



FAIRMOUNT AVENUE FIRE STATION PROJECT

DRAFT ENVIRONMENTAL IMPACT REPORT

SCH NO. 2024010280 | Project No. S-14018

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
AB	Assembly Bill
AERMOD	American Meteorological Society/EPA Regulatory Model
ADA	Americans with Disabilities Act
ADRP	Archaeological Data Recovery program
AFY	Acre-Feet per Year
AIA	airport influence area
ALUCP	Airport Land Use Compatibility Plan
ALUOZ	Airport Compatibility Overlay Zone
AMLS	Above mean sea level
APE	Area of Potential Effect
APN	Accessor's Parcel Number
AR	Administrative Regulation
BCC	Bird of Conservation Concern
BCME	Biological Construction Mitigation/Monitoring Exhibit
BMP	best management practice
BMZ	Brush Management Zone
BGS	Below Ground Surface
Blueprint SD	City of San Diego General Plan
BMPU	Bicycle Master Plan
C&D	Construction and Demolition
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
CAL-NAGPRA	California Native American Graves Protection and Repatriation Act
Caltrans	California Department of Transportation
CAL FIRE	California Department of Forestry and Fire Protection
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act

FAIRMOUNT AVENUE FIRE STATION DRAFT EIR
ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
CEC	California Energy Commission
CFGC	California Fish and Game Code
CH ₄	methane
City	City of San Diego
CNRA	California Natural Resources Agency
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO ₂	carbon dioxide
County	County of San Diego
CPU	Community Plan Update
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CSV	Consultant Site Visit Record
CWA	Clean Water Act
CY	cubic yards
dB	decibel
dBA	A-weighted decibel
DEHQ/HMD	County of San Diego Department of Environmental Health and Quality, Hazardous Materials Division
DPM	diesel particulate matter
DSOD	California Department of Safety of Dams
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
ECP	City of San Diego Engineering and Capital Projects Department
ED	Environmental Designee
EIA	Energy Information Administration
EIR	Environmental Impact Report
EJ	Environmental Justice
EO	Executive Order
EOP	Emergency Operations Plan
EPA	Environmental Protection Agency
ESA	federal Endangered Species Act
ESD	City of San Diego Environmental Services Department
ESL	Environmentally Sensitive Lands
EV	Electrical Vehicle
EMMA	Emergency Management Mutual Aid
FAA	Federal Aviation Administration

FAIRMOUNT AVENUE FIRE STATION DRAFT EIR
ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FFLMR	Fuel Load Modeling Report
FRAP	Fire and Resource Assessment Program
FHSZS	Fire Hazard Severity Zones
First Update	First Update to the Climate Change Scoping Plan: Building on the Framework
General Plan	City of San Diego General Plan
GHG	greenhouse gas
GWP	Global Warming Potential
H&SC	California Health and Safety Code
HCFCs	Hydrochlorofluorocarbons
HFCS	Hydrofluorocarbons
HAF	Habitat Acquisition Fund
HMP	Hydromodification Management Plan
HVAC	Heating, ventilation, and air conditioning
I-	Interstate
IPCC	Intergovernmental Panel on Climate Change
IPS	Inches Per Second
IBC	International Building Code
IFC	International Fire Code
ITE	Institute of Transportation Engineers
IWRP	Integrated Water Resources Plan
LBVI	least Bell's vireo
LCI (formerly OPR)	Governor's Office of Land Use and Climate Innovation (Formerly Office of Planning and Research)
LCFS	Low Carbon Fuel Standard
LEA	Local Enforcement Agency
LEED	Leadership in Energy and Environmental Design
LOS	Level of Service
LRA	Local Responsibility Areas
LUAG	Land Use Adjacency Guidelines
LUST	Leaking Underground Storage Tanks
MBTA	Migratory Bird Treaty Act
MCCP	Mid-City Communities Plan
MHPA	Multi-Habitat Planning Area
MHMP	Multi-Jurisdictional Hazard Mitigation Plan
MLD	Most Likely Descendant

FAIRMOUNT AVENUE FIRE STATION DRAFT EIR
ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
MMC	City of San Diego Mitigation Monitoring and Coordination
MPO	Metropolitan Planning Organization
MSCP	Multiple Species Conservation Program
MTS	Metropolitan Transit System
MUTCD	Manual On Uniform Traffic Control Devices
MWD	Metropolitan Water District of Southern California
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO ₂	nitrogen dioxide
NO _x	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NSLU	noise sensitive land use
O ₃	ozone
OEHAA	Office of Environmental Health Hazard Assessment
PCE	Perchloroethylene
PFCS	Perfluorocarbons
PEIR	Program Environmental Impact Report
PI	Principal Investigator
PIF	Project Information Form
PM ₁₀	respirable particulate matter
PM _{2.5}	fine particulate matter
PMP	Parks Master Plan
ppb	parts per billion
PPV	peak particle velocity
PRC	Public Resources Code
psi	pounds per square inch
PUD	City of San Diego Public Utilities Department
PV	Photovoltaic
RAQS	Regional Air Quality Strategy
RCP	Regional Comprehensive Plan
RE	Resident Engineer
RECS	Recognized Environmental Conditions
Regional Plan	San Diego Forward: The Regional Plan
ROG	reactive organic gases
RMS	Root Mean Square

FAIRMOUNT AVENUE FIRE STATION DRAFT EIR
ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
RTP	regional transportation plan
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SAP	City of San Diego MSCP Subarea Plan
SB	Senate Bill
SSC	Species of Special Concern
SCAQMD	South Coast Air Quality Management District
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
SDMC	San Diego Municipal Code
SDNHM	San Diego Natural History Museum
SDG&E	San Diego Gas & Electric
SDMC	San Diego Municipal Code
SDP	Site Development Permit
SDPD	San Diego Police Department
SDRAQS	San Diego Regional Air Quality Strategy
SDUSD	San Diego Unified School District
SLF	Sacred Land File
SF	square feet
SFHA	Special Flood Hazard Area
SF ₆	Sulfur hexafluoride
SO ₂	sulfur dioxide
SWFL	southwestern willow flycatcher
SWRCB	State Water Resources Control Board
SWPP	Storm Water Pollution Prevention Plan
TAC	Toxic air contaminant
UWMP	Urban Water Management Plan
VOC	Volatile Organic Compounds
VMT	Vehicle Miles Traveled
WDR	Waste Discharge Requirements
"Whitebook"	City of San Diego Standard Specifications for Public Works Construction
WMP	Waste Management Plan
ZEMBOP	Zero Emissions Municipal Buildings and Operations Policy

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EXECUTIVE SUMMARY

This Environmental Impact Report (EIR) has been prepared for the proposed Fairmount Avenue Fire Station Project (project). This document analyzes the potential environmental effects associated with implementation of the project. The EIR was prepared under the direction of the City of San Diego's (City) 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.) and the CEQA Guidelines (14 CCR 15000 et seq.).

ES.1 PURPOSE AND SCOPE OF THE EIR

This EIR has been prepared in accordance with, and complies with all the criteria, standards, and procedures of CEQA (Public Resources Code [PRC], Section 21000 et seq.), the CEQA Guidelines (14 CCR 15000 et seq.), and the City's EIR Preparation Guidelines. Per PRC Section 21067 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 a better understanding of the physical and environmental changes that would accompany the project should it be approved. The EIR includes feasible mitigation measures which, when implemented, would provide the lead agency with ways to substantially minimize or avoid significant effects of the project on the environment. 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 is situated in the City of San Diego (City), specifically within the Mid-City: City Heights Community Plan area. The project envisions the construction of a 4-story fire station on a 1.28-acre vacant parcel of land, Accessor's Parcel Number (APN) 541-190-16. Access to the site would be from 47th Street that borders the site to the east. Geographically, the project site is located within the Mid City: City Heights area and is positioned immediately west of the Mid-City: Eastern Planning Area, to the north of the Southeastern San Diego and Encanto Neighborhoods Planning Areas, to the east of the Greater Golden Hill and North Park Planning Areas, and to the south of the Mid-City: Normal Heights and Mid-City: Kensington-Talmadge Planning Areas. The project area is bordered by Fairmount Avenue to the southwest, 47th Street to the north and east, and Chollas Creek to the northwest (see Figure 2-2, Project Site in Chapter 2, Environmental Setting).

Presently, the project site remains vacant and undeveloped with a variety of native and non-native vegetation. The vicinity is characterized by residential developments to the east and north, undeveloped land to the north and west, and an industrial area and a school located to the south of the project site. The designated impact area is defined by 47th Street to the east and open space connected to Chollas Creek canyon on the north, south, and west. The fire station is proposed in the southeast portion of the 1.28-acre site. The site is designated Industrial Employment City's General Plan and is zoned RS-1-7 (Residential-Single Unit) with a small portion of OP-2-1 (Open Space-Park). The land uses surrounding the project site encompass residential developments to the east and north, open space to the north and west, an industrial area, and a school to the south. Furthermore, a trucking company is situated approximately 260 feet southwest of the project site, while an elementary school is located approximately 290 feet to the southeast.

ES.3 PROJECT OBJECTIVES

The following are the goals and objectives of the project:

1. Increase the current and future capacity of the San Diego Fire Department by constructing a new fire station to serve the eastern portion of its service area.
2. Meet the San Diego Fire Department's 7 minute and 30 second response time to the eastern portion of the service area that is currently underserved.
3. Obtain a site large enough to accommodate a new fire station, free of constraints including flooding, toxic contaminants, power lines, in an area with limited traffic.
4. Provide a cohesive design that is compatible in use, scale and character with the surroundings.
5. Integrate the project into the existing topography of the site in a manner that reduces the grading footprint as well as impacts to environmental resources.

ES.4 PROJECT DESCRIPTION

The project outlines the development of a four-story fire station along with several supporting improvements. The fire station's access is via a single driveway off 47th Street that leads to the apparatus bay. Additionally, a 15-stall parking lot situated beneath the building overhang is accessible via a separate driveway. To minimize site grading and to incorporate the existing site topography, a portion of the building would be constructed using the existing hillside. This would be the basement level that would include the main lobby and shift office (962 square feet). The second floor (6,857 square feet) would contain the double wide deep garage for fire apparatus parking, an operational support shop, and storage and cleaning facilities. The fitness and support rooms would be located on the third floor (3,824 square feet). The fourth floor (6,595 square feet) would contain

10 firefighter bunk rooms, living area, kitchen, and restrooms. In total, the proposed building would be 22,443 square feet and 64-feet tall. This station would house an engine, a truck, and an ambulance (or two engines and an ambulance). The station would also be equipped with a trash enclosure, an emergency generator, and a 1,000-gallon diesel fuel tank.

The proposed landscape plan would include drought-tolerant native vegetation and low water use plants. The project would provide 6,049 square feet of planting area, which has been designed in accordance with the City's Municipal Code Section 142.0402, Land Development Manual, Landscape Standards, and other applicable city and regional standards for landscape installation and maintenance as identified in the Design Guidelines. Further, the project would implement the City's Brush Management Regulations found in Section 142.0412 of the Land Development Code

The project encompasses off-site improvements, including the installation of a new 22-foot and 40-foot wide driveway aprons, the addition of a new crosswalk, the construction of a new concrete curb, and the installation of a new power pole on 47th Street. A 0.52-acre temporary construction staging area for construction equipment and materials would be located approximately 0.40 miles southwest of the project site.

Construction activities would encompass groundwork and foundation preparation, utility installation, assembly of the building and associated apparatus bay, paving for parking and driveway areas, and landscaping enhancements.

The project includes avoidance measures that are conditions of the Site Development Permit (SDP) the City has developed to ensure compliance with the City's Biology Guidelines and MSCP. While avoidance and resource protection measures are not considered mitigation measures, applicable City avoidance measures for the project are listed below to ensure compliance and clearly outline City requirements.

AM-BIO-1a Measures Prior to Construction

- A. Biologist Verification:** The Engineering & Capital Project Department shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2018), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.
- B. Preconstruction Meeting:** The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up

mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.

- C. Biological Documents:** The Qualified Biologist shall submit all required documentation to the MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.
- D. BCME:** The Qualified Biologist shall present a Biological Construction Mitigation/ Monitoring Exhibit (BCME) which includes the biological documents listed in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.
- E. Avian Protection Requirements:** To avoid any direct impacts to the least Bell's vireo, Cooper Hawk, and yellow warbler, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds within the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The survey area shall cover the limits of disturbance and 300 feet from the area of disturbance. The results of the pre-construction survey shall be submitted to MMC for review and approval prior to initiating any construction activities. If nesting least Bell's vireo, Cooper Hawk, and yellow warbler are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable state and federal laws (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 the least Bell's vireo, Cooper Hawk, and yellow warbler or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City DSD for review and approval and implemented to the satisfaction of

the City. The City's MMC and Qualified Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction.

- F. Resource Delineation:** Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions, as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including least Bell's vireo, Cooper Hawk, and yellow warbler) during construction. Appropriate steps/care shall be taken to minimize attraction of nest predators to the site.
- G. Education:** Prior to commencement of construction activities, the Qualified Biologist shall meet with the project contractor and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

AM-BIO-1b Measures During Construction

- A. Monitoring:** All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSV). The CSV shall be e-mailed to the MMC on the 1st day of monitoring, the 1st week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.
- B. Subsequent Resource Identification:** The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna on site (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state, or federal regulations have been determined and applied by the Qualified Biologist.

AM-BIO-1c. Post Construction Measures

- A. Follow-Up Reporting:** In the event impacts exceed previously identified acreage amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, CEQA, and other applicable local, state, and federal laws. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City MMC within 30 days of construction completion.

AM-BIO-2 LUAG Compliance Measures

Coastal California gnatcatcher: Prior to construction, the City's Environmental Designee (ED) or Mitigation Monitoring and Coordination (MMC) staff shall verify that the MHPA boundaries and the project requirements regarding the California gnatcatcher, specified as follows, are shown on the construction plans.

No clearing, grubbing, grading, or other construction activities shall occur during the California gnatcatcher breeding season (March 1 to August 15), until the following requirements have been met to the satisfaction of the City's ED (or MMC staff):

1. Between March 1 and August 15, no clearing, grubbing, or grading of occupied California gnatcatcher habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; and
2. 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 California gnatcatcher habitat in 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 shall be completed by a Qualified Acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the MMC staff 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
3. At least 2 weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, temporary noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities shall not exceed 60 dB(a) hourly average at the edge of habitat occupied by the 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 Qualified 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). Construction noise monitoring 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 Qualified Biologist and the MMC, 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.

4. Presence/absence of coastal California gnatcatchers shall be determined through protocol surveys conducted by a Qualified Biologist (possessing a valid Endangered Species Act Section 10 (a)(1)(A) Recovery Permit). If coastal California gnatcatchers are not detected during the protocol survey, the Qualified Biologist shall submit substantial evidence to MMC, U.S. Fish and Wildlife Service, and California Department of Fish and Wildlife staff that demonstrates whether or not measures, such as temporary noise attenuating walls, are necessary between March 1 and August 15 as follows:
 - a. If this evidence indicates the potential is high for coastal California gnatcatcher to be present based on historical records or site condition, then Condition 3 above shall be adhered to.
 - b. If this evidence concludes that no impacts to this species are anticipated, no measures would be necessary.

AM-BIO-3 Temporary Impact Revegetation

Temporary disturbance of 0.039 acre of Diegan coastal sage scrub within the off-site construction staging area shall be revegetated in accordance with the City of San Diego Landscape Standards included in the City's Land Development Manual. Habitat revegetation shall feature native species that are typical of the area, and erosion control features shall include silt fence and straw fiber rolls, where appropriate (e.g., in areas where sheet flow during rain events may cause erosion). The revegetation areas shall be monitored and maintained for a minimum of 25 months to ensure adequate establishment and sustainability of the plantings/seedlings to reduce the risk of erosion and/or non-native, invasive plant species establishment, in accordance with the Landscape Standards in the City's Land Development Manual.

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, lists mitigation measures to reduce and/or avoid significant environmental effects, and concludes if 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 in Chapter 5 and fully contained in the project's Mitigation Monitoring and Reporting Program.

