsible

for verifying the removal of all temporary construction BMPs upon completion of construction activities. Removal of temporary construction BMPs shall be verified in writing on the final construction phase CSVR.

8. PQB shall verify in writing on the CSVR's that no trash stockpiling or oil dumping, fueling of equipment, storage of hazardous wastes or construction equipment/material, parking, or other construction-related activities shall occur adjacent to sensitive habitat. These activities shall occur only within the designated staging area located outside the area defined as a biologically sensitive area.
9. The long-term establishment inspection and reporting schedule per LCD must all be approved by MMC prior to the issuance of the Notice of Completion (NOC) or any bond release .

B. Disturbance/Discovery Notification Process

1. If unauthorized disturbances occur or sensitive biological resources are discovered that were not previously identified on the LCD and/or RRME, the PQB or QBM shall direct the contractor to divert construction in the area of disturbance or discovery temporarily and immediately notify the RE or BI, as appropriate.
2. The PQB shall also immediately notify MMC by telephone of the disturbance, report the nature and extent of the disturbance, and recommend the method of additional protection, such as fencing and appropriate Best Management Practices (BMPs). After obtaining concurrence with MMC and the RE, PQB and CM shall install the approved protection and agreement on BMP's.
3. The PQB shall also submit written documentation of the disturbance to MMC within 24 hours by email with photos of the resource in context (e.g., showing adjacent vegetation).

C. Determination of Significance

1. The PQB shall evaluate the significance of disturbance and/or discovered biological resource and provide a detailed analysis and recommendation in a letter report with the appropriate photo documentation to MMC to obtain concurrence and formulate a plan of action which can include fines, fees, and supplemental mitigation costs.
2. MMC shall review this letter report and provide the RE with MMC's recommendations and procedures .

Post-Construction

A. Mitigation Monitoring and Reporting Period

1. Five-Year Mitigation Establishment/Maintenance Period

a. The RMC shall be retained to complete maintenance monitoring activities throughout the five-year mitigation monitoring period.

b. Maintenance visits will be conducted monthly for the first 3 years, quarterly from July to December in the second and third years, and quarterly thereafter.

c Maintenance activities will include all items described in the LCD.

d. Plant replacement will be conducted as recommended by the PQB (note: plants shall be increased in container size relative to the time of initial installation or establishment or maintenance period may be extended to the satisfaction of MMC).

2. Five-Year Biological Monitoring

a. All biological monitoring and reporting shall be conducted by a PQB or QBM, as appropriate, consistent with the LCD.

b. Monitoring shall involve both qualitative horticultural monitoring and quantitative monitoring (i.e., performance/success criteria). Horticultural monitoring shall focus on soil conditions (e.g., moisture) and fertility, container plant health, seed germination rates, presence of native and non-native (e.g., invasive exotic) species, any significant disease or pest problems, irrigation repair and scheduling, trash removal, illegal trespass, and any erosion problems.

c. After plant installation is complete, qualitative monitoring surveys will occur monthly for the first year, monthly from January to June of the second and third years, quarterly from July to December in the second and third years, and quarterly thereafter.

d. Upon the completion of the 120-day short-term plant establishment period, quantitative monitoring surveys shall be conducted at 12, 24, 36, 48, and 60 months by the PQB or QBM. The revegetation/restoration effort shall be quantitatively evaluated once per year (in spring) during years one through five, to determine compliance with the performance standards identified on the LCD. All plant

material must have survived without supplemental irrigation for the last two years.

e. Quantitative monitoring shall include the use of fixed transects and photo points to determine the vegetative cover within the revegetated habitat. Collection of fixed transect data within the revegetation/restoration site shall result in the calculation of native species richness, percent cover, relative to the reference site, of target vegetation, and percent total cover of non-native/noninvasive vegetation. Container plants will also be counted to determine percent survivorship. The data will be used to determine the attainment of performance/success criteria identified within the LCD.

f. The biological monitoring requirements may be reduced if the revegetation meets the fifth-year criteria before the end of the fifth year and the irrigation has been terminated for the last two years.

g. The PQB or QBM shall oversee the implementation of post-construction BMPs, such as gravel bags, straw logs, silt fences, or equivalent erosion control measures, as needed to ensure the prevention of any significant sediment transport. In addition, the PQB/QBM shall be responsible for verifying the removal of all temporary post-construction BMPs upon completion of construction activities. Removal of temporary post-construction BMPs shall be verified in writing on the final post-construction phase CSVR.

B. Submittal of Draft Monitoring Report

1. A draft monitoring letter report shall be prepared to document the completion of the 120-day plant establishment period. The report shall include a discussion of weed control, horticultural treatments (pruning, mulching, and disease control), erosion control, trash/debris removal, replacement planting/reseeding, site protection/signage, pest management, vandalism, and irrigation maintenance. The revegetation/restoration effort shall be visually assessed at the end of the 120-day period to determine individual mortality.

2. The PQB shall submit two copies of the Draft Monitoring Report which describes the results, analysis, and conclusions of all phases of the Biological Monitoring and Reporting Program (with appropriate

graphics) to MMC for review and approval within 30 days following the completion of monitoring. Monitoring reports shall be prepared on an annual basis for a period of five years. Site progress reports shall be prepared by the PQB following each site visit and provided to the Owner, RMC, and RIC. Site progress reports shall review maintenance activities (qualitatively and quantitatively when appropriate), monitoring results including progress of the revegetation relative to the performance/success criteria, and the need for any remedial measures.

3. Draft annual reports (three copies) summarizing the results of each progress report, including quantitative monitoring results and photographs taken from permanent viewpoints, shall be submitted to MMC for review and approval within 30 days following the completion of monitoring.
4. MMC shall return the Draft Monitoring Report to the PQB for revision or, for preparation of each report.
5. The PQB shall submit a revised Monitoring Report to MMC (with a copy to RE) for approval within 30 days.
6. MMC will provide written acceptance of the PQB and RE of the approved report .

C. Final Monitoring Reports(s)

1. PQB shall prepare a Final Monitoring upon achievement of the fifth-year performance/success criteria and completion of the five-year maintenance period.
    a. This report may be issued before the end of the fifth year if the revegetation meets the fifth-year performance /success criteria and the irrigation has been terminated for the last two years.
    b. The Final Monitoring report shall be submitted to MMC for evaluation of the success of the mitigation effort and final acceptance. At this time, a request for a pre-final inspection shall be submitted; MMC will schedule after reviewing the report.
    c. If at the end of the five years, any of the revegetated areas fails to meet the project's final success standards, the applicant must consult with MMC. This consultation shall take place to determine whether the revegetation effort is acceptable. The applicant understands that failure of any significant portion of the revegetation/restoration area may

result in a requirement to replace or renegotiate that portion of the site and/or extend the monitoring and establishment/maintenance period until all success standards are met .

MM-BIO-2 **On-Site Sensitive Plant Mitigation.** Prior to the issuance of any construction permits, including but not limited to the first Grading Permit, Demolition Permit, and Building Permit, the Assistant Deputy Director (ADD) environmental designee of the City's Land Development Review Division (LDR) shall verify that the following statement is shown on the grading and/or construction plans as a note under the heading Environmental Requirements: "Renzulli Estates Project is subject to the Mitigation Monitoring and Reporting Program (MMRP) and shall conform to the mitigation conditions as contained in the Environmental Impact Report PRJ-0674401/State Clearinghouse No. 2022040125."

Prior to Permit Issuance

A. Land Development Review (LDR) Plan Check

1. Prior to the issuance of any construction permits, including but not limited to the first Grading Permit, Demolition Permit, and Building Permit, whichever is applicable, the ADD environmental designee shall verify that the requirements for sensitive plant species restoration, specifically a minimum survivorship of a minimum of 26 Del Mar manzanita individuals (cuttings from impacted individuals to be propagated and used in on-site restoration), a minimum survivorship of 520 Nuttall's scrub oak (cuttings from impacted individuals to be propagated and used in on-site restoration), and a minimum survivorship of 92 barrel cactus (impacted individuals to be salvaged and translocated in on-site restoration), shall be shown and noted on the appropriate landscape construction documents. The landscape construction documents and specifications must be found to be in conformance with the On-site Upland Restoration Plan prepared by Dudek May 2025, the requirements of which are summarized below:

B. Revegetation/Restoration Plan(s) and Specifications

1. Landscape Construction Documents (LCD) shall be prepared on D-sheets and submitted to the City of San Diego Development Services Department, Landscape Architecture Section (LAS) for review and approval. LAS shall consult with Mitigation Monitoring Coordination (MMC) and obtain concurrence prior to approval of LCD. The LCD shall consist of revegetation/restoration, planting, irrigation, and erosion control plans;

including all required graphics, notes, details, specifications, letters, and reports as outlined below.