As shown in Table ES-1, impacts related to air quality, biological resources, historic resources, and tribal cultural resources, were found to be potentially significant prior to the incorporation of mitigation. All potentially significant impacts would be reduced to a less than significant level with the implementation of proposed mitigation measures.

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 NOP for the EIR was distributed on January 12, 2024, for a 30-day public review and comment period, and a public scoping meeting was held on January 30, 2024. Public comments were received on the NOP that reflect controversy on several environmental issues.

Issues of controversy raised include concerns related to land use, transportation/circulation, biological resources, visual effects and neighborhood character, health and safety, hydrology and water quality, noise, cultural resources, and tribal cultural resources. The NOP, 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

- Historic Resources
- Tribal Cultural Resources

A Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093 would not be required as all potentially significant impacts would be reduced to a less than significant level after mitigation.

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 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)).

Pursuant to the CEQA Guidelines, a range of alternatives for the proposed project are considered in this EIR. These alternatives were developed in the course of project planning, environmental review, and public input. The discussion in this section provides a description of alternatives considered and an analysis of whether the alternatives meet most of the objectives of the project.

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 15126.6 (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.

ES.8.1 NO PROJECT/NO DEVELOPMENT ALTERNATIVE

CEQA Guidelines Section 15126.6(e) requires that an EIR evaluate a “no project” alternative, along with its impacts. The purpose of describing and analyzing a no project alternative is to allow a lead agency to compare the impacts of approving the project to the impacts of not approving it. Specifically, Section 15126.6(e)(3)(B) requires that an EIR for a development project on an identifiable property address the no project alternative as circumstances under which the project does not proceed. This No Project/No Development Alternative assumes that no development would occur, and the project site would remain as undeveloped land. As no changes would occur, the No Project/No Development would avoid all potentially significant impacts of the project.

ES.8.2 NO PROJECT/GENERAL PLAN DEVELOPMENT ALTERNATIVE

The second “no project” alternative to be evaluated assumes that the project would not proceed; instead, the project site would eventually be developed according to the land use designation and assumptions in the City’s General Plan and MCCP. As the site is designated by the General Plan for Industrial Employment and conceptualized in the MCCP to support general industrial uses, it is reasonable to assume that absent the proposed project, the project site could instead be developed with light manufacturing, storage and distribution, and office or commercial uses accessory to the primary industrial use. It is assumed the entire 1.28-acre site would be developed. It is assumed the same off-site construction staging area would also be required. The project site is zoned OP-2-1 (Open Space) and RS-1-7 (Residential-Single Unit) in the City’s Zoning Code. It is assumed a re-zone would be required.

The No Project/General Plan Development Alternative does not meet project objectives 1 through 3, which are specific to development of a fire station. Overall, this alternative does not meet the project objectives as well as the project.

ES.8.3 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. Factors that need to be considered when identifying an off-site alternative includes 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.

The alternative site chosen for this analysis comprises three parcels (APNs 541-241-01-00; 540-495-01-00; 540-495-04-00) located near 4029/4070 Home Avenue, approximately one mile southwest of the project site. This site is designated Industrial Employment in the General Plan and zoned IL-2-1 and spans a total of 1.14 acres across the three undeveloped parcels. This site was originally

preferred for the new fire station because of the large size of the combined lots, which would presumably allow for design flexibility, including multiple options for ingress/egress. However, the site was found to be a former landfill and was a burn ash site. The site is located at the base of a canyon surrounded by single-family homes higher in elevation to the north, commercial and light industrial uses to the northeast and southwest along Home Avenue, and military housing apartments to the southeast. The fire station built at this alternative site location would remain 22,443 square feet and would cover a minimum of 0.59 acres.

It is unlikely that this Site Location Alternative would fully meet project objectives 2, 4, and 5. In addition, this alternative does not meet project objective 3, which calls for a site free of constraints including toxic contaminants. Overall, this alternative does not meet the project objectives as well as the project

ES.8.4 REDUCED FOOTPRINT ALTERNATIVE

The Reduced Footprint Alternative assumes that the project would be developed with a 5-story building rather than a 4-story building to reduce the overall project footprint and area of ground disturbance. The 22,443 SF of the fire station would not change including the uses per floor, but the SF would be divided amongst 5 stories so that the building footprint and overall lot coverage would be reduced. This alternative would result in less impervious surface area, would reduce disturbance to biological resources including the coastal sage scrub natural community and California gnatcatcher habitat, and would reduce potential impacts resulting from ground disturbance such as soil erosion and damage to cultural resources and paleontological resources. The offsite construction staging area would also be included and would not change from the project.

The Reduced Footprint Alternative would meet most project objectives. As this alternative would reduce the footprint of the proposed fire station in comparison to the project, objective 5 would be met to a greater extent than the proposed project. However, A five-story station would likely lead to longer response times as there are more flights of stairs and/or fire poles for crews to navigate, leading to additional time to get to the fire apparatus and out the door. Further, more stairs and/or fire poles introduces additional safety hazards. With more stairs and fire poles to navigate, there is higher risk for injuries. Crews need to move quickly to get to the apparatus and out the door when an emergency response is needed, including at night. If a crew is injured on the way to an emergency response, that response is likely delayed. Thus, a 5-story design would have the potential for delayed emergency responses, and therefore would not meet objective 2. This alternative would not meet objective 4 to the same extent, as a 5-story building would result in exceeding local zoning standards to a greater degree as the proposed project, which could result in a 5-story design substantially different from the bulk and scale of the surrounding community. Overall, this alternative meets objectives 1, 3, and 5.

ES.8.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Pursuant to Section 15126.6 of the CEQA Guidelines, an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, and the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects.

The environmentally superior project would be the No Project/No Development Alternative as it would avoid all environmental impacts. However, it would also not achieve the basic project objectives. 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. The context of an environmentally superior alternative is based on consideration of several factors, including the proposed project's objectives and the ability to fulfill the goals while reducing potential impacts to the environment. Thus, the environmentally superior alternative, as identified in the analysis above, would be the Reduced Footprint Alternative.

The issue areas that would be less than significant with or without mitigation under the proposed project that would be slightly reduced under the Reduced Footprint Alternative include biological resources, air quality and odor, geologic conditions, greenhouse gas emissions, hydrology, noise, paleontological resources, historical resources, and tribal cultural resources.

ES.9 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Table ES-1 summarizes the potential impacts and proposed mitigation measures for the proposed project.

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
<i>Air Quality</i>		
The results of the Health Risk Assessment (HRA) demonstrate that the TAC exposure from construction diesel exhaust emissions would result in cancer risk of 57.9 in 1 million, which would exceed the 10 in 1 million threshold. Therefore, TAC emissions from construction of the proposed project would expose sensitive receptors to substantial pollutant concentrations and would result in a potentially significant impact (Impact Issue AIR-4) .	<p>MM-AQ-1. Require Use of Tier 4 Final Off-Road Equipment During Construction. Prior to the commencement of construction activities, the City shall require its construction contractor to demonstrate that all 50-horsepower or greater diesel-powered equipment is powered with California Air Resources Board (CARB)-certified Tier 4 Final or better engines.</p> <p>In the event of changed circumstances (e.g., changes in the availability of specific types of construction equipment), the construction contractor may submit a request to the City of San Diego Environmental Designee (ED) to apply an equivalent method of achieving project-generated construction emissions that fall below the numeric cancer risk standards established by the San Diego Air Pollution Control District (SDAPCD). Documentation using industry-standard emission estimation methodologies shall be furnished to the City of San Diego ED demonstrating that estimated project-generated construction emissions would not exceed the applicable SDAPCD cancer risk threshold with the alternate construction method(s). If the documentation demonstrates that project-generated construction emissions will remain below the applicable SDAPCD cancer risk threshold, then the City of San Diego ED may approve the</p>	Less than Significant

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	alternate construction method(s), at the Director's discretion. Required construction equipment fleet and methodologies approved by the City shall be included in the contract specifications for the construction contractor.	
<i>Biological Resources</i>		
The project would impact more than 0.1 acres of land within upland habitats (Tier I through Tier III), and therefore impacts would be potentially significant. (Impact Issue BIO-2)	MM-BIO-1. To compensate for the loss of 0.495 acres of coastal sage scrub (including disturbed) and 0.006-acres of mixed chaparral, mitigation would be provided through allocation of credits from the Marron Valley Cornerstone Land Bank, which occurs inside the MHPA. Payment and credit allocation shall be provided for a total of 0.498 acres to achieve the required mitigation ratios prior to the start of construction (Table 5.4-6). The City of San Diego Engineering and Capital Projects Department (ECP) shall be required to contribute the estimated average per acre land cost, multiplied by the mitigation ratio plus any required amount for administration.	Less than Significant
Impacts to Tier II and III upland habitats would result in a loss of suitable habitat for special-status wildlife including orange-throated whiptail, San Diegan tiger-whiptail, red-diamondback rattlesnake, Allen's hummingbird, California thrasher, two-striped garter snake, Dulzura pocket mouse,	MM-BIO-2. Crotch's Bumble Bee. Prior to the Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, the City of San Diego Environmental Designee (ED) shall verify the following project requirements	Less than Significant

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
<p>northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, San Diego desert woodrat, Yuma myotis, monarch, and Crotch's bumble bee. There is also the potential for the project to result in permanent direct impacts to nesting Crotch's bumble bee as well as noise impacts related to least Bell's vireo. Impacts to special-status wildlife species are considered potentially significant. (Impact Issue BIO-1)</p>	<p>regarding the Crotch's bumble bee are shown on the construction plans:</p> <ul style="list-style-type: none"> A. To avoid impacts to 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 removal of habitat in the proposed area of disturbance must occur during the colony active period, a Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of Crotch's bumble bee nesting within the proposed area of disturbance and follow the methodology developed consistent with the California Department of Fish Wildlife (CDFW) Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (CDFW 2023). B. A Qualified Biologist shall demonstrate the following qualifications: at least 40 hours of experience surveying for bee or other co-occurring aerial invertebrate species (such as Quino checkerspot butterfly) and who have completed a Crotch's bumble bee detection/identification training by an expert Crotch's 	

**Table ES-1.
Summary of Significant Environmental Impacts and Mitigation**

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>bumble bee entomologist; or the biologist must have at least 20 hours of experience directly observing Crotch's bumble bee.</p> <p>C. The pre -survey shall be conducted by the Qualified Biologist within 30 calendar days prior to the start of construction activities (including removal of vegetation) and shall include a minimum of three (3) visits, a minimum of one (1) week apart.</p> <p>D. The Qualified Biologist/owner permittee shall submit the results of the pre-construction survey to City DSD (Mitigation Monitoring and Coordination), City Planning Department (MSCP) staff, and CDFW for review and written approval prior to initiating any construction activities.</p> <p>E. If Crotch's bumble bees are determined to be present, then a photographic survey following CDFW guidance (i.e., CDFW Survey Considerations for CESA Candidate Bumble Bee Species) shall be required. If additional activities (e.g., capture or handling) are deemed necessary based on photographic surveys, then the</p>	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>Qualified Biologist shall obtain 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.</p> <p>F. If preconstruction surveys identify active Crotch's bumble bee nest colonies, the Qualified Biologist shall notify CDFW in writing and establish, monitor, and maintain no-work buffers around the nest(s) and any associated floral resources. The size and configuration of the no-work buffer shall be based on best professional judgment of the Qualified Biologist in consultation with CDFW. At a minimum, the buffer shall provide at least 50 feet of clearance from construction activities around any nest entrances and maintain disturbance-free airspace between the nest and nearby floral resources. Construction activities shall not occur within the no work buffers until the colony is no longer active (i.e., no bees are seen flying in or out of the nest for three consecutive days indicating the colony has</p>	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>completed its nesting season and the next season's queens have dispersed from the colony.</p> <p>MM-BIO-3. Avoidance of LBVI and SWFL Take. Prior to the issuance of a grading permit (or preconstruction meeting if a grading permit is not required), the City's (ED)/ Mitigation Monitoring Coordination staff (MMC) shall verify that Multi-Habitat Planning Area (MHPA) boundaries and the requirements regarding the least Bell's vireo and southwestern willow flycatcher, as specified below, are shown on the construction plans.</p> <p>No clearing, grubbing, grading, or other construction activities shall occur during the least Bell's vireo breeding season (March 15 through September 15) or Southwestern willow flycatcher habitat during the Southwestern willow flycatcher breeding season (May 1 through September 1) until the following requirements have been met to the satisfaction of the ED/MMC:</p> <ol style="list-style-type: none"> 1. 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 	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>be subject to construction noise levels exceeding 60 decibels [dB(A)] hourly average for the presence of the least Bell's vireo and southwestern willow flycatcher. Surveys for least Bell's vireo, shall be conducted pursuant to the protocol survey guidelines established by the USFWS within the breeding season prior to the commencement of any construction. If least Bell's vireo or southwestern willow flycatcher are present, then the following conditions must be met:</p> <ul style="list-style-type: none"> a. March 15 through September 15 for least Bell's vireo, no clearing, grubbing, or grading of occupied habitat shall be permitted. May 1 through September 1 for southwestern willow flycatcher no clearing, grubbing, or grading through occupied habitat shall be permitted. b. Areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; and c. March 15 through September 15 for least Bell's vireo no construction activities shall occur within any 	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	portion of the site where construction activities would result in noise levels exceeding 60 dB(A) hourly average at the edge of occupied habitat. May 1 through September 1 for southwestern willow flycatcher 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 habitat. An analysis showing that noise generated by construction activities shall not exceed 60 dB(A) hourly average at the edge of occupied habitat must be completed by a Qualified Acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the ED/MMC 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,	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>d. At least 2 weeks prior to the commencement of construction activities, under the direction of a Qualified Acoustician, attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities would not exceed 60 dB(A) hourly average at the edge of habitat occupied by the least Bell's vireo or southwestern willow flycatcher. 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 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, construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (September 16 and September 2 for the LBVI and SWFL, respectively). Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently</p>	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>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 Qualified Biologist and the ED/MMC, 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.</p> <p>2. If least Bell's vireo and southwestern willow flycatcher are not detected during the protocol surveys, the Qualified Biologist shall submit substantial evidence to the ED/MMC and applicable resource agencies that demonstrates whether or not mitigation measures such as noise walls are necessary from March 15 through September 15 for least Bell's vireo and May 1 through</p>	

**Table ES-1.
Summary of Significant Environmental Impacts and Mitigation**

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>September 1 for southwestern willow flycatcher, adherence to the following is required:</p> <ul style="list-style-type: none"> a. If this evidence indicates that the potential is high for least Bell's vireo and southwestern willow flycatcher to be present based on historical records or site conditions, then Condition 1(a) shall be adhered to as specified above. b. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary. 	
<p>Short-term construction activities could result in noise levels that could affect habitat occupied by breeding California gnatcatcher, least Bell's vireo, or raptors including Cooper's hawk resulting in a potentially significant impact. (Impact Issue BIO-5)</p>	<p>MM-BIO-3. Avoidance of LBVI Take</p>	<p>Less than Significant</p>
<i>Historical Resources</i>		

**Table ES-1.
Summary of Significant Environmental Impacts and Mitigation**

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
<p>Due to the low-to-moderate sensitivity for identifying intact subsurface archaeological deposits within areas that have not been previously disturbed, ground disturbance associated with project construction has the potential to uncover previously unknown archaeological and Native American resources, resulting in a potentially significant impact. (Impact Issue HIST-1)</p>	<p>MM-HIST-1. Archaeological Resources</p> <p><i>I. Prior to Permit Issuance or Bid Opening/Bid Award</i></p> <p>A. Entitlements Plan Check</p> <p>1. Prior to permit issuance or Bid Opening/Bid Award, whichever is applicable, the City of San Diego Environmental Designee (ED) shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.</p> <p>B. Letters of Qualification have been submitted to the City of San Diego ED</p> <p>1. Prior to the Bid Award, the applicant shall submit a letter of verification to the City of San Diego ED identifying the project's Principal Investigator (PI) and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable,</p>	<p>Less than Significant</p>