2. Landscape Revegetation/Restoration Planting and Irrigation Plans shall be prepared in accordance with the City's Land Development Code (LDC) Chapter 14, Article 2, Division 4, the LDC Landscape Standards submittal requirements, and Attachment "B" (General Outline for Revegetation/Restoration Plans) of the City Biology Guidelines. The Principal Qualified Biologist (PQB) shall identify and adequately document all pertinent information concerning the revegetation/restoration goals and, such as but not limited to, plant/seed palettes, the timing of installation, plant installation specifications, method of watering, protection of adjacent habitat, erosion, and sediment control, performance/success criteria, inspection schedule by City staff, document submittals, reporting schedule, etc. The LCD shall also include comprehensive graphics and notes addressing the ongoing maintenance requirements (after final acceptance by the City).
3. The Revegetation Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Construction Manager (CM) and Grading Contractor (GC), where applicable shall be responsible for ensuring that all grading and contouring, clearing, and grubbing, installation of plant materials, and any necessary maintenance activities or remedial actions required during installation and the 120-day plant establishment period are done per approved LCD. The following procedures at a minimum, but not limited to, shall be performed:
    a. The RMC shall be responsible for the maintenance of the sensitive plant restoration areas for a minimum period of 120 days. Maintenance visits shall be conducted on a minimum monthly basis throughout the plant establishment period.
    b. At the end of the 120-day period, the PQB shall review the mitigation area to assess the completion of the short-term plant establishment period and submit a report for approval by MMC.
    c. MMC will provide approval in writing to begin the five-year long-term establishment/maintenance and monitoring program.
    d. Existing indigenous/native species shall not be pruned, thinned, or cleared in the revegetation/mitigation area.
    e. The revegetation site shall not be fertilized.
    f. The RIC is responsible for reseeding (if applicable) if weeds are not removed, within one week of written recommendation by the PQB.

g. Weed control measures shall include the following: (1) hand removal, (2) cutting, with power equipment, and (3) chemical control. Hand removal of weeds is the most desirable method of control and will be used wherever possible.

h. Damaged areas shall be repaired immediately by the RIC/RMC. Insect infestations, plant diseases, herbivory, and other pest problems will be closely monitored throughout the five-year maintenance period. Protective mechanisms such as metal wire netting shall be used as necessary. Diseased and infected plants shall be immediately disposed of off-site in a legally acceptable manner at the discretion of the PQB or Qualified Biological Monitor (QBM) (City approved). Where possible, biological controls will be used instead of pesticides and herbicides.

4. If a Brush Management Program is required the revegetation/restoration plan shall show the dimensions of each brush management zone. Notes shall be provided describing the restrictions on planting and maintenance and identify that the area is impact neutral and shall not be used for habitat mitigation/credit purposes.

C. Letters of Qualification Have Been Submitted to ADD

1. The applicant shall submit, for approval, a letter verifying the qualifications of the biological professional to MMC. This letter shall identify the PQB, Principal Restoration Specialist (PRS), and QBM, where applicable, and the names of all other persons involved in the implementation of the revegetation/restoration plan and biological monitoring program, as they are defined in the City Biological Review References. Resumes and the biology worksheet should be updated annually.
2. MMC will provide the applicant with documentation confirming the qualifications of the PQB/PRS/QBM and all city-approved persons involved in the revegetation/restoration plan and biological monitoring of the project.
3. Prior to the start of work, the applicant must obtain approval from MMC for any personnel changes associated with the revegetation/restoration plan and biological monitoring of the project.
4. PQB must also submit evidence to MMC that the PQB/QBM has completed Storm Water Pollution Prevention Program (SWPPP) training.

Prior to Start of Construction

A. PQB/PRS Shall Attend Pre-Construction (Precon) Meetings

1. Prior to beginning any work that requires monitoring:

a. The Owner/Permittee or their authorized representative shall arrange a Precon Meeting that shall include the PQB or PRS, Construction Manager (CM) and/or Grading Contractor (GC), Landscape Architect (LA), Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC.

b. The PQB shall also attend any other grading/excavation-related Precon Meetings to make comments and/or suggestions concerning the revegetation/restoration plan(s) and specifications with the RIC, CM, and/or GC.

c. If the PQB is unable to attend the Precon Meeting, the Owner shall schedule a focused Precon Meeting with MMC, PQB/PRS, CM, BI, LA, RIC, RMC, RE and/or BI, if appropriate, prior to the start of any work associated with the revegetation/ restoration phase of the project, including site grading preparation.