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.</p> <p>2. City of San Diego ED will provide a letter to the applicant confirming the qualifications of the PI and that all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.</p> <p>3. Prior to starting work, the applicant must obtain written approval from the City of San Diego ED for any personnel changes associated with the monitoring program.</p> <p>II. Prior to the Start of Construction</p> <p>A. Verification of Records Search</p> <p>1. The PI shall provide verification to the City of San Diego ED that a site-specific records search (quarter-mile radius) has been completed. Verification</p>	

**Table ES-1.
Summary of Significant Environmental Impacts and Mitigation**

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>includes, but is not limited to, a copy of a confirmation letter from the South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.</p> <ol style="list-style-type: none"> 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities. 3. The PI may submit a detailed letter to the City of San Diego ED requesting a reduction to the quarter-mile radius. <p>B. PI Shall Attend Precon Meetings</p> <ol style="list-style-type: none"> 1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE) and/or Building Investigator (BI) as appropriate, and the City of San Diego ED. The qualified 	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>Archaeologist and Native American Monitor shall attend any grading/excavation-related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.</p> <p>a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.</p> <p>2. Acknowledgement of Responsibility for Curation (CIP or Other Public Projects)</p> <p>The applicant shall submit a letter to MMC acknowledging their responsibility for the cost of curation associated with all phases of the archaeological monitoring program.</p> <p>3. Identify Areas to be Monitored</p> <p>Prior to the start of any work that requires</p>	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to the City of San Diego ED identifying the areas to be monitored including the delineation of grading/excavation limits.</p> <p>The AME shall be based on the results of a site-specific records search as well as information regarding the age of existing pipelines, laterals, and associated appurtenances and/or any known soil conditions (native or formation).</p> <p>The City of San Diego ED shall notify the PI that the AME has been approved.</p> <p>4. When Monitoring Will Occur</p> <p>a. Prior to starting any work, the PI shall also submit a construction schedule to the City of San Diego</p>	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>ED through the RE indicating when and where monitoring will occur.</p> <p>b. The PI may submit a detailed letter to the City of San Diego ED prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information, such as a review of final construction documents which indicate conditions such as the age of the existing pipe to be replaced, depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.</p> <p>5. Approval of AME and Construction Schedule</p> <p>After the City of San Diego ED approves the AME, the PI shall submit to the City of San Diego ED written authorization of the AME and Construction Schedule from the CM.</p> <p>III. During Construction</p>	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>A. Monitor Shall be Present During Grading/Excavation/Trenching</p> <ol style="list-style-type: none"> 1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and the City of San Diego ED of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances, OSHA safety requirements may necessitate modification of the AME.. 2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and the City of San Diego ED. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work 	

**Table ES-1.
Summary of Significant Environmental Impacts and Mitigation**

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>shall stop, and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.</p> <p>3. The PI may submit a detailed letter to the City of San Diego ED during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.</p> <p>4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSV). The CM shall fax the CSVs to the RE on the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to the City of San Diego ED.</p> <p>B. Discovery Notification Process</p>	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<ol style="list-style-type: none">1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil-disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.2. The Monitor shall immediately notify the PI (unless the Monitor is the PI) of the discovery.3. The PI shall immediately notify the City of San Diego ED by phone of the discovery and, if possible, submit written documentation by fax or email within 24 hours, with photos of the resource in context.4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered. <p>C. Determination of Significance</p>	

**Table ES-1.
Summary of Significant Environmental Impacts and Mitigation**

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<ol style="list-style-type: none"> 1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow the protocol in Section IV below. <ol style="list-style-type: none"> a. The PI shall immediately notify the City of San Diego ED by phone to discuss significance determination and shall also submit a letter to the City of San Diego ED indicating whether additional mitigation is required. b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) and obtain written approval of the program from the City of San Diego ED , CM and RE. ADRP and any mitigation must be approved by the City of San Diego ED , RE and/or CM before ground-disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also a historical resource as defined in CEQA Section 15064.5, then the limits on the amount(s) that a project applicant may be 	

**Table ES-1.
Summary of Significant Environmental Impacts and Mitigation**

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.</p> <p>(1). Note: For pipeline trenching and other linear projects in the public Right-of-Way, the PI shall implement the Discovery Process for Pipeline Trenching projects identified below under "D."</p> <p>c. If the resource is not significant, the PI shall submit a letter to the City of San Diego ED indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.</p> <p>(1). Note: For Pipeline Trenching and other linear projects in the public Right-of-Way, if the deposit is limited in size, both in length and depth; the information value is limited and is not</p>	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>associated with any other resources; and there are no unique features/artifacts associated with the deposit, the discovery should be considered not significant.</p> <p>(2). Note, for Pipeline Trenching and other linear projects in the public Right-of-Way, if significance cannot be determined, the Final Monitoring Report and Site Record (DPR Form 523A/B) shall identify the discovery as Potentially Significant.</p> <p>IV. Discovery of Human Remains</p> <p>If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:</p>	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>A. Notification</p> <ol style="list-style-type: none">1. Archaeological Monitor shall notify the RE, City of San Diego ED , and the PI, if the Monitor is not qualified as a PI. The City of San Diego ED will notify the appropriate E&CP Environmental Designee to assist with the discovery notification process.2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone. <p>B. Isolate discovery site</p> <ol style="list-style-type: none">1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains.2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenience.	

**Table ES-1.
Summary of Significant Environmental Impacts and Mitigation**

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.</p> <p>C. If Human Remains ARE determined to be Native American</p> <ol style="list-style-type: none"> 1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call. 2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information. 3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes. 	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<ul style="list-style-type: none">4. The MLD will have 48 hours to make recommendations to the property owner or representative for the treatment or disposition with proper dignity of the human remains and associated grave goods.5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:<ul style="list-style-type: none">a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR;b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN	

**Table ES-1.
Summary of Significant Environmental Impacts and Mitigation**

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>c. To protect these sites, the landowner shall do one or more of the following:</p> <ul style="list-style-type: none"> (1) Record the site with the NAHC; (2) Record an open space or conservation easement; or (3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner. <p>d. Upon the discovery of multiple Native American human remains during a ground-disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human</p>	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>remains. Culturally appropriate treatment of such a discovery may be ascertained from a review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and items associated and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.</p> <p>B. If Human Remains are NOT Native American</p> <ol style="list-style-type: none"> 1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial. 2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98). 3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for the internment of the human remains shall be made 	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>in consultation with the City of San Diego ED , E&CP Environmental Designee, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.</p> <p>V. Night and/or Weekend Work</p> <p>A. If night and/or weekend work is included in the contract</p> <ol style="list-style-type: none"> 1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting. 2. The following procedures shall be followed. <ol style="list-style-type: none"> a. No Discoveries In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSV and submit to the City of San Diego ED via fax by 8 a.m. of the next business day. b. Discoveries 	

**Table ES-1.
Summary of Significant Environmental Impacts and Mitigation**

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>All discoveries shall be processed and documented using the existing procedures detailed in Sections III – During Construction, and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.</p> <p>c. Potentially Significant Discoveries</p> <p>If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III – During Construction and IV – Discovery of Human Remains shall be followed.</p> <p>d. The PI shall immediately contact the RE and the City of San Diego ED , or by 8 a.m. of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.</p> <p>B. If night and/or weekend work becomes necessary during the course of construction</p>	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<ol style="list-style-type: none"> 1. The Construction Manager shall notify the RE at least 24 hours before the work is to begin. 2. The RE shall notify the City of San Diego ED immediately. C. All other procedures described above shall apply, as appropriate. <p>VI. Post Construction</p> <ol style="list-style-type: none"> A. Submittal of Draft Monitoring Report <ol style="list-style-type: none"> 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to the City of San Diego ED via the RE for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe as a result of delays with analysis, special study results or other complex 	

**Table ES-1.
Summary of Significant Environmental Impacts and Mitigation**

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>issues, a schedule shall be submitted to the City of San Diego ED establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.</p> <p>a. For significant archaeological resources encountered during monitoring, the Draft Monitoring Report shall include the Archaeological Data Recovery Program or Pipeline Trenching Discovery Process.</p> <p>b. Recording Sites with State of California Department of Parks and Recreation</p> <p>The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.</p>	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<ol style="list-style-type: none"> 2. The City of San Diego ED shall return the Draft Monitoring Report to the PI via the RE for revision or, for preparation of the Final Report. 3. The PI shall submit a revised Draft Monitoring Report to the City of San Diego ED via the RE for approval. 4. The City of San Diego ED shall provide written verification to the PI of the approved report. 5. The City of San Diego ED shall notify the RE of receipt of all Draft Monitoring Report submittals and approvals. <p>B. Handling of Artifacts</p> <ol style="list-style-type: none"> 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and cataloged. 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area, that faunal material is identified as to species, and that specialty studies are completed, as appropriate. 	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<p>C. Curation of artifacts: Accession Agreement and Acceptance Verification</p> <p>1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with the City of San Diego ED and the Native American representative, as applicable.</p> <p>2. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection C.</p>	

**Table ES-1.
Summary of Significant Environmental Impacts and Mitigation**

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	<ol style="list-style-type: none"> 3. The PI shall submit the Accession Agreement and catalog record(s) to the RE or BI, as appropriate for donor signature, with a copy submitted to the City of San Diego ED . 4. The RE or BI, as appropriate, shall obtain a signature on the Accession Agreement and shall return it to PI with a copy submitted to the City of San Diego ED . 5. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE and the City of San Diego ED . <p>D. Final Monitoring Report(s)</p> <ol style="list-style-type: none"> 1. After notification from the City of San Diego ED of the approved report, the PI shall submit one copy of the approved Final Monitoring Report to the RE and one copy to the City of San Diego ED (even if negative) within 90 days. 2. The RE shall not issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from the City of San Diego ED , which includes 	

Table ES-1.
Summary of Significant Environmental Impacts and Mitigation

Impact	Mitigation Measure(s)	Level of Significance After Mitigation
	the Acceptance Verification from the curation institution.	
No existing formal cemeteries or known burials are identified within the project APE. However, in the event of an unanticipated discovery of human remains during construction, the project could result in potentially significant impacts. (Impact Issue HIST-3)	MM-HIST-1. Archeological Resources.	Less than Significant
<i>Tribal Cultural Resources</i>		
Because ground disturbance associated with construction has the potential to uncover previously unknown TCRs and Native American resources, the impact is considered potentially significant . (Impact Issue TCR-1)	MM-HIST-1	Less than Significant

CHAPTER 1 INTRODUCTION

This chapter provides the purpose and legal authority for this Environmental Impact Report (EIR) for the proposed Fairmount Avenue Fire Station Project (project), the EIR scope and process, and an explanation of how the EIR is organized.

1.1 EIR PURPOSE

The purpose of an EIR is to accomplish the following:

- Inform governmental decision makers and the general public of the potentially significant environmental effects of a project.
- Identify the ways that environmental impacts can be avoided or significantly reduced.
- Reduce environmental impacts by identifying changes in a 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 in accordance with California Environmental Quality Act (CEQA) Guidelines Sections 15050 and 15367, the City has been designated the “lead agency,” which is defined as the “public agency which has the principal responsibility for carrying out or disapproving a project.” This Draft EIR complies with the criteria, standards, and procedures of CEQA (California Public Resources Code [PRC], Section 21000 et seq.), the CEQA Guidelines (14 CCR 15000 et seq.) and has been prepared in accordance with the City’s EIR Guidelines (City of San Diego 2022) and the City’s CEQA Significance Determination Thresholds (City of San Diego 2022). Further, this document has been prepared as a project EIR pursuant to Section 15161 of the State CEQA Guidelines and represents the independent judgment of the City as Lead Agency.

1.1.2 INTENDED USE OF THE EIR

An EIR is an informational document that provides 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 implementation of a project, (2) possible ways to minimize any significant environmental impacts, and (3) feasible alternatives to a project (PRC Section 21002.1[a]; 14 Section 15121[a]). Responsible agencies will use this EIR to fulfill their legal authority to issue permits for 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 feasible recommended mitigation measures which, when implemented, would substantially lessen or avoid significant effects of the project on the environment. Alternatives to the project are presented to evaluate alternative development scenarios that can further reduce or avoid significant project impacts.

1.2 LEAD, RESPONSIBLE AND TRUSTEE AGENCIES

1.2.1 LEAD AGENCY

The City is the Lead Agency, defined in CEQA Guidelines Sections 15050 and 15367 as the “public agency which has the principal responsibility for carrying out or approving a project.” The lead agency is also responsible for determining the scope of the environmental analysis, preparing the EIR, and responding to comments received on the Draft EIR. Prior to making a decision to approve a project, the lead agency is required to certify that the EIR has been completed in compliance with CEQA, that the decision-making body has reviewed and considered the information in the EIR, and that the EIR reflects the independent judgment of the City. This EIR is intended to analyze the environmental impacts associated with the discretionary actions that require ultimate approval by the San Diego City Council.

1.2.2 RESPONSIBLE AND TRUSTEE AGENCIES

A Responsible Agency defined pursuant to CEQA Guidelines Section 15381, are state and local agencies other than the lead agency that have some authority to carry out or approve a project or that are required to approve a portion of the project or approve a permit for which a lead agency is preparing or has prepared an EIR or Initial Study/Negative Declaration (CEQA Guidelines Section 15813).

A Trustee Agency is defined in Section 15386 of the CEQA Guidelines as a designated public agency with legal jurisdiction over natural resources that are held in trust for the people of the state of California. Trustee and responsible agencies for the project include but are not limited to the California Department of Fish and Wildlife, San Diego Regional Water Quality Control Board, San Diego Air Pollution Control District.

1.3 CEQA PROCESS

1.3.1 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 project and other related actions are described in Chapter 3, Project Description.

1.3.2 NOTICE OF PREPARATION

In reviewing the project application, the City concluded that the project could result in potentially significant environmental impacts. As Lead Agency, the City prepared a Notice of Preparation (NOP) that was circulated for public and agency review from January 12, 2024, through February 12, 2024, in accordance with Section 15082 of the CEQA Guidelines (see Appendix A). The purpose of the NOP was to provide notification that an EIR for the project was to be prepared and to solicit guidance on the scope and content of the document. Consistent with Section 15082 of the CEQA Guidelines, a public scoping meeting was scheduled to receive comments regarding the scope and analysis of the EIR on January 30, 2024.

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. Based on the information available at the time, the project was determined to have the potential to result in significant environmental impacts to the following subject areas:

- Air Quality and Odor
- Biological Resources
- Noise
- Energy
- Geologic Conditions
- Greenhouse Gas Emissions
- Health and Safety
- Hydrology
- Land Use
- Paleontological Resources
- Historic Resources
- Public Services and Facilities
- Public Utilities
- Transportation
- Tribal Cultural Resources

- Visual Effects and Neighborhood Character
- Water Quality
- Wildfire

Subsequent to release of the NOP, it was determined that due to the project location and type of project no agricultural/forestry resources, mineral resources, or an increase in population and housing either exist or would result due to implementation of the project. Thus, these topics are discussed in Chapter 7, Effects Found Not to be Significant and is not further evaluated in Chapter 5. Refer to Chapter 7 for additional details.

Verbal and written comments received during the scoping process have been taken into consideration during the preparation of this Draft EIR. An outline of the issues noted during the scoping process is contained in the Areas of Controversy/Issues to be Resolved discussion in the Executive Summary chapter. 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.

EIR Adequacy

The level of detail contained throughout this EIR is consistent with Section 15151 of the CEQA Guidelines, which states the following:

An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of the environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

1.3.3 EIR ORGANIZATION

The content and format of this Draft EIR are in accordance with the most recent guidelines and amendments to CEQA and the State CEQA Guidelines.