2. Where Revegetation/Restoration Work Will Occur

a. Prior to the start of any work, the PQB/PRS shall also submit a revegetation/restoration monitoring exhibit (RRME) based on the appropriate reduced LCD (reduced to 11"x 17" format) to MMC, and the RE, identifying the areas to be revegetated/restored including the delineation of the limits of any disturbance/grading and any excavation.

b. PQB shall coordinate with the construction superintendent to identify appropriate Best Management Practices (BMP's) on the RRME.

3. When Biological Monitoring Will Occur

a. Prior to the start of any work, the PQB/PRS shall also submit a monitoring procedures schedule to MMC and the RE indicating when and where biological monitoring and related activities will occur.

4. PQB Shall Contact MMC to Request Modification

a. The PQB may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the revegetation/restoration plans and specifications. This request shall be based on relevant information (such as other sensitive species not listed by federal and/or state agencies and/or not covered by the MSCP and to which any impacts may be considered significant under CEQA) which may reduce or increase the potential for biological resources to be present.

During Construction

A. PQB or QBM Present During Construction/Grading/Planting

1. The PQB or QBM shall be present full-time during construction activities including but not limited to, site preparation, clearing, grading, excavation, landscape establishment in association with sensitive plant restoration activity which could result in impacts to sensitive biological resources as identified in the LCD and on the RRME. The RIC and/or QBM are responsible for notifying the PQB/PRS of changes to any approved construction plans, procedures, and/or activities. The PQB/PRS is responsible for notifying the CM, LA, RE, BI, and MMC of the changes.
2. The PQB or QBM shall document field activity via the Consultant Site Visit Record Forms (CSVR). The CM shall provide the CSVRs on the first day of monitoring, the last day of monitoring, monthly, and in the event of a deviation from conditions identified within the LCD and/or biological monitoring program. The RE shall forward copies to MMC.
3. The PQB or QBM shall be responsible for maintaining and submitting the CSVR at the time that CM responsibilities end (i.e., upon the completion of construction activity other than that associated with biology).
4. All construction activities (including staging areas) shall be restricted to the development areas as shown on the LCD. The PQB/PRS or QBM staff shall monitor construction activities as needed, with MMC concurrence on method and schedule. This is to ensure that construction activities do not encroach into biologically sensitive areas beyond the limits of disturbance as shown on the approved LCD.
5. The PQB or QBM shall supervise the placement of orange construction fencing or City approved equivalent, along the limits of potential disturbance adjacent to (or at the edge of) all sensitive habitats (coastal sage scrub [Tier II], scrub oak chaparral [Tier I], and southern mixed chaparral [Tier IIIA]) as shown on the approved LCD.
6. The PQB shall provide a letter to MMC that limits of potential disturbance have been surveyed and staked, and that the construction fencing is installed properly.
7. The PQB or QBM shall oversee the implementation of BMPs, such as gravel bags, straw logs, silt fences, or equivalent erosion control measures, as needed to ensure the prevention of any significant sediment transport. In addition, the PQB/QBM shall be responsible for verifying the removal of all temporary construction BMPs upon completion of construction activities.

Removal of temporary construction BMPs shall be verified in writing on the final construction phase CSVR.

8 PQB shall verify in writing on the CSVR's that no trash stockpiling or oil dumping, fueling of equipment, storage of hazardous wastes or construction equipment/material, parking, or other construction-related activities shall occur adjacent to sensitive habitat. These activities shall occur only within the designated staging area located outside the area defined as a biologically sensitive area.

9. The long-term establishment inspection and reporting schedule per LCD must all be approved by MMC prior to the issuance of the Notice of Completion (NOC) or any bond release.

B. Disturbance/Discovery Notification Process

1. If unauthorized disturbances occur or sensitive biological resources are discovered that were not previously identified on the LCD and/or RRME, the PQB or QBM shall direct the contractor to divert construction in the area of disturbance or discovery temporarily and immediately notify the RE or BI, as appropriate.
2. The PQB shall also immediately notify MMC by telephone of the disturbance, report the nature and extent of the disturbance, and recommend the method of additional protection, such as fencing and appropriate Best Management Practices (BMPs). After obtaining concurrence with MMC and the RE, PQB and CM shall install the approved protection and agreement on BMP's.
3. The PQB shall also submit written documentation of the disturbance to MMC within 24 hours by email with photos of the resource in context (e.g., showing adjacent vegetation).

C. Determination of Significance

1. The PQB shall evaluate the significance of disturbance and/or discovered biological resource and provide a detailed analysis and recommendation in a letter report with the appropriate photo documentation to MMC to obtain concurrence and formulate a plan of action which can include fines, fees, and supplemental mitigation costs.
2. MMC shall review this letter report and provide the RE with MMC's recommendations and procedures.

Post-Construction

A. Mitigation Monitoring and Reporting Period

1. Five-Year Mitigation Establishment/Maintenance Period

a. The RMC shall be retained to complete maintenance monitoring activities throughout the five-year mitigation monitoring period.
b. Maintenance visits will be conducted monthly for the first year, monthly from January to June of the second and third years, quarterly from July to December in the second and third years, and quarterly thereafter.
c. Maintenance activities will include all items described in the LCD.
d. Plant replacement will be conducted as recommended by the PQB (note: plants shall be increased in container size relative to the time of initial installation or establishment or maintenance period may be extended to the satisfaction of MMC.

2. Five-Year Biological Monitoring
   a. All biological monitoring and reporting shall be conducted by a PQB or QBM, as appropriate, consistent with the LCD.
   b. Monitoring shall involve both qualitative horticultural monitoring and quantitative monitoring (i.e., performance/success criteria). Horticultural monitoring shall focus on soil conditions (e.g., moisture and fertility), container plant health, seed germination rates, presence of native and non-native (e.g., invasive exotic) species, any significant disease or pest problems, irrigation repair and scheduling, trash removal, illegal trespass, and any erosion problems.
   c. After plant installation is complete, qualitative monitoring surveys will occur monthly for the first 3 years, quarterly from July to December in the second and third years, and quarterly thereafter.
   d. Upon the completion of the 120-day short-term plant establishment period, quantitative monitoring surveys shall be conducted at 12, 24, 36, 48, and 60 months by the PQB or QBM. The revegetation/restoration effort shall be quantitatively evaluated once per year (in spring) during years one through five, to determine compliance with the performance standards identified on the LCD. All plant material must have survived without supplemental irrigation for the last two years.
   e. Quantitative monitoring shall include counts of Del Mar manzanita, Nuttall's scrub oak and barrel cactus survivorship. The data will be used to determine the attainment of performance/success criteria identified within the LCD.

f. The biological monitoring requirements may be reduced if the revegetation meets the fifth-year criteria before the end of the fifth year and the irrigation has been terminated for the last two years.

g. The PQB or QBM shall oversee the implementation of post-construction BMPs, such as gravel bags, straw logs, silt fences, or equivalent erosion control measures, as needed to ensure the prevention of any significant sediment transport. In addition, the PQB/QBM shall be responsible for verifying the removal of all temporary post-construction BMPs upon completion of construction activities. Removal of temporary post-construction BMPs shall be verified in writing on the final post-construction phase CSVR.

C. Submittal of Draft Monitoring Report

1. A draft monitoring letter report shall be prepared to document the completion of the 120-day plant establishment period. The report shall include a discussion of weed control, horticultural treatments (pruning, mulching, and disease control), erosion control, trash/debris removal, replacement planting/reseeding, site protection/signage, pest management, vandalism, and irrigation maintenance. The revegetation/restoration effort shall be visually assessed at the end of the 120-day period to determine individual mortality.
2. The PQB shall submit two copies of the Draft Monitoring Report which describes the results, analysis, and conclusions of all phases of the Biological Monitoring and Reporting Program (with appropriate graphics) to MMC for review and approval within 30 days following the completion of monitoring. Monitoring reports shall be prepared on an annual basis for a period of five years. Site progress reports shall be prepared by the PQB following each site visit and provided to the Owner, RMC, and RIC. Site progress reports shall review maintenance activities (qualitatively and quantitatively when appropriate), monitoring results including progress of the revegetation relative to the performance/success criteria, and the need for any remedial measures.
3. Draft annual reports (three copies) summarizing the results of each progress report, including quantitative monitoring results and photographs taken from permanent viewpoints, shall be submitted to MMC for review and approval within 30 days following the completion of monitoring.
4. MMC shall return the Draft Monitoring Report to the PQB for revision or, for preparation of each report.
5. The PQB shall submit a revised Monitoring Report to MMC (with a copy to RE) for approval within 30 days.