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

- **Chapter ES, Executive Summary.** This chapter provides a summary of the EIR; a brief description of the project; an identification 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 project alternatives and a comparison of the potential impacts of the alternatives with those of the 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.
- **Chapter 2, Environmental Setting.** This chapter describes the location of the project site and on the physical features present and the surrounding areas. In addition, a local and regional description of the environmental setting of the project area, as well as the existing zoning and General Plan/Community Plan land use designations of the site and its contiguous properties, area topography, drainage characteristics, and vegetation is provided.
- **Chapter 3, Project Description.** This chapter provides a detailed description of the project, including its location, background information, project 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 project review (i.e., in response to City's review of the project, NOP comments, 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 project in the following sections: land use, transportation, air quality, biological resources, energy, geologic conditions, greenhouse gas emissions, health and safety, hydrology, noise, paleontological resources, historic, public services, public utilities, tribal cultural resources, visual effects, water quality, and wildfire. The analysis of each issue begins with a discussion of the existing setting/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.
- **Chapter 6, Cumulative Impacts.** This chapter analyzes the project in addition to other cumulative projects in the surrounding area to determine if the project's contribution to an existing cumulative impact would be considerable. It is noted that some topics are inherently cumulative, such as greenhouse gas emissions, and those topics are detailed in Chapter 5 with a summary included in Chapter 6.
- **Chapter 7, Effects Found Not to Be Significant.** This chapter describes issue areas that were determined to be less than significant and were not analyzed in detail as part of the EIR. This chapter includes agricultural and forestry resources, mineral resources, and population and housing.

- **Chapter 8, Mandatory Discussion Areas.** This chapter evaluates the potential influence the 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 and describes the mandatory findings of significance.
- **Chapter 9, Alternatives.** This chapter provides a description of the alternatives to the project, including the No Project/No Development Alternative, No Project/General Plan Development Alternative, Site Location Alternative, and Reduced Footprint Alternative
- **Chapter 10, Mitigation Monitoring and Reporting Program.** This chapter identifies the significant project impacts and the mitigation measures required to reduce the 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.** This chapter lists all of the references cited in the EIR.
- **Chapter 12, Consultants and Agencies Consulted.** This chapter identifies all the consultants, agencies, and organizations responsible for the preparation of the EIR.

Technical Appendices

Technical studies prepared for the project have been summarized within the environmental issue sections in Chapter 5 and have been included in the appendices.

The technical reports prepared for the project are listed in the table of contents.

Incorporation by Reference

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

1.4 PUBLIC REVIEW PROCESS

The City, as 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 the opportunity to comment on the document, and the second stage is the Final EIR, which will be certified and considered by the decision maker when approving the project.

1.4.1 DRAFT EIR

In accordance with CEQA Guidelines Section 15105, this Draft EIR is distributed for review to public agencies, organizations, and the public for a review period of 45 days. The purpose of the review period is to allow the public agencies and 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” (CEQA Guidelines Section 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 public review period is posted on the notice of availability along with the location where the Draft EIR and all supporting technical studies and documents are available for review. An electronic copy of the Draft EIR and the technical appendices are posted on the City’s website at: www.sandiego.gov/ceqa/draft.

1.4.2 FINAL EIR

Comments addressing the scope and adequacy of the environmental analysis are solicited during the Draft EIR public review. Following the end of the public review period, the City, as the Lead Agency, provides written responses to all substantive comments received on the Draft EIR, per CEQA Guidelines Section 15088. All comments and responses are considered in the review of the EIR. Responses to the comments received during public review, any revisions to the Draft EIR made in response to agency or public comments, and a mitigation monitoring and reporting program, is prepared and compiled as part of the Final EIR process. The Final EIR consists of the Draft EIR, comments received, responses from the City as lead agency, a list of persons and agencies commenting on the Draft EIR, and any other information added by the City for the project. Before the City can approve the project, it must first certify that the EIR has been completed in compliance with CEQA, that the decision maker has reviewed and considered the information in the EIR, and that the EIR reflects the independent judgment of the City. The decision maker would be required to adopt findings of fact, and a statement of overriding considerations for any impacts identified in the Draft EIR as significant and unmitigable (see PRC Section 21081).

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CHAPTER 2 ENVIRONMENTAL SETTING

This chapter provides a description of existing site conditions for the proposed Fairmount Avenue Fire Station 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 proposed project is located within the City of San Diego (City), in the City Heights area centrally located in the Mid-City area within the Ridgeview neighborhood (see Figure 2-1, Regional Location). The site occupies 1.28 acres of undeveloped vacant land (Accessor's Parcel Number [APN] 541-190-1600). The project site is located to the west of the Mid-City: Eastern Planning Area, to the north of the Southeastern San Diego Planning Area, to the east of the Greater Golden Hill and North Park Planning Areas, and to the south of the Mid-City: Normal Heights and Mid-City: Kensington-Talmadge Planning Areas. The geographical context for this project is defined by its location within the City Heights area of the Mid-City Communities Plan (City of San Diego 2015).

The site is bordered by Fairmount Avenue to the southwest, 47th Street to the north and east, and Chollas Creek and the Chollas Parkway Open Space to the northwest. The project site is located on the U.S. Geological Service (USGS) 7.5-minute National City quadrangle.

2.2 ENVIRONMENTAL SETTING

2.2.1 PROJECT SITE LAND USES

The project site is currently vacant and undeveloped, as shown on Figure 2-2, Project Site. Overhead electrical poles are located along 47th Street adjacent to the project site. The site is primarily characterized by undeveloped land that gently slopes down to a flat basin bottom from the north, east, and south, with steep hillsides on the east side. There are a variety of native and non-native vegetation types present on the site, including coastal sage scrub, mixed chaparral, and a small area of disturbed habitat. There are no trees or streams on the site. For more information on vegetation on site, see section 5.4, Biological Resources.

The elevation within the project site ranges from 194 feet amsl in the southeast to 140 feet amsl in the northwest (Appendix F.2). Over 40% of the site has a slope gradient that exceeds 25%.

The site falls within the Multi-Habitat Planning Area (MHPA), a subset of the City's adopted Multiple Species Subarea Plan. The project is not within the Coastal Zone. The San Diego County Soil Survey identified two different soil types within the project site: made land and Huerohuero loam.

2.2.2 SURROUNDING ENVIRONMENT

The project site is strategically located to enhance emergency and medical response services for the surrounding community. Situated approximately 0.5 miles east of Interstate 805 and 0.5 miles north of Highway 94, north of the intersection of 47th Street and Fairmount Avenue, on the west side of 47th Street, as shown on Figure 2-2. The area is defined by geographical features, with Fairmount Avenue to the southwest, 47th Street serving as the northern and eastern boundaries, and the natural expanse of Chollas Creek and the Chollas Parkway Open Space to the northwest.

The land uses in the vicinity are characterized by a diverse mix of residential developments to the east and north, open spaces to the south, north and west, and an industrial area and a school situated farther to the south of the project site. Within close proximity, a trucking company operates approximately 300 feet to the southwest, while an elementary school is located about 450 feet to the southeast of the project site.

The existing land uses in the vicinity of the project site are reflective of the surrounding urban environment and include Leisureland mobile home park, an age-restricted development to the north, northeast, and single-family residential development to the east. Undeveloped open space lands are adjacent to the south and west intertwined with open space within a canyon to the west, providing a natural break in the developed landscape.

To the south of the project site, along 47th Street, lies an array of industrial areas, encompassing a FedEx Shipping Center, Sanwood Fine Carpentry and Construction Inc., and Antonio's Metal Works along Federal Boulevard.

The area immediately north of the project site consists of an undeveloped canyon (Chollas Parkway Open Space), providing a buffer between the project site and residential development farther to the north. The open space within this canyon serves as a recreational area for the community with trails along the arroyo.

West of the project site includes the undeveloped canyon bisected by an elevated portion of Fairmount Avenue. The canyon provides habitat for local wildlife, contributing to the ecological balance of the region. The project site is not located within a Fire Hazard Severity Zone (CAL FIRE 2025).

2.3 PLANNING CONTEXT

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

2.3.1 GENERAL PLAN

The City of San Diego's General Plan is comprised of 10 elements that provide a comprehensive slate of citywide policies for future growth and development (City of San Diego 2024a). In 2024 the City amended the General Plan (Blueprint San Diego) to address the adopted Climate Action Plan and the Regional Transportation Plan. The various elements of the General Plan include 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. The project site is designated Industrial Employment in the City's General Plan (see Figure 2-3, General Plan Land Use Designation) (City of San Diego 2024a).

2.3.2 MID-CITY COMMUNITIES PLAN

The project site is also located within the Mid-City Communities Plan (MCCP) Area which is centrally located in the San Diego metropolitan area, northeast of Centre City, south of Mission Valley, and west of the City of La Mesa. Mid-City consists of a cluster of four smaller communities: Normal Heights, Kensington-Talmadge, City Heights, and Eastern, each with its own distinctive character, and its own community planning group. As previously discussed in Section 2.1, the project site is located in the City Heights area. The MCCP planning area features a "grid" pattern and strip commercial development with gently rolling mesas divided by canyons on both the north and south edges of the community. Hills and canyons in the eastern portion of the community feed into the Chollas Parkway Open Space, which bisects the area from northeast to southwest (City of San Diego 2015). The City is currently in the process of updating the MCCP anticipated to be adopted in late 2026.

The MCCP sets forth goals, policies, and proposals to guide future development within the City Heights community. The Community Plan identifies issues and goals of the community with respect to land use, public facilities, urban design and environmental constraints.

The MCCP includes four elements the Neighborhoods Element, Natural and Cultural Resources Element, Public Facilities and Services Element, and the Transportation Element.

The MCCP provides land use designation maps of the four communities within the plan, including the City Heights area. As shown in the MCCP, the City Heights area generally includes land designated for residential, commercial, industrial, and open space. The project site is designated as Industrial in the MCCP (see Figure 2-4, Community Plan Land Use).

2.3.3 ZONING

As shown in Figure 2-5, Zoning, the project site is zoned OP-2-1 (Open Space) and RS-1-7 (Residential-Single Unit) in the City's Zoning Code (City of San Diego 2024b). The RS-1-7 zone allows for residential development of up to one dwelling unit for each 5,000 square feet of lot area. The OP-2-1 zone is the open space – park zone. This zone is applied to public parks and facilities in order to promote recreation and facilitate the implementation of land use plans. However, the City exempts all public services, such as a fire station, from complying with zoning regulations.

Airport Zones

The project site is within the Airport Influence Area for San Diego International Airport – Review Area 2, and the Airport Land Use Compatibility Overlay Zone, as described in Section 2.3.4 below.

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, vernal pools, non-coastal wetlands, coastal bluffs, or coastal beaches. However, the site does contain sensitive vegetation and potential steep hillsides. A portion of the site is located in a special flood hazard area designated as Zone AE. Zone AE designates a regulatory floodway area¹, which is attributed to Chollas Creek. The North Fork of the Chollas Creek crosses 300 feet northwest of the project site under Fairmount Avenue. The project site encroaches on the 100-year (Zone AE) and 500-year (Zone X) floodplains at the north corner of the project site (Appendix F.1).

2.3.4 REGIONAL PLANS

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

¹ According to FEMA, a Regulatory Floodway indicates that the channel of a river or other watercourse and the adjacent land areas that must be reserved in order to discharge the base flood without cumulatively increasing the water surface elevation more than a designated height.

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 most recently revised in 2022 (SDAPCD 2022). The San Diego Air Pollution Control District has 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 the reduction of emissions through regulatory controls. Development of the project site with a fire station has been anticipated in the local air quality plan and would be consistent with the RAQS. See Section 5.3, Air Quality, for further details.

Airport Land Use Compatibility Plan – San Diego International Airport – Review Area 2

The Airport Authority, which serves as the state-designated Airport Land Use Commission for San Diego County, adopts airport land use compatibility plans (ALUCPs). ALUCPs serve as a tool for the Airport Land Use Commission when conducting reviews of proposed land uses in areas surrounding airports. The plans also assist the city, as an affected local land use jurisdiction, in the preparation or amendment of land use plans and ordinances, including its General Plan.

The San Diego International Airport ALUCP provides guidance for future development and redevelopment in the area surrounding the airport. The project site is located within Review Area 2 of the Airport Influence Area, according to the San Diego International ALUCP. Review Area 2 consists of locations beyond Review Area 1 but within the airspace protection and/or overflight notification area. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land use within Review Area 2. Within Review Area 2 building heights are limited to 200 feet above ground level. The proposed building would be a maximum of 64 feet above grade, which would be within the allowable height limits provided in the San Diego International Airport ALUCP (San Diego County Regional Airport Authority 2025).

Water Quality Control Plan for the San Diego Basin

The U.S. Environmental Protection Agency has delegated responsibility for the 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 (NPDES) program. The NPDES program is a set of permits designed to implement the Clean Water Act that apply to various activities that generate pollutants with the 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. The project would be required to comply with the Basin Plan and the NPDES requirements to protect water quality.

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, and the project site is within the City of San Diego's MSCP Subarea Plan (SAP). The SAP has been prepared to meet the requirements of the California Natural Communities Conservation Planning (NCCP) Act of 1992. This subarea encompasses 206,124 acres and is generally characterized by urban land. Within the City's MSCP Subarea Plan, a largely contiguous, habitat baseline area or MHPA of approximately 60,000 acres was identified. 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 proposed project site is located outside of these habitat linkages and core areas, with the nearest MHPA boundary located approximately 0.08 miles from the project site.

San Diego Forward – Regional Plan

Every 4 years, SANDAG prepares a Regional Plan in collaboration with the 18 cities and 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 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. The project's consistency with the Regional Plan is addressed in Section 5.1, Land Use.

Climate Action Plan

Pursuant to Executive Order S-3-05 and Assembly Bill (AB) 32 that set greenhouse gas (GHG) reduction targets, as well as the California Air Resources Board (CARB) Scoping Plan, the City recently adopted an update to its Climate Action Plan (CAP) (City of San Diego 2022a). The City also adopted new CAP Consistency Regulations (Ordinance O-21528) as the new GHG threshold (City of San Diego 2022b). 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). Projects that are consistent with the CAP would result in a less-than-significant cumulative impact regarding GHG emissions. Projects that are inconsistent with the CAP must prepare a comprehensive project-specific analysis of GHG emissions including quantification of existing and projected GHG emissions and incorporation of measures from the CAP Consistency Regulations, to the extent feasible. Cumulative GHG 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 (City of San Diego 2022a). The project's consistency with the CAP is addressed in Sections 5.3, Air Quality and 5.7, Greenhouse Gas Emissions.