6. MMC will provide written acceptance of the PQB and RE of the approved report.

D. Final Monitoring Reports(s)

1. PQB shall prepare a Final Monitoring upon achievement of the fifth-year performance/success criteria and completion of the five-year maintenance period.
    a. This report may be issued before the end of the fifth year if the revegetation meets the fifth-year performance /success criteria and the irrigation has been terminated for the last two years.
    b. The Final Monitoring report shall be submitted to MMC for evaluation of the success of the mitigation effort and final acceptance. At this time, a request for a pre-final inspection shall be submitted; MMC will schedule after reviewing the report.

c. If at the end of the five years, any of the revegetated areas fails to meet the project's final success standards, the applicant must consult with MMC. This consultation shall take place to determine whether the revegetation effort is acceptable. The applicant understands that failure of any significant portion of the revegetation/restoration area may result in a requirement to replace or renegotiate that portion of the site and/or extend the monitoring and establishment/maintenance period until all success standards are met.

MM-BIO-3 **Avian Protection Requirements.** Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits, and Building Plans/Permits, or a Notice to Proceed for Subdivisions, removal of habitat that supports active Cooper's hawk nests in the proposed area of disturbance (both on site and within the Wetland Plan area of work) should occur outside of the avian breeding season (February 1 to September 15) or a pre-construction survey shall be completed by a Qualified Biologist to determine the presence or absence of active nesting Cooper's hawk on the proposed area of disturbance or within 300 feet of the area of disturbance. The pre-construction survey shall be conducted within 3 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to City of San Diego DSD for review and written approval prior to initiating any construction activities. If nesting Cooper's hawk are detected, a letter report in conformance with the City of San Diego's Biology Guidelines and applicable state and federal law (i.e., appropriate follow-up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. A minimum 300-foot buffer shall be established from any

nesting Cooper's hawk. The report shall be submitted to the City of San Diego for review and written approval and implemented to the satisfaction of the City of San Diego. The City of San Diego's MMC Section and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction.

MM-BIO-4 Coastal California Gnatcatcher

Prior to the issuance of any Notice to Proceed, or pre-construction meeting, the City Deputy Director (or appointed designee) shall verify that the Multi-Habitat Planning Area (MHPA) boundaries and the following project requirements regarding the coastal California gnatcatcher are shown on the construction plans:

No clearing, grubbing, grading, or other construction activities shall occur within the MHPA between March 1 and August 15, the breeding season of the coastal California gnatcatcher, until the following requirements have been met to the satisfaction of the Deputy Director (or appointed designee):

A. A Qualified Biologist (possessing a valid Endangered Species Act Section 10(a)(1)(a) recovery permit) shall survey those habitat areas within the MHPA that would be subject to construction noise levels exceeding 60 dB(A) hourly average for the presence of the coastal California gnatcatcher. Surveys for the coastal California gnatcatcher shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of any construction. If gnatcatchers are present, then the following conditions must be met:
    i. Between March 1 and August 15, no clearing, grubbing, or grading of occupied gnatcatcher habitat shall be permitted within the MHPA. Areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; and
    ii. Between March 1 and August 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dB(A) hourly average at the edge of occupied gnatcatcher habitat within the MHPA. An analysis showing that noise generated by construction activities would not exceed 60 dB(A) hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing a current noise engineer license or registration with monitoring noise level experience

with listed animal species) and approved by the City representative at least 2 weeks prior to the commencement of construction activities. Prior to the commencement of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; or

iii. At least 2 weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dB(A) hourly average at the edge of habitat occupied by the coastal California gnatcatcher. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring* shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dB(A) hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (August 16).

*Note: Construction noise shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the City representative, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

B. If coastal California gnatcatchers are not detected during the protocol survey, the Qualified Biologist shall submit substantial evidence to the Deputy Director (or appointed designee) and applicable resource agencies that demonstrates whether or not mitigation measures, such as noise walls, are necessary between March 1 and August 15, as follows:

i. If this evidence indicates the potential is high for coastal California gnatcatcher to be present based on historical records or site conditions, then condition A.iii shall be adhered to, as specified above.

ii. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

MM-BIO-5 **Pre-Construction Survey for Crotch's Bumble Bee.** Should this species no longer be a state candidate for listing or state listed threatened or endangered at the time of the pre-construction meeting or protocol surveys are completed and determine the species is absent from the project site, then no avoidance measures shall be required.

Prior to the issuance of a Notice to Proceed (NTP) for construction permits, such as Demolition Grading or Building or beginning and construction-related activity on site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve Construction Documents (CD) (plans, specification, details, etc.) to ensure the applicable MMRP requirements are incorporated into the design:

A) The Owner/Permittee shall obtain an Incidental Take Permit (ITP) from the California Department of Fish and Wildlife (CDFW) prior to the issuance of Grading Permit, Demolition Plans/Permits and Building Plans/Permits. Take of any endangered, threatened, candidate species that results from the project is prohibited, except as authorized by State law (California Fish and Game Code §§ 86, 2062, 2067, 2068, 2080, 2085; California Code of Regulations, Title 14, §786.9) under the CESA.

B) To avoid impacts on Crotch's bumble bee, removal of habitat in the proposed area of disturbance must occur outside of the Colony Active Period between April 1 through August 31. If the removal of habitat in the proposed area of disturbance must occur during the Colony Active Period, a Qualified Biologist shall conduct a pre-activity survey to determine the presence or absence of Crotch's bumble bee within the proposed area of disturbance.

C) Surveys must be conducted by a Qualified Biologist meeting the qualifications discussed in the CDFW guidance (i.e., Survey Considerations for California Endangered Species Act [CESA] Candidate Bumble Bee Species, dated June 6, 2023).

D) The pre-activity survey shall consist of photographic surveys following CDFW guidance (i.e., Survey Considerations for CESA Candidate Bumble Bee Species, dated June 6, 2023). In coordination with CDFW, the Qualified Biologist may be required to send all photo vouchers to a CDFW-approved taxonomist to confirm the identifications of the bumble bees encountered during surveys.

The surveys shall consist of passive methods unless a Memorandum of Understanding is obtained from CDFW. If additional activities (e.g., capture or handling) are deemed necessary to identify bumble bees of an unknown species that may be Crotch's bumble bee then the Qualified Biologist shall obtain the required authorization via a Memorandum of Understanding or Scientific Collecting Permit pursuant to CDFW Survey Considerations for CESA Candidate Bumble Bee Species (CDFW 2023). Survey methods that involve lethal take of species are not acceptable. Survey results will be considered valid until the start of the next colony active period.

E) If pre-activity surveys identify Crotch's bumble bee individuals on site, the Qualified Biologist shall notify and consult with CDFW to establish, monitor, and maintain no-work buffers around the associated floral resources or nest, as appropriate. The size and configuration of the no-work buffer shall be based on the best professional judgment of the Qualified Biologist in consultation with CDFW. Construction activities shall not occur within the no-work buffers until the bees appear no longer active (i.e., associated floral resources appear desiccated and no bees are seen flying for three consecutive days indicating dispersal from the area).

F) Survey data shall be submitted by the Qualified Biologist to the California Natural Diversity Database (CNDDB) in accordance with the Memorandum of Understanding with CDFW, or Scientific Collecting Permit requirements, as applicable.

MM-BIO-6 **Jurisdictional Aquatic Resources.** Prior to issuance of land development permits, including clearing, grubbing, grading, and/or construction permits by the City of San Diego that impact jurisdictional waters, the project applicant shall obtain all necessary permits from RWQCB and CDFW (or written verification from these agencies that permits are not required). The applicant shall mitigate direct impacts in accordance with the terms and conditions of all required permits. Areas under the jurisdictional authority of RWQCB and CDFW shall be delineated on all grading plans.

10.2.4 GREENHOUSE GAS EMISSIONS

MM-GHG-1: Prior to the issuance of building permits, the City of San Diego (City) shall verify that the building plans provide street trees. Per Climate Action Plan Consistency Regulation Section (a)(1)(C), shade tree coverage shall be determined by the expected canopy at 10-year maturity and shall be selected in accordance with the City's Land Development Manual and Street Tree Selection Guide. Trees shall be

irrigated, and the number of trees shall meet the requirements of Landscape Regulations in Chapter 14, Article 2, Division 4 of the San Diego Municipal Code.

MM-GHG-2: Prior to the issuance of building permits, the City of San Diego shall verify that the building plans demonstrate the project includes 0.6 bicycle parking spaces per each 3- to 4-bedroom dwelling unit of the multifamily unit, for a total of 8 bicycle parking spaces. 50% of the 8 bicycle parking spaces (4 spaces) shall include outlets for electric charging.

MM-GHG-3: Prior to the issuance of building permits, the City of San Diego (City) shall verify that the building plans demonstrate that the project includes at least 215 trees (536,168 square feet/5,000 square feet × 2 trees), with at least 1 tree on each lot and:

- New trees planted will comply with the Landscape Standards of the City's Land Development Manual and Street Tree Selection Guide.
- Where possible, trees shall be planted in native soils. When native soil planting is prohibited by site conditions, trees shall be provided in planters and pots on structural podiums with an inside dimension of 48 inches.
- Trees shall be irrigated and maintained consistent with Section 142.0403 of the San Diego Municipal Code (SDMC). The number of trees shall not be less than the requirements of the Landscape Regulations in Chapter 14, Article 2, Division 4 of the SDMC.