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SOURCE: RRM Design 2024; SANGIS 2023, 2024

FIGURE 2-2
Project Site
 Fairmount Avenue Fire Station

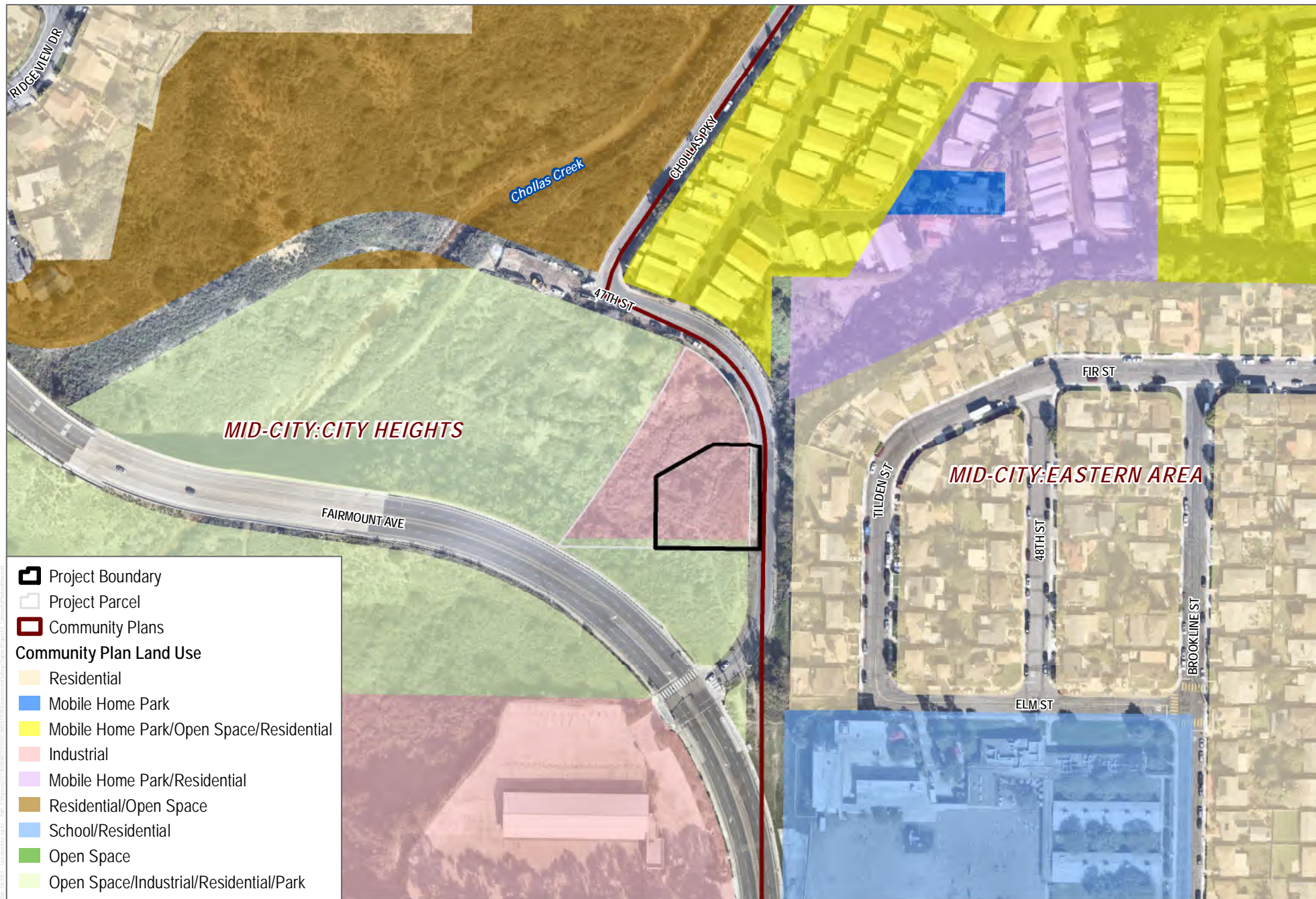
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SOURCE: RRM Design 2024; SANGIS 2023, 2024

FIGURE 2-3
General Plan Land Use
 Fairmount Avenue Fire Station

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SOURCE: RRM Design 2024; City San Diego CPLU; SANGIS 2023, 2024

FIGURE 2-4
Community Plan Land Use
Fairmount Avenue Fire Station

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SOURCE: RRM Design 2024; SANGIS 2023, 2024

FIGURE 2-5

Zoning

Fairmount Avenue Fire Station

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CHAPTER 3 PROJECT DESCRIPTION

This chapter provides a statement of project goals and objectives, describes the specific characteristics of the proposed Fairmount Avenue Fire Station Project (project), discusses project construction and operation, 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 (CEQA) Guidelines.

3.1 PROJECT OBJECTIVES

The following are the objectives of the project:

1. Increase the current and future capacity of the San Diego Fire Department by constructing a new fire station to serve the eastern portion of its service area.
2. Meet the San Diego Fire Department's 7-minute and 30-second response time to the eastern portion of the service area that is currently underserved.
3. Obtain a site large enough to accommodate a new fire station, free of constraints including flooding, toxic contaminants, and power lines, in an area with limited traffic.
4. Provide a cohesive design that is compatible in use, scale, and character with the surroundings.
5. Integrate the project into the existing topography of the site in a manner that reduces the grading footprint as well as impacts to environmental resources.

3.2 PROJECT COMPONENTS

The project proposes the construction of a 22,443 square-foot four-story fire station on a 1.28-acre site situated atop a canyon west of 47th Street in the City of San Diego (City). The proposed fire station building and required brush management area would be located on approximately 0.59 acres in the southeast portion of the site (see Figure 3-1, Project Site Plan). Access to the site would be from 47th Street, which borders the site to the east. The fire station features one garage and two apparatus bays (approximately 5,200SF), an exercise room, a kitchen, and 10 bunk rooms. The project also includes a 15-stall parking lot, a trash enclosure, an emergency generator, and a 1,000-gallon diesel fuel tank (see Figure 3-1). Construction would require vegetation removal, slope recontouring, and grading to create a level pad. Each project component is described below.

3.2.1 BUILDING AND SITE DESIGN

The proposed building includes a concrete and steel structural design with a series of free-standing and building-integrated retaining walls with several terraces. The architectural style of the building

would be modern, with concrete, metal panels, composite panels, and curtain wall glass (Figure 3-2, Project Rendering). The primary terrace would overhang the two proposed apparatus bays.

To minimize site grading and to incorporate the existing site topography, a portion of the building would be constructed using the existing hillside (see Figure 3-2). This would be the basement level, which would include the main lobby and shift office (962 SF). The second floor (6,857 SF) would contain a double-wide deep garage for fire apparatus parking, an operational support shop, and storage and cleaning facilities. The fitness and support rooms would be located on the third floor (3,824 SF). The fourth floor (6,595 SF) would contain 10 firefighter bunk rooms, a living area, a kitchen, and restrooms. In total, the proposed building would be 22,443 SF and 64 feet tall. This station would house an engine, a truck, and an ambulance (or two engines and an ambulance).

The project site is designated Industrial Employment in the City's General Plan (City of San Diego 2024a). The majority of the site is zoned Residential-Single Unit (RS-1-7), with a small area zoned Open Space-Park (OP-2-1) (City of San Diego 2024b). Implementation of the project would deviate from the RS-1-7 zoning related to building height and retaining wall height, although, as mentioned below, the project is not subject to compliance with the City's zoning requirements. However, to the extent possible the project has been designed consistent with the underlying zoning. As shown in Figures 3-3a through 3-3d, Elevations, the proposed building would be a maximum of 64 feet above grade, which would exceed the maximum allowed height of 35 feet above grade under the RS-1-7 zoning designation. Likewise, the project's proposed retaining walls would be 25 feet above grade, which would exceed the maximum allowed height of 6 feet above grade. While these proposed project elements exceed the maximum allowable height according to the RS-1-7 zoning, the project would not be required to request a deviation from the City's Municipal Code because all public services, such as a fire station, are exempt from the City's zoning regulations.

3.2.2 PARKING AND ACCESS IMPROVEMENTS

Access to the project site would be provided via one standard driveway off 47th Street to accommodate passenger vehicles, and one larger driveway connected to the apparatus bay, also off 47th Street, to accommodate fire vehicles and equipment. Both vehicle access points are located on the east side of the project site. The passenger vehicle parking lot would be located under the building overhang and would contain a total of 15 parking stalls, including two visitor stalls. Two of the 15 stalls would be Americans with Disabilities (ADA) accessible spaces (one for staff and one for visitors), and two would provide access to electrical vehicle charging hookups. For security purposes, the two visitor stalls near the driveway off 47th Street would be separated from the employee parking stalls via a security gate.

Pedestrian access would be provided via a new crosswalk across 47th Street that would connect to an existing sidewalk along the east side of 47th Street. While the City's Municipal Code does not require bicycle parking, the project would provide two short-term parking spaces via a bike rack located near the fire station's visitor entrance.

A new 22-foot-wide driveway apron will be constructed at the project entrance to the visitor and employee parking off 47th Street, as well as a new 40-foot-wide driveway apron at the entrance to the apparatus bays off 47th Street. In addition, the project would construct a new crosswalk, a concrete curb cut, and a new power pole along 47th Street. Driveway and curb improvements would occur on the 47th Street right-of-way (0.08-acre).

3.2.3 LANDSCAPING, BRUSH MANAGEMENT, AND REVEGETATION

Landscaping

The project's landscape plan is illustrated in Figure 3-4, Landscape Plan. The primary goal of the landscape design is to enhance the character of the building with drought-adapted native vegetation that requires minimal maintenance and irrigation needs. Approximately 6,049 SF of the project site would be landscaped. The proposed landscape plan would include drought-tolerant native vegetation and low-water use plants. The landscape scheme would include shrubs of varying heights, a wide selection of cacti and succulents, as well as three (3) shade trees. Native vegetation, including California Sagebrush and California Encelia, would be used to revegetate graded areas. The proposed landscaping plan has been designed in accordance with the City's Municipal Code Section 142.0402, Land Development Manual, Landscape Standards, and other applicable city and regional standards for landscape installation and maintenance as identified in the City's Design Guidelines. A detailed landscape plan and plant palette would be submitted to the Environmental Designee for review and approval prior to the issuance of building permits. As required through conditions of approval, no highly flammable plant species shall be allowed within the project's landscaping plan.

Brush Management

The City's Land Development Manual and Municipal Code include requirements for brush management for fire safety in areas with structures that are within 100 feet of any highly flammable area of native or naturalized vegetation. The project site is located adjacent to undeveloped land to the north, south, and west that contains native and non-native vegetation. Fire hazard conditions currently exist in the areas to the north, west, and east of the project site. The project would implement the City's Brush Management Regulations found in Section 142.0412 of the Land Development Code, which establishes a means of providing fire safety in the landscape. The brush management plan is shown in Figure 3-5, Brush Management Plan.

Two distinct brush management areas, referred to as “Zone One” and “Zone Two,” reduce fire hazards around structures by providing an effective fire break and contiguous areas of native or naturalized vegetation. Brush management Zone One is the area adjacent to the proposed fire station and shall be the least flammable. It shall consist of pavement and permanently irrigated ornamental planting and tree canopies no closer than 10 feet from the fire station. Brush management Zone One shall not be allowed on slopes with a gradient greater than 4:1. Brush management Zone Two is the area between Zone One and any area of native or naturalized vegetation and would consist of thinned, native, or naturalized non-irrigated vegetation. As shown on the project’s landscape plan (see Figure 3-5), Zone One is 10 feet in width and contains an added 6-foot-tall firewall constructed of masonry block. Zone Two currently consists of coastal sage scrub/mixed chaparral and riparian forest. Brush management activities are prohibited within coastal sage scrub, maritime succulent scrub, and coastal sage-chaparral habitats from March 1 through August 15, except when documented to the satisfaction of the City manager that the thinning would be consistent with conditions of species coverage described in the City of San Diego’s Multiple Species Conservation Program (MSCP) subarea plan. Management and maintenance of brush management zones in areas adjacent to the project site would be the responsibility of the San Diego Fire-Rescue Department (SDFD) and shall be completed in accordance with the City’s Land Development Manual and Municipal Code.

Revegetation

The City’s Municipal Code includes the Land Development Manual Landscape Standards and Landscape Regulations, which comprise the regulations, guidelines, and criteria for both public and private projects for landscaping and revegetation. The project would be consistent with the Permanent Revegetation requirements of the Landscape Standards, which prescribe revegetation of disturbed areas adjacent to native vegetation to restore native and naturalized vegetation types into the surrounding existing landscape to provide visual and horticultural compatibility with the indigenous native plant materials. Revegetation areas consist of the areas disturbed by the project. The proposed revegetation plants primarily consist of coastal sage scrub, included in an ornamental native and erosion control hydroseed mix. Hydroseeding of disturbed areas with a mixture of native shrubs would provide surface cover and erosion control. No brush management would occur within the City’s MHPA.

3.2.4 UTILITIES

The project includes various utility improvements including water, wastewater, storm drainage and dry utilities. The project’s water system, wastewater system, and dry utilities are described in more detail below.

Water System

The project would tie into the City's existing 8-inch water main located within 47th Street as required by the City's Public Utilities Department (PUD). On-site domestic and irrigation water would be provided by a 2-inch water service line and meter, along with a 2.5-inch Reduced Pressure Backflow Device. Fire service would be equipped with a 6-inch water service line and a 6-inch Reduced Pressure Backflow Device and Lateral.

Wastewater System

An existing 8-inch sanitary sewer line is located within 47th Street. The project would connect to the existing infrastructure via two new sewer lines, a 6-inch lateral and a clarifier for the fire station, and a separate sewer line for the trash enclosure drain.

Wastewater collection and the City's sewage system are maintained and operated by PUD to ensure sufficient capacity is available for dry weather conditions and storm or wet weather peak-flow events.

Storm Drain System

The project site includes an existing storm drain originating from 47th Street that daylights at the bottom of the site slope and drains offsite. The proposed project would route all stormwater runoff into an on-site biofiltration system and then into an underground detention system. The underground detention system would discharge into an existing 18-inch storm drainpipe located adjacent to 47th Street near the northeast corner of the site. Stormwater flows would be maintained at pre-development rates.

Other 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 proposed project. An emergency generator would be provided along with a generator enclosure to reduce sound. The emergency generator would be located just northeast of the fire station along with a 1,000-gallon diesel fuel tank, as shown in Figure 3-1.

3.2.5 SIGNAGE, LIGHTING AND WALLS

Project signage would be installed at the project entrance, identifying it as the "Fairmount Avenue Fire Station" (see Figure 3-2, Project Rendering).

To reduce the grading footprint, a retaining wall surrounding the proposed fire station would be included. The wall would be 555 feet long with a maximum height of 25 feet. The wall would include an etched stone surface to provide a more natural look (as shown in Figure 3-3a).

Onsite lighting would include building lights that would meet the state's building code and the City's lighting standards. These lights would be shielded and downward focused to avoid light spillover.

3.2.6 SUSTAINABILITY FEATURES

The project would be required to comply with the 2022 California Green Building standards (CALGreen), which would substantially improve energy and water conservation, as well as operational efficiency. As part of the project design, the project would include the following sustainability elements:

- Two Electric Vehicle (EV) charging stations.
- Bike racks
- On-site staff showers
- Solar Ready Design. The proposed building would be equipped with solar-ready design features, such as roof orientation, slope, and load-bearing capacity as well as conduit and electrical panel space, that would facilitate and optimize the installation of a rooftop solar photovoltaic (PV) system, following construction of the building. PV installation would require separate approvals and permits not included in the proposed project.

3.2.7 GRADING AND CONSTRUCTION

Construction of the project is anticipated to take approximately 34 months, beginning in Fall 2026 and ending in early Summer 2029. Construction would include ground clearing, grading, and foundation preparation, utility installation/trenching, framing and assembly of the building and associated apparatus bays, paving of parking and driveway areas, and landscaping. The project is assumed to be constructed in one phase and based on the following assumptions (durations are approximate):

- Site Preparation – 20 days
- Grading – 9 months
- Building construction– 12 months
- Paving – 20 days
- Architectural Coating – 10 days

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

The construction equipment mix used for estimating the construction emissions of the proposed project is based CalEEMod default values per construction phase and is shown in Table 3-1. No blasting or drilling equipment would be required for project construction.

Table 3-1
Anticipated Construction Equipment

Construction Phase	One-Way Vehicle Trips			Equipment		
	<i>Average Daily Worker Trips</i>	<i>Average Daily Vendor Truck Trips</i>	<i>Total Haul Truck Trips</i>	<i>Equipment Type</i>	<i>Quantity</i>	<i>Usage Hours</i>
Site Preparation	6	2	2	Graders	1	8
				Tractors/Loaders/Backhoes	1	8
Grading	12	4	8	Graders	1	6
				Rubber Tired Dozers	1	6
				Tractors/Loaders/Backhoes	1	7
Site Preparation	6	2	2	Graders	1	8
				Tractors/loaders/backhoes	1	8
Grading	12	4	8	Graders	1	6
				Rubber-tired dozers	1	6
				Tractors/loaders/backhoes	1	7
Building Construction	30	6	0	Cranes	1	4
				Forklifts	2	6
				Tractors/loaders/backhoes	2	8

Source: Appendix C.

During construction activities, construction equipment and materials would be staged on-site and at an off-site location, approximately 0.40 miles southwest of the project site. The 0.52-acre off-site staging area is a City-owned property located adjacent to Sunshine Berardini Park and Federal Boulevard (see Figure 3-6, Off-site Construction Staging). During construction, a minimum of 90% of the inert waste (material not subject to decomposition such as concrete, rock, dirt, brick, etc.) and 65% of the remaining construction debris generated by the project would be diverted to a recycling

facility, consistent with the City's Construction and Demolition (C&D) Debris Diversion Deposit Program (City of San Diego 2021).

Approximately 0.45 acres (34.7% of the total project site) of the 0.59-acre project footprint would be graded to accommodate the proposed development. The 0.59-acre project footprint consists of 0.33-acres of steep slopes considered Environmentally Sensitive Lands per the City's Municipal Code (Chapter 14, Article 3, Division 1, Environmentally Sensitive Lands Regulations), which represents approximately 61% of the total 0.51-acres of the existing steep slopes on the entire project site.

Overall grading would require an estimated 1,607 cubic yards (CY) of cut and 5,392 CY of fill, resulting in a net export of 3,785 CY of soil, with a maximum excavation depth of 20 feet. Soil export is expected to be taken to either Hanson Aggregates West – Miramar (9229 Harris Plant Road), Moody's (3210 Oceanside Boulevard) or Terra Bella Nursery (302 Hollister Street). The maximum height of fill slopes would be approximately 7 feet.

Graded slopes would be revegetated in compliance with the project's Landscape Development Plan, in compliance with Section 142.0411 of the City's Municipal Code, Section III of the Steep Hillside Guidelines in the Land Development Manual, and other applicable City requirements.

3.2.8 OPERATION

The fire station would support a total of 12 firefighters and rescue staff (two (2) crews of four (4) firefighters and one (1) ambulance crew of two (2)). The firefighters work 24-hour shifts, and the ambulance crew works either 12 or 24-hour shifts per day. When a call is received, and fire trucks are dispatched, vehicles would exit onto 47th Street and head south to the intersection of 47th Street and Fairmount Avenue. The signal at the 47th Street and Fairmount Avenue intersection would be controlled by the engine operator so all vehicles would be required to stop to allow access.

Sirens would not be activated unless necessary to warn other vehicles, pedestrians or bicycles in the area. Emergency vehicle siren noise for the fire trucks is exempt per Section 59.5.0402 (b) of the Municipal Code. However, fire station personnel follow the San Diego Fire Department Operations Manual and California Vehicle Code for emergency vehicles and would responsibly operate the siren and emergency lights subject to the driver's discretion and based on traffic conditions and safety when leaving the station, as is commonly done when fire stations are located near residential areas or other noise sensitive area locations.

3.3 APPROVALS

The project is anticipated to require the following approvals and discretionary actions from the City and other agencies, which would be processed prior to construction:

- Contract Award for Design and Construction
- Regional Water Quality Control Board (RWQCB) Dewatering Permit
- Right of Entry permits (if needed)
- Site Development Permit (SDP)
- Construction Permit (Building and Retaining Wall)

All applicable laws, regulations, and local standards, including but not limited to the latest City of San Diego Municipal Code, Land Development Manual, Storm Water Construction General Permit, and Standard Specifications for Public Works Construction (Whitebook) would apply at the time of the above contract award and building permitting.

The project includes avoidance measures that are conditions of the SDP the City has developed to ensure compliance with the City's Biology Guidelines and MSCP. While avoidance and resource protection measures are not considered mitigation measures, applicable City avoidance measures for the project are listed below to ensure compliance and clearly outline City requirements.

AM-BIO-1a Measures Prior to Construction

- A. Biologist Verification:** The Engineering & Capital Project Department shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2018), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.
- B. Preconstruction Meeting:** The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.
- C. Biological Documents:** The Qualified Biologist shall submit all required documentation to the MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally

Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.

- D. BCME:** The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME) which includes the biological documents listed in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.
- E. Avian Protection Requirements:** To avoid any direct impacts to the least Bell's vireo, Cooper Hawk, and yellow warbler, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds within the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The survey area shall cover the limits of disturbance and 300 feet from the area of disturbance. The results of the pre-construction survey shall be submitted to MMC for review and approval prior to initiating any construction activities. If nesting least Bell's vireo, Cooper Hawk, and yellow warbler are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable state and federal laws (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 the least Bell's vireo, Cooper Hawk, and yellow warbler or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City DSD for review and approval and implemented to the satisfaction of the City. The City's MMC and Qualified Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction.

- F. Resource Delineation:** Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions, as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including least Bell's vireo, Cooper Hawk, and yellow warbler) during construction. Appropriate steps/care shall be taken to minimize attraction of nest predators to the site.
- G. Education:** Prior to commencement of construction activities, the Qualified Biologist shall meet with the project contractor and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

AM-BIO-1b Measures During Construction

- A. Monitoring:** All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSV). The CSV shall be e-mailed to the MMC on the 1st day of monitoring, the 1st week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.
- B. Subsequent Resource Identification:** The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna on site (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state, or federal regulations have been determined and applied by the Qualified Biologist.

AM-BIO-1c. Post Construction Measures

Follow-Up Reporting: In the event impacts exceed previously identified acreage amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP,

CEQA, and other applicable local, state, and federal laws. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City MMC within 30 days of construction completion.

AM-BIO-2 LUAG Compliance Measures

Coastal California gnatcatcher: Prior to construction, the City's Environmental Designee (ED) or Mitigation Monitoring and Coordination (MMC) staff shall verify that the MHPA boundaries and the project requirements regarding the California gnatcatcher, specified as follows, are shown on the construction plans.

No clearing, grubbing, grading, or other construction activities shall occur during the California gnatcatcher breeding season (March 1 to August 15), until the following requirements have been met to the satisfaction of the City's ED (or MMC staff):

1. Between March 1 and August 15, no clearing, grubbing, or grading of occupied California gnatcatcher habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; and
2. 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 California gnatcatcher habitat in 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 shall be completed by a Qualified Acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the MMC staff 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
3. At least 2 weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, temporary noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities shall not exceed 60 dB(a) hourly average at the edge of habitat occupied by the 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 Qualified Biologist, then the associated construction activities shall cease until such time that adequate noise

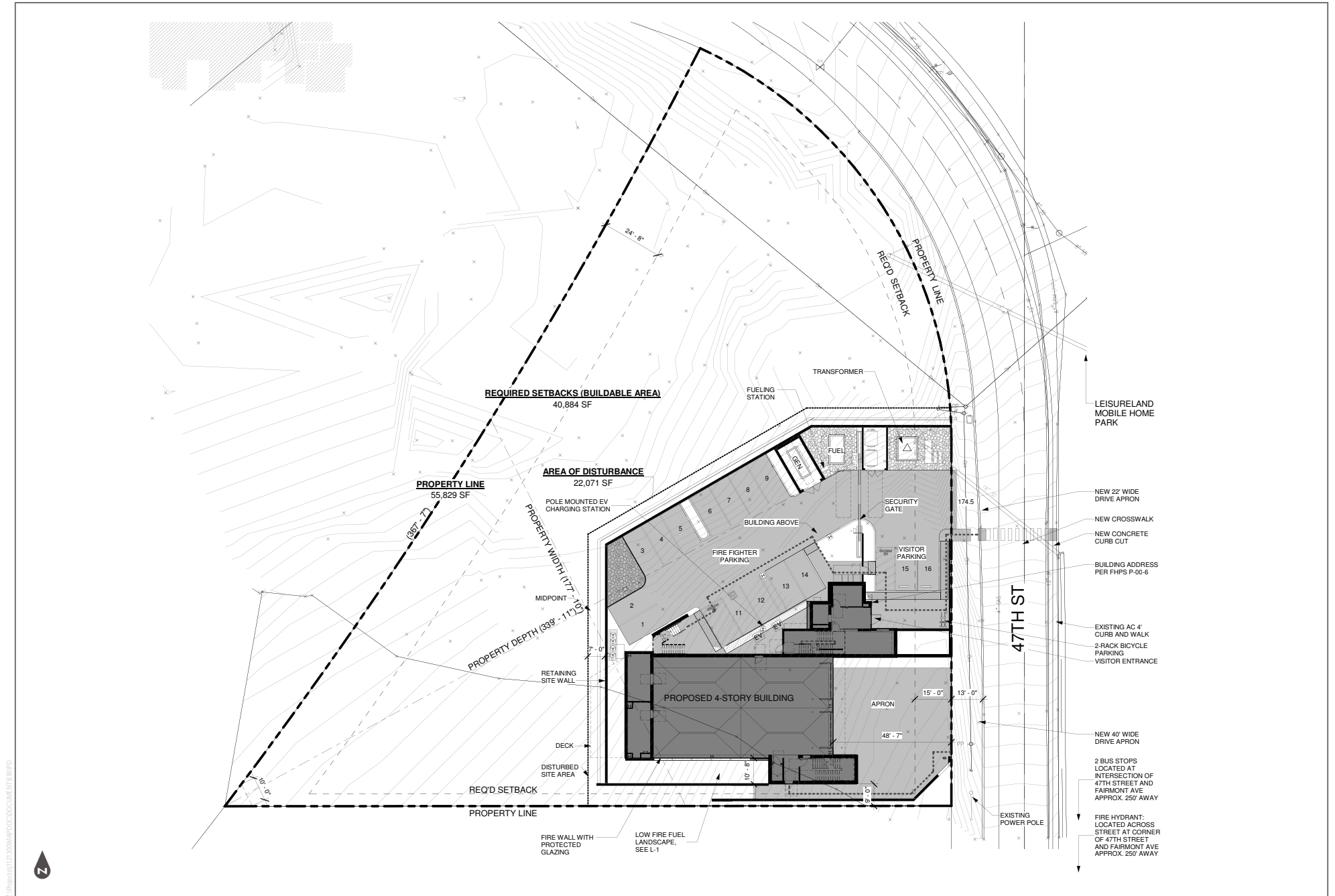
attenuation is achieved or until the end of the breeding season (August 16). Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained 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 Qualified Biologist and the MMC, 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.

4. Presence/absence of coastal California gnatcatchers shall be determined through protocol surveys conducted by a Qualified Biologist (possessing a valid Endangered Species Act Section 10 (a)(1)(A) Recovery Permit). If coastal California gnatcatchers are not detected during the protocol survey, the Qualified Biologist shall submit substantial evidence to MMC, U.S. Fish and Wildlife Service, and California Department of Fish and Wildlife staff that demonstrates whether or not measures, such as temporary noise attenuating walls, are necessary between March 1 and August 15 as follows:
 - a. If this evidence indicates the potential is high for coastal California gnatcatcher to be present based on historical records or site condition, then Condition 3 above shall be adhered to.
 - b. If this evidence concludes that no impacts to this species are anticipated, no measures would be necessary.

AM-BIO-3 Temporary Impact Revegetation

Temporary disturbance of 0.039 acre of Diegan coastal sage scrub within the off-site construction staging area shall be revegetated in accordance with the City of San Diego Landscape Standards included in the City's Land Development Manual. Habitat revegetation shall feature native species that are typical of the area, and erosion control features shall include silt fence and straw fiber rolls, where appropriate (e.g., in areas where sheet flow during rain events may cause erosion). The revegetation areas shall be monitored and maintained for a minimum of 25 months to ensure adequate establishment and sustainability of the plantings/seedlings to reduce the risk of erosion and/or non-native, invasive plant species establishment, in accordance with the Landscape Standards in the City's Land Development Manual.

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SOURCE: City of San Diego 2024; RRM Design Group, 2024

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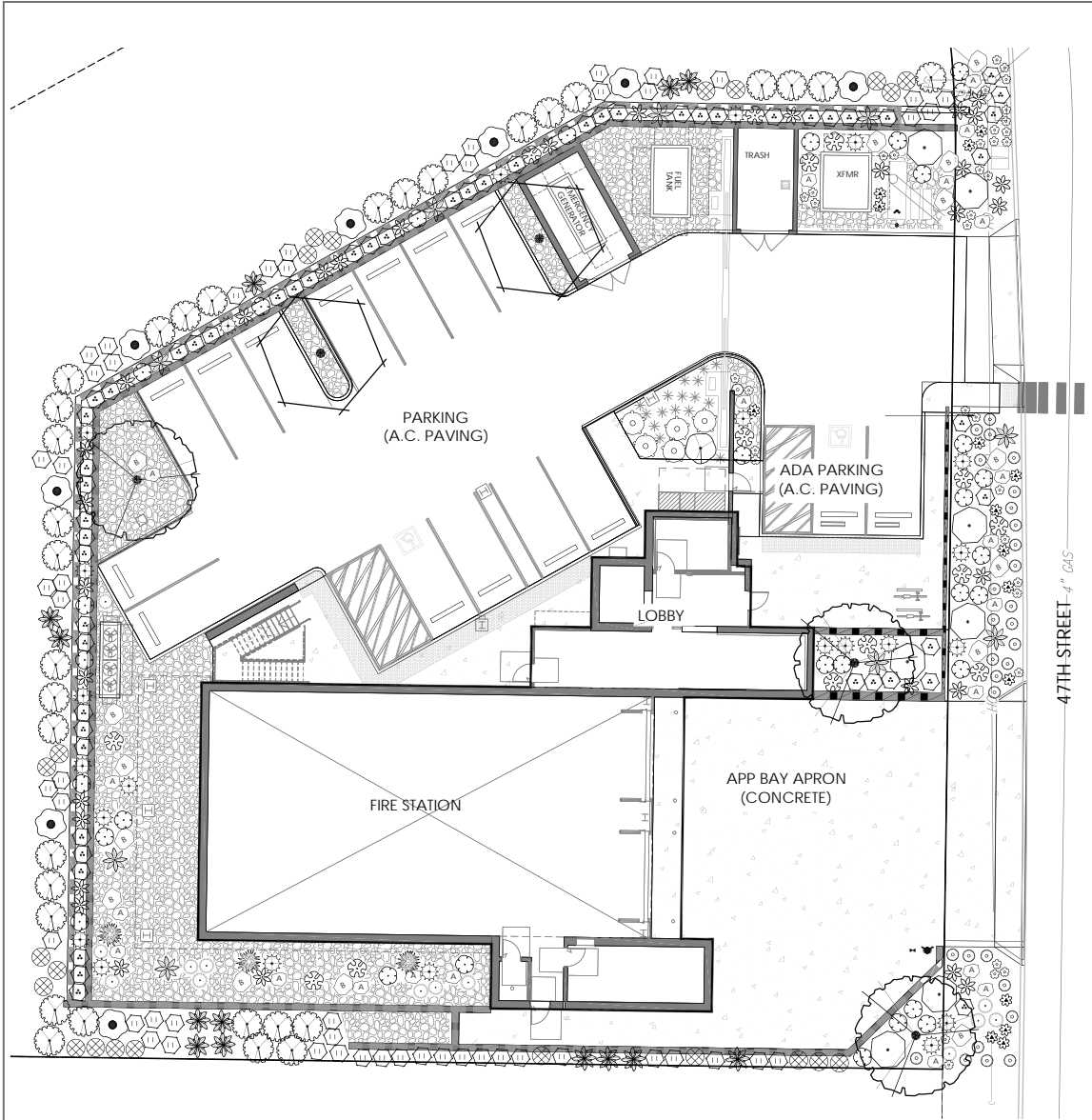
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SOURCE: City of San Diego 2024; RRM Design Group, 2024