10.2.5 NOISE

Potential noise impacts would be reduced to below a level of significance through implementation of the following mitigation measure.

MM-NOI-1: Prior to issuance of construction permits, including but not limited to, the first Grading Permit, Demolition Permits, and Building Permits by the City of San Diego (City), the Owner/Permittee shall prepare and submit a Construction Noise Management Plan (CNMP) to the City's Environmental Analysis Section of the Development Services Department for review and approval. Prior to the issuance of a Construction Permit, Construction Plans shall also include a note indicating that compliance with the CNMP is required and that outlines the requirements identified in the CNMP. The CNMP shall be prepared or reviewed by a Qualified Acoustician (defined as having a Bachelor of Science or higher degree from a qualified program in engineering, physics, or architecture offered by an accredited university or college, and 5 years of experience in noise control engineering and construction noise

analysis; or current enrollment as a full Member or Board-certified Member in the Institute of Noise Control Engineering. In addition, a Qualified Acoustician must have demonstrated experience in preparing and implementing construction noise controls, sound abatement, and monitoring plans on construction projects; calculating construction noise levels; and designing and overseeing the implementation of construction noise abatement measures). The CNMP shall include the following:

a. A detailed construction schedule at daily (or weekly, if activities during each day of the week are typical) resolution and correlating to areas or zones of on-site project construction activities and the anticipated equipment types and quantities involved. Information shall include expected hours of actual operation per day for each type of equipment per activity for the buildout phase, and the anticipated concurrent construction activities on site.
b. Review and revision (if needed) of construction noise level estimates based on the current construction schedule and equipment roster per "a." above and reflecting information from the latest project site plan of expected features and work areas, to determine the anticipated need for construction noise level monitoring.
c. Identification of locations to monitor, if established per "b." above, attended by a Qualified Acoustician or another party under its supervision or direction, at which sample outdoor ambient noise levels will be measured and collected over a sufficient sample period and subsequently analyzed (i.e., compared with applicable time-dependent A-weighted decibel [dBA] thresholds) to ascertain compliance with the SDMC 59.5.0404(c) threshold of 75 dBA equivalent sound level (L_{eq}) over a consecutive 12-hour period during daytime hours (7:00 a.m. to 7:00 p.m.). Sampling shall be performed, at a minimum, on the first (or otherwise considered typical construction operations) day of each distinct construction phase (e.g., each of the seven listed phases in the Renzulli Environmental Impact Report (SCH 2022040125) Table 5.11-3).
d. If sample collected noise level data indicates that the 12-hour noise threshold has or will be exceeded, construction work shall be suspended (for the activity or phase of concern) and the Permittee shall implement measures as detailed or specified in the CNMP that will demonstrate compliance with SDMC 59.5.0404(c) threshold, which may include but are not limited to:
    i. Administrative controls (e.g., reduce operating time of equipment and/or prohibit usage of equipment type[s] within certain distances).

ii. Engineering controls (upgrade noise controls, such as install better engine exhaust mufflers).
iii. Install noise abatement on the site boundary fencing (or within, as practical and appropriate) in the form of sound blankets or comparable temporary barriers to occlude construction noise emission between the site (or specific equipment operation as the situation may define) and the noise-sensitive receptor(s) of concern.

The implemented measure(s) shall be reviewed or otherwise inspected and approved by the Qualified Acoustician (or another party under their supervision or direction) prior to the resumption of the construction activity or process that caused the measured noise concern or need for noise mitigation. Noise levels shall be re-measured after the installation of said measures to ascertain post-mitigation compliance with the noise threshold. As needed, this process shall be repeated and refined until noise level compliance is demonstrated and documented. A report of this implemented mitigation and its documented success to provide compliance with the SDMC 59.5.0404(c) threshold would be provided to Mitigation Monitoring Coordination.

e. The Permittee shall make available a telephone hotline posted on an 11x17 sign at the entrance of the construction site so that concerned neighbors in the community may call to report noise complaints. The CNMP shall include a process to investigate these complaints and, if determined to be valid, detail efforts to provide a timely resolution and response to the complainant, with a copy of the resolution provided to the Mitigation Monitoring Coordination.

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12 INDIVIDUALS AND AGENCIES CONSULTED

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LDR Landscaping – Vanessa Kohakura
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MSCP, Dan Monroe

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Plan-Long-Range Planning – Matthew Nasrallah

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