FIGURE 3-3d
Elevation Rendering - West
Fairmount Avenue Fire Station

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PLANT SCHEDULE

TREES	QTY	BOTANICAL NAME	COMMON NAME	CONT	DETAIL
	2	CERCIDIMUM X 'DESERT MUSEUM'	STANDARD THORNLESS PALO VERDE	24"BOX	2/LP501
	3	CERCIDIMUM X 'DESERT MUSEUM'	MULTI-TRUNK THORNLESS PALO VERDE	36"BOX	2/LP501
SHRUBS	QTY	BOTANICAL NAME	COMMON NAME	CONT	DETAIL
	36	ACHILLEA X TAYGETAEA	YARROW	5 GAL	2/LP501
	31	CISTUS X PURPUREUS 'BRILLIANCY'	BRILLIANCY ROCK ROSE	5 GAL	2/LP501
	16	DIANELLA CAERULEA 'VAREGATA'	BLUE FLAX LILY	5 GAL	2/LP501
	1	HETEROMELES ARBUTIFOLIA	TOYON	5 GAL	2/LP501
	55	LANTANA SELLOWIANA	TRAILING LANTANA	5 GAL	2/LP501
	5	MAHONIA REPENS	CREEPING MAHONIA	5 GAL	2/LP501
	7	ROMNEYA COULTERI	MATILIA POPPY	5 GAL	2/LP501
	30	VERBENA LILACINA 'DE LA MINA'	LILAC VERBENA	5 GAL	2/LP501
CACTUS/SUCCULENTS	QTY	BOTANICAL NAME	COMMON NAME	CONT	DETAIL
	31	AGAVE DESMETIANA 'VAREGATA'	VAREGATED DWARF CENTURY PLANT	5 GAL	2/LP501
	9	AGAVE VILMORINIANA	OCTOPUS AGAVE	5 GAL	2/LP501
	23	DASYLIRION WHEELERI	GREY DESERT SPOON	5 GAL	2/LP501
	15	DUDLEYA BRITTONII	DUDLEYA	5 GAL	2/LP501
	13	ECHINOCACTUS GRUSONII	GOLDEN BARREL CACTUS	5 GAL	2/LP501
	14	EUPHORBIA AMMAK 'VAREGATA'	VAREGATED CANDELABRA	15 GAL	2/LP501
	3	FOUQUIERIA SPLENDENS	OCOTILLO	15 GAL	2/LP501
REVEGETATION AREA	QTY	BOTANICAL NAME	COMMON NAME	CONT	DETAIL
	22	ARTEMISIA CALIFORNICA	CALIFORNIA SAGEBRUSH	5 GAL	2/LP501
	32	BACCHARIS PILULARIS	DWARF COYOTE BRUSH	5 GAL	2/LP501
	53	ENCELIA CALIFORNICA	CALIFORNIA ENCELIA	5 GAL	2/LP501
	13	SALVIA APIANA COMPACTA	COMPACT WHITE SAGE	5 GAL	2/LP501
	8	SALVIA MELLIFERA	BLACK SAGE	5 GAL	2/LP501
BOULDERS/COBBLE					
		4-8" COBBLE, SEE SPECIFICATIONS FOR COLOR AND TYPE			5/LP501
		24"-36" LANDSCAPE BOULDERS, SEE SPECIFICATIONS FOR COLOR AND TYPE			4/LP501

TREE SUBSTITUTION NOTE:
 Architect & client would prefer to use the *Cercidium x 'Desert Museum'* tree. It is an ideal 25' tall & wide deciduous up-right shade tree with yellow flowers. It has low water usage, is low maintenance and its year round interest compliments the site and architecture. If this tree is unacceptable, please substitute 24" box *Arbutus unedo*, Strawberry Tree

REFERENCE NOTES SCHEDULE

SYMBOL	12 SITE FURNISHINGS DESCRIPTION
	BIKE RACK, SEE SPECIFICATIONS.

SOURCE: City of San Diego 2024; RRM Design Group, 2024

FIGURE 3-4
 Landscape Plan
 Fairmount Avenue Fire Station

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BRUSH MANAGEMENT REQUIREMENTS (SDMC Section 142.0412)

Any property containing a habitable structure and native or naturalized vegetation is required to provide 100 feet of brush management in two distinct zones: Zone 1 and Zone 2. Special requirements may apply (i.e. pre-1989 development). Check with Fire-Rescue or DSD before you begin brush management work.

Brush Management **Zone 1** typically extends 35 feet out from the habitable structure towards flammable vegetation, and occurs on the level portion of a property.

- **Zone 1** must be maintained on a regular basis by thinning and pruning trees and plants, controlling weeds, and maintaining irrigation systems.
- No habitable structures are permitted. New construction (i.e. fences, walls, palapas, play structures, gazebos, and decks) must be non-combustible and/or have a minimum 1-hour fire resistance rating. Previously conforming structures (legally constructed prior to ordinance) may remain unless they constitute a distinct danger to life or property.
- Plants should be primarily low-growing (less than 4 feet in height), low-fuel, and fire-resistive.
- All portions of trees, other than the trunk, which extend within ten feet of a structure or the outlet of any chimney, must be cut back.
- Trees adjacent to or overhanging any building must be free of dead wood.
- Roof and rain gutters must be free of leaves, needles, or other dead vegetative growth.

Brush Management **Zone 2** is the remaining 65 feet that extends beyond Zone 1, typically comprised of undisturbed vegetation on a slope subject to sensitive biological resource protections.

- **Zone 2** must be maintained on a regular basis by controlling weeds and removing invasive species. (See back of Bulletin under additional information.)
- Selective thinning and pruning of native and non-native plants is required to reduce the fuel-load. Do not grade or grub native plants, soils or habitats. Non-native plants must be pruned before native plants. See detailed instructions provided in this Bulletin. Violators will be responsible for restoration and mitigation costs as applicable.
- Brush management activity is not allowed March 1 through August 15 in coastal sage scrub, maritime succulent scrub, or coastal sage-chaparral habitats, unless an exception is specifically granted.
- NO structures or permanent irrigation are allowed in Zone 2.
- A permit is required to re-vegetate or reconfigure Brush Management Zone 2. Failure to obtain the required permits could result in costly corrective action.

BRUSH MANAGEMENT METHOD:
THE DESIGN METHOD USED FOR THE BRUSH MANAGEMENT PLAN IS TO MINIMIZE SITE DISTURBANCE WHILE COMPLYING WITH CODE REGULATIONS. ZONE 1 IS 10' IN WIDTH WITH AN ADDED 6' FIRE WALL. ZONE 2 MEASURES AT 90' FOR A TOTAL DISTANCE OF 100' FROM THE STRUCTURE. ZONE 2 IS THE BRUSH MANAGEMENT AREA. THE EXISTING LANDSCAPE IN THIS AREA CONSISTS OF COASTAL SAGE SCRUB/MIXED CHAPARRAL & RIPARIAN FOREST TO REMAIN. BRUSH MANAGEMENT ACTIVITIES ARE PROHIBITED WITHIN COASTAL SAGE SCRUB, MARITIME SUCCULENT SCRUB, AND COASTAL SAGE-CHAPARRAL HABITATS FROM MARCH 1 THROUGH AUGUST 15, EXCEPT WHERE DOCUMENTED TO THE SATISFACTION OF THE CITY MANAGER THAT THE THINNING WOULD BE CONSISTENT WITH CONDITIONS OF SPECIES COVERAGE DESCRIBED IN THE CITY OF SAN DIEGO'S MSCP SUBAREA PLAN. BRUSH MANAGEMENT, PRUNING AND THINNING OF EXISTING SHRUBS, TREES AND GROUND COVER IN THE BRUSH MANAGEMENT AREA SHALL BE IN ACCORDANCE WITH SDMC SECTION 142.0412.

STRUCTURAL BUILDING ALTERNATIVE COMPLIANCE:
1-HR. MIN. FIRE RATED WALL, SEE ARCHITECTURAL FOR MORE INFORMATION. WALL SYSTEM CONSISTS OF: 14" THICK CONCRETE WALL; TGP SG CURTAINWALL 60 MIN. W/ PILKINGTON PYROSTOP 60 MIN. GLAZING OR SIM.: METAL PANEL RAIN SCREEN OVER (2) 5/8" TYPE X GYP. SHEATHING.

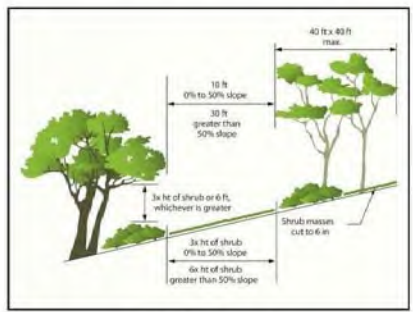
How to Selectively Thin and Prune Plants and Trees in Zone 2 and Avoid Clearing Sensitive Vegetation in Violation of the Code.

Step 1: Remove... as much dead wood as you can and invasive species within the Brush Management Zone areas.

Step 2: Thin... the entire Zone 2 area. Start by cutting down 50% of the plants over 2 feet in height to a height of 6 inches. Don't go any lower than 6 inches so the roots remain to control soil erosion. The goal is to create a "mosaic" or more natural look, as shown below, so do your cutting in a "staggered" pattern. Leave uncut plant groupings up to 400 square feet — that's a 20x20-foot area, or an area that can be encircled by an 80-foot rope — separated by groupings of plants cut down to 6 inches. Thinning should be prioritized as follows: 1) invasive non-native species; 2) non-native species; 3) flammable native species; 4) native species; and 5) regionally sensitive species.

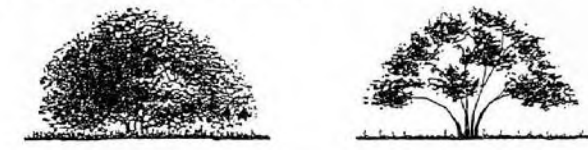


Step 3: Prune... all plants or plant groupings that are left after the thinning process to achieve the horizontal and vertical clearances shown in the illustration below. (For trees in Eucalyptus Woodlands areas, see FPB Policy B-08-1.)



Tree and Shrub Spacing

Remaining plants, 4 feet or more in height, should then be cut and shaped into "umbrellas." This means pruning one half of the lower branches to create umbrella-shaped canopies. This allows you to see and deal with what is growing underneath. Upper branches may then be shortened to reduce fuel load as long as the canopy is left intact. This keeps the plant healthy and the shade from the plant canopy reduces weed and plant growth underneath. Vegetation that is less than 4 feet in height, like coastal sage scrub, should be cut back to within 12 inches of the root crown.



Step 4: Dispose... of the cuttings and dead wood by either hauling it to a landfill; or by chipping/mulching it on-site and spreading it out in the Zone 2 area to a depth of not more than 6 inches.

Step 5: Thin and prune annually... because plants will grow back.

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SOURCE: RRM Design 2024; SANGIS 2023, 2024

FIGURE 3-6
Off-Site Construction Staging
Fairmount Avenue Fire Station

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CHAPTER 4 HISTORY OF PROJECT CHANGES

This chapter chronicles the physical changes that have been made to the project in response to revisions requested by City staff, as well as through the project review and refinement process. These changes are described below:

As part of the site selection process the City of San Diego Fire-Rescue Department (SDFD), Logistics Division evaluated the feasibility of siting the fire station on various properties within a specific geographic area that had a gap in service (e.g., extended emergency response times). As part of the review criteria the SDFD also coordinated with the Economic Development Department (formerly Department of Real Estate and Airport Management), and Engineering & Capital Projects Department. A total of 10 sites were identified but six were eliminated due to a variety of reasons including location within a 100-year floodplain and noise concerns due to proximity to a police department gun range and Highway 94. The remaining four sites were screened for potential purchase and development as a fire station. The four primary sites included:

- 4029/4070 Home Avenue (APNs 541-241-01-00; 540-495-01-00; 540-495-04-00)
- Beech and 38th Street (APN 540-492-15-00)
- Home and Fairmount Avenue (northeast corner) (APN 476-572-12-01)
- 47th and Fairmount Avenue (APN 541-190-16)

Of the four primary sites, two were ruled out because they were not available for purchase and the third was ruled out because of its low site valuation. The proposed project site (47th and Fairmount Avenue) was selected because it met the size criteria and was available for purchase. It was also determined that the site's buildable space met the SDFD's requirements (approximately 34,000 square feet or 0.78 acre). Additionally, the project site is designated Industrial Employment in the City's General Plan (2024) and Industrial in the MCCC (2015) which allows development of a fire station. The lack of vacant available land in the neighborhood contributed to the need to acquire the property as a fire station for this underserved area in the City and meet established emergency response targets.

The City hired RRM Design Group to develop a building design that met the operational objectives and responded to the site conditions. The design team identified several site layout options while studies were underway to identify any existing underlying site constraints such as unstable soils, topography, presence of protected biological or cultural resources, and potential for flooding or inadequate drainage. The City evaluated the site limitations and decided on the proposed site configuration. The final site plan was based, in part on the presence of wetland resources located in the lower half of the site and the need to avoid potentially sensitive biological areas. Although the selected site option resulted in more development requirements due to the steepness of this portion of the site it was determined this was the best site design and location of the building on the site.

The selected site option proceeded through the City's site development review process and was modified to address comments. In addition, the site plan was further modified based on concerns received from the adjacent residents. This included but was not limited to providing better utility access and siting; site vehicular view angle to ensure a safe line of sight; noise concerns due to an on-site generator and potential siren noise; public site access; wild-fire safety analysis and building/site refinements; on-site tree planting; and other refinements.

CHAPTER 5 ENVIRONMENTAL ANALYSIS

The following sections analyze the potential environmental impacts that may occur as a result of implementation of the proposed Fairmount Avenue Fire Station Project (project). Each issue analysis section includes a description of existing conditions, the criteria for the determination of impact significance, evaluation of potential project impacts including 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 and Odor
- Biological Resources
- Energy
- Geologic Conditions
- Greenhouse Gas Emissions
- Health and Safety
- Hydrology
- Noise
- Paleontological Resources
- Historic Resources
- 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 Fairmount Avenue Fire Station Project (project) site, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if applicable, related to implementation of the project.

The discussion in this section is based on a review of the City of San Diego General Plan (City of San Diego 2024a), Mid-City Communities Plan (MCCP) (City of San Diego 2015), City of San Diego Climate Action Plan (CAP) (City of San Diego 2022a), City of San Diego Multiple Species Conservation Program Subarea Plan (MSCP) (City of San Diego 1997), San Diego Association of Governments (SANDAG) San Diego Forward: The Regional Plan (SANDAG 2021), and the San Diego International Airport Land Use Compatibility Plan (ALUCP) (San Diego County Regional Airport Authority 2025).

5.1.1 EXISTING CONDITIONS

Existing Physical Conditions

The 1.28-acre project site is currently vacant and undeveloped with no existing buildings or structures. In addition, there are no trees or streams on the site. The site is primarily characterized by undeveloped land which gently slopes down to a flat basin bottom along the north, east, and south, with steep hillsides on the east side. The site includes a variety of native and non-native vegetation types primarily consisting of coastal sage scrub and mixed chaparral, with a small area of disturbed land also present.

Surrounding Land Uses and Setting

The project site is strategically located to enhance emergency and medical response services for the surrounding community. Situated approximately 0.5 miles east of I-805 and 0.5 miles north of Highway 94, north of the intersection of 47th Street and Fairmount Avenue, on the west side of 47th Street, as shown on Figure 2-2 in Chapter 2, Existing Conditions. The area is defined by geographical features, with Fairmount Avenue to the southwest, 47th Street serving as the northern and eastern boundaries, and the natural expanse of Chollas Creek and the Chollas Parkway Open Space to the northwest.

The existing land uses in the vicinity of the project site are reflective of the surrounding urban environment and include Leisureland mobile home park an age-restricted development to the north, northeast, and single-family residential development to the east. To the south of the project site, along 47th Street, is an industrial area, encompassing a FedEx Shipping Center, Sanwood Fine

Carpentry and Construction Inc., and Antonio's Metal Works along Federal Boulevard. An elementary school is located about 450 feet to the southeast of the project site.

Undeveloped open space lands (Chollas Parkway Open Space) are adjacent to the northwest, south, and west of the project site providing a natural break in the developed landscape. Farther west of the site includes an undeveloped canyon bisected by an elevated portion of Fairmount Avenue. The open space within this canyon and the Chollas Parkway Open Space serves as a recreational area for the community with trails along the arroyo.

The project site and its immediate surrounding area is within the City Heights Ridgeview neighborhood within the MCCP. The neighborhood is delineated by I-805 to the west, Highway 94 to the south, Home Avenue to the north, and Euclid Avenue to the east and northeast. The project site is located to the west of the Mid-City: Eastern Planning Area, to the north of the Southeastern San Diego Planning Area, to the east of the Greater Golden Hill and North Park Planning Areas, and to the south of the Mid-City: Normal Heights and Mid-City: Kensington-Talmadge Planning Areas (City of San Diego 2015).

The project site is within the City of San Diego Subarea Plan of the MSCP. The project site is located outside of the Multi-Habitat Planning Area (MHPA) defined in the City's MSCP Subarea Plan. The project site and construction staging area are located directly adjacent to the City's MHPA. A small portion of the proposed Zone 2 Brush Management Area overlaps the MHPA (Appendix D).

Land Use Designations and Zoning

The project site is designated Industrial Employment in the City's General Plan (see Figure 2-3, General Plan Land Use Designation in Chapter 2) (City of San Diego 2024a). As previously mentioned, the project site is also within the MCCP and is designated as Industrial (see Figure 2-4, MCCP Land Use in Chapter 2) (City of San Diego 2015).

The majority of the project site is zoned RS-1-7 (Residential-Single Unit) with a small area zoned OP-2-1 (Open Space) (see Figure 2-5, Zoning in Chapter 2) (City of San Diego 2008). The RS-1-7 zone allows for residential development of up to one dwelling unit for each 5,000 square feet of lot area. The OP-2-1 zone is open space – park zone. This zone is applied to public parks and facilities in order to promote recreation and facilitate the implementation of land use plans. However, the City has a process to exempt all public facilities, such as a fire station, from zoning regulations when the findings can be made consistent with Administrative Regulation (AR) 1.60.

The project site is within the Airport Influence Area of the San Diego International Airport, Airport Land Use Compatibility Overlay Zone.

5.1.2 REGULATORY FRAMEWORK

State

California Green Building Standards Code

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. CALGreen standards requires new residential and non-residential buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. CALGreen also provides voluntary measures (CALGreen Tier 1 and Tier 2) that local governments may adopt which encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code was adopted in 2022 and went into effect January 1, 2023. The project would be constructed in compliance with CALGreen.

Local

San Diego Forward: The Regional Plan

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.

On December 10, 2021, the SANDAG Board of Directors adopted San Diego Forward: The Regional Plan (Regional Plan). The Regional Plan combines the prior 2050 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) adopted in 2011 and the Regional Comprehensive Plan adopted in 2004. The Regional Plan updates growth forecasts and is based on the most recent planning assumptions from 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 be updated every 4 years in response to the ongoing land use planning within the City and other jurisdictions as well as to address legal updates. SANDAG is currently preparing the 2025 Regional Plan, which provides a vision for the region through 2050. Adoption of the 2025 Regional Plan is anticipated in late 2025.

City of San Diego General Plan

In 2024, the City's General Plan was updated to address the adopted CAP and the SANDAG 2021 RTP/SCS. The City's General Plan is comprised of the following elements that provide a comprehensive slate of citywide policies and further the "City of Villages" smart growth strategy for growth and development (City of San Diego 2024a). An analysis of consistency with applicable General Plan goals or policies adopted for the purpose of avoiding or mitigating an environmental effect are provided in Table 5.1-1.

Land Use and Community Planning Element. 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 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. As previously mentioned, the project site is designated Industrial Employment in the General Plan Land Use and Community Planning Element, which allows for development of a fire station.

Mobility Element. 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. The project would be consistent with the city's policies related to walkability as the project proposes pedestrian improvements by adding a new crosswalk across 47th Street that would connect to an existing sidewalk along the east side of 47th Street.

Urban Design Element. "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. Urban Design Element goals and policies associated with providing a cohesive design that is compatible in use, scale, and character with the surrounding environment would be applicable to the project. Further, the project would implement Urban Design Element goals and

policies as the proposed grading of the project site is designed to retain the majority of the site as open space, reduce the overall grading footprint, and integrate the proposed building into the site topography.

Economic Prosperity Element. 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. The project includes community investment and supports local employment. Protecting life and property from fire risk and other medical emergencies ensures continued economic growth.

Public Facilities, Services, and Safety Element. 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. The project would implement Public Facilities, Services, and Safety Element goals and policies by constructing a new fire station to meet the San Diego Fire Department's response time to serve the eastern portion of the service area that is currently underserved.

Recreation Element. 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 project does not include new housing or a new population; therefore, policies specific to providing parks and recreation would not be applicable to the project.

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. The project proposes new development on vacant land that addresses the Conservation Element goals and policies by including sustainable design features, consistency with the City's CAP, and conservation of biological resources.

Housing Element. 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 adaption strategies, and encourage sustainable patterns of movement. The project does not include new housing or a new population; therefore, policies specific to housing would not be applicable to the project.

Noise Element. 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. It also establishes noise land use compatibility guidelines. The City exempts noise generated by emergency sirens, which would include fire engines and other emergency vehicles. A detailed analysis of the project's compatibility with the General Plan noise policies is provided in Section 5.10, Noise.

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. The project site does not contain any buildings; therefore, the project would not be inconsistent with the City's goals to preserve and protect the history, culture, and quality of the built environment.

Environmental Justice Element. The purpose of this element is to identify and reduce unique and compounded health risks, increase community assets, and improve overall health in the city. This element defines Environmental Justice Communities (EJ Communities) as areas of the city most impacted and negatively affected by environmental burdens and associated health risks. As shown in Figure EJ-1 of the City's General Plan Environmental Justice Element, the project site is located within an identified EJ Communities area. Further, as listed in Table EJ-1: Percentage of each Community Plan Area included in EJ Communities of the City's General Plan Environmental Justice Element, 93% of the MCCP area is identified as EJ Communities. Because the project proposes to develop a new fire station in an EJ Communities area, goals and policies within the Environmental Justice Element associated with promoting public facilities in areas with the greatest needs would therefore be relevant to the project.

Mid-City Communities Plan

The project site is located within the MCCP which is centrally located in the San Diego metropolitan area, northeast of Centre City, south of Mission Valley, and west of the City of La Mesa. Mid-City consists of a cluster of four smaller communities: Normal Heights, Kensington-Talmadge, City Heights, and Eastern, each with its own distinctive character, and its own community planning group. As previously discussed in Section 5.1.1, the project site is located in the City Heights area within the Ridgeview neighborhood. This area features a "grid" pattern and strip commercial

development with gently rolling mesas divided by canyons on both the north and south edges of the community. Hills and canyons in the eastern portion of the community feed into the Chollas Parkway Open Space, which bisects the area from northeast to southwest. The City is currently in the process of updating the M CCP anticipated to be adopted in late 2026.

The M CCP sets forth goals, policies, and proposals to guide future development within the City Heights community. The M CCP identifies issues and goals of the community with respect to land use, public facilities, urban design, and environmental constraints.

The M CCP includes four elements: Neighborhoods Element, Natural and Cultural Resources Element, Public Facilities and Services Element, and Transportation Element.

The M CCP provides land use designation maps of the four communities within the community plan, including the City Heights area. As shown in the M CCP, the City Heights area generally includes land designated for residential, commercial, industrial, and open space. The project site is designated as Industrial in the M CCP. The following are the overall goals of the M CCP that would be applicable to the project (City of San Diego 2015):

- Minimize development in areas prone to liquefaction. Ensure adequate building measures when development of liquefaction areas is unavoidable.
- Avoid building construction in areas with inadequate soil conditions.
- Protect canyon, hillside, and creek-side natural wildlife habitats from urban encroachment and conflicting uses.
- Improve and enhance riparian habitat in Chollas Creek.
- Maintain adequate sound levels in residential neighborhoods.
- Preserve sensitive hillside areas.
- Preserve areas of native vegetation.
- Protect biological, visual, and topographic resources.
- Preserve areas of Mid-City possessing significant archaeologic and paleontological interest.
- To achieve and maintain a high level of fire and life safety services throughout the community.
- To eliminate fire dangers, particularly in canyon areas.
- To provide adequate and reliable utility service while ensuring that public utilities facilities are not disruptive to the community.

- To provide parking that is adequate for its intended use, but that does not produce negative impacts on community character by providing an oversupply of parking.
- To provide adequate sidewalks and paths.

City of San Diego Municipal Code

Land Development Code Regulations

Base Zones

Chapter 13, Zones, of the San Diego Municipal Code (SDMC), establishes base zones and overlay zones for the land within the city. The establishment of base zones helps ensure that land uses 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. The majority of the project site is zoned RS-1-7 (Residential-Single Unit) with a small area zoned OP-2-1 (Open Space) (City of San Diego 2024b). The RS-1-7 zone allows for residential development of up to one dwelling unit for each 5,000 SF of lot area. The OP-2-1 zone is open space – park zone. This zone is applied to public parks and facilities in order to promote recreation and facilitate the implementation of land use plans. However, the City has a process to exempt all public facilities, such as a fire station, from zoning regulations when the findings consistent with AR 1.60.

Overlay Zones

The establishment of overlay zones is supplemental to the regulations established for base zones. Overlay zones are tailored to specific geographic areas of the city and address specific issues not addressed in base zones (City of San Diego 2025). This project site is within the Airport Compatibility Overlay Zone (ALUOZ) (San Diego International Airport – Review Area 2). Properties located within Review Area 2 are required to comply with the airspace protection compatibility requirements in accordance with SDMC Section 132.1520 (Airspace Protection Compatibility).

Environmentally Sensitive Lands

The project site contains Environmentally Sensitive Land 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 Environmentally Sensitive Lands Regulations contained in SDMC Section 143.0115 (Procedures and Regulations for Project- Specific Land Use Plans). The City's Environmentally Sensitive Lands Regulations are intended to protect environmentally sensitive lands

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 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. The entire project site is within the City of San Diego Subarea Plan. This subarea is generally characterized by urban land use. Within the City's MSCP Subarea, a largely contiguous, habitat baseline area or MHPA of approximately 60,000 acres was identified. 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 project area is located outside of these habitat linkages and core areas. A small portion of the project's proposed Brush Management Area overlaps the MHPA.

City of San Diego Climate Action Plan

The City's 2022 CAP outlines the actions that the City will undertake to achieve its proportional share of state greenhouse gas (GHG) emission reductions. The 2022 CAP establishes a community-wide goal of net zero by 2035, committing San Diego to an accelerated trajectory for GHG reductions. Consistency with reduction policies and measures included in the CAP to help meet the City's 2035 goal is addressed in Section 5.7, Greenhouse Gas Emissions. Successful implementation of the CAP will prepare for anticipated climate change impacts in the coming decades, help California achieve its reduction target by contributing the City's fair share of GHG reductions, and have a positive impact on the regional economy. 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 five strategies developed to reduce Citywide GHG emissions and to achieve the community-wide goal of net zero by 2035 (City of San Diego 2022a):

- Decarbonization of the Built Environment
- Access to Clean and Renewable Energy
- Mobility & Land Use
- Circular Economy & Clean Communities
- Resilient Infrastructure and Healthy Ecosystems

San Diego International Airport Land Use Compatibility Plan

The Airport Authority, which serves as the state-designated Airport Land Use Commission for San Diego County, adopts ALUCPs. ALUCPs serve as a tool for the Airport Land Use Commission when conducting reviews of proposed land uses in areas surrounding airports. The plans also assist the City, as an affected local land use jurisdiction, in the preparation or amendment of land use plans and ordinances, including its General Plan. Adopted in April 2014, and amended in May 2014, the San Diego International Airport ALUCP provides guidance for future development and redevelopment in the area surrounding the airport.

5.1.3 IMPACTS ANALYSIS

5.1.3.1 Issue 1: Community Plan Consistency

Issue 1: Would the proposal 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 the environmental goals and/or objectives of a community or general plan;
- Inconsistent or conflict with an adopted land use designation or intensity and result in indirect or secondary environmental impacts; or
- Substantially incompatible with an adopted plan;
- Develop or convert general plan land or community plan designated open space or prime farmland to more intensive land use.

Impact

The project site is designated Industrial Employment in the City's General Plan (see Figure 2-3, General Plan Land Use Designation in Chapter 2) and also designated Industrial in the M CCP (see Figure 2-4, Community Plan Land Use in Chapter 2).

The majority of the project site is zoned RS-1-7 (Residential-Single Unit) with a small area zoned OP-2-1 (Open Space) in the City's Zoning Code (see Figure 2-5, Zoning in Chapter 2). The RS-1-7 zone

allows for residential development of up to one dwelling unit for each 5,000 SF of lot area. The OP-2-1 zone is open space – park zone. This zone is applied to public parks and facilities in order to promote recreation and facilitate the implementation of land use plans. Further, implementation of the project would deviate from the RS-1-7 zoning related to building height and retaining wall height. However, as discussed above, public facilities may be exempt from zoning regulations when findings can be made consistent with AR 1.60. The proposed project would be compatible with surrounding uses including industrial, residential, and open space. Further, the project would be consistent with goals and policies adopted by the City, which are described in further detail below, that aim to maintain and enhance fire protection services in the surrounding area. Consequently, the project would not result in substantial incompatibility with an adopted plan.

Impacts associated with the potential for the project to conflict with environmental goals and policies of the General Plan and MCCP and general incompatibility or be incompatible with the allowable development intensity are analyzed and addressed in Chapter 5 of this EIR. The analysis in this section 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. Consistency with applicable environmental goals and policies of the City's General Plan and MCCP is provided in Tables 5.1-1 and 5.1-2. The project's consistency with the City's CAP and the City's noise policies is provided in Section 5.7, Greenhouse Gas Emissions and Section 5.10, Noise.

General Plan

The project would be consistent with the General Plan's Land Use and Community Planning Element, as the project would develop a public service facility, specifically a fire station, which is a use permitted in the Industrial Employment land use designation. Table 5.1-1 provides a detailed analysis of the project's consistency with the City's applicable General Plan environmental goals and policies. A general overview of the project's consistency with the various elements of the General Plan is provided in the following paragraphs.

The project would be consistent with the General Plan's Mobility Element goals and policies, as the project proposes to design and implement a safe and interconnected pedestrian route for the project site and surrounding area, per General Plan Policy ME-A.1. Frontage improvements including a sidewalk would be constructed along the project's 47th Street boundary and a crosswalk to connect the site to the existing sidewalk across the street. The project does not propose any change or modification to existing bike facilities and transit service in the area. Overall, the proposed development of the site would be consistent with the General Plan's Mobility Element's goals and policies.

The project would be consistent with the General Plan's Urban Design Element goals and policies. As described in Section 5.16, Visual Effects, the project would be constructed with the use of a variety of colors and textured materials that are compatible with surrounding development to articulate the building's facades and architectural features, per General Plan Urban Design Element Policy UD-A.3. The color scheme would use natural earth tone colors that complement the existing environment and surrounding development (see Figure 3-2, Project Rendering in Chapter 3). The project also plans on maintaining the open space characteristics of the area by reducing the overall grading footprint to a small portion (0.59-acre) of the 1.28-acre project site; retaining the majority of the site as open space and integrating the proposed building into the existing hillside, per General Plan Policy UD-A.1. As described in Chapter 3, Section 3.2.6, Sustainability Features, the project's proposed sustainability design features that align with the City's urban design policies, include but are not limited to, electric vehicle charging stations, solar ready design features for future installation of solar photovoltaic system, and drought adapted native vegetation per General Plan Urban Design Element Policy UD-A.4. Overall, the project 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 the project would not introduce a new population but proposes a planned facility to ensure adequate fire and emergency response time is provided to serve existing and planned development, per General Plan Policy PF-D.1 and Policy PF-D.4. As discussed in Section 5.13, Public Services, implementation of the project would not generate additional demand for public services and facilities within the specified service area beyond what is currently anticipated. Therefore, there would be no need to expand or build new police or fire facilities as a result of the project. With regard to parks and recreation facilities, the project would not introduce a new population that would result in an increased demand for recreational areas or uses in the community; therefore, the project would be consistent with the Recreation Element goals and policies.

Additionally, this EIR has analyzed potential safety hazards associated with the project and determined compliance with the California Building Code, the SDMC and other legal requirements would reduce safety impacts to a level below significance (see Sections 5.6, Geologic Conditions; 5.8, Health and Safety) per General Plan Policy PF-D.13. Potential impacts associated with adequate utility and water infrastructure has also been evaluated and determined impacts would be less than significant (see Sections 5.9, Hydrology; 5.14, Public Utilities; 5.17, Water Quality) per General Plan Policy PF-G.1.

The project would be consistent with the General Plan's Conservation Element, as the project would include sustainability features and would not conflict with the applicable strategies of the City's CAP (see Section 5.7, Greenhouse Gas Emissions) per General Plan Policy CE-A.5. The project would be

required to comply with the California Green Building standards (CALGreen). The project proposes to 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 per General Plan Conservation Element Policy CE-I.4. Additionally, as described in Section 5.4, Biological Resources, avoidance and resource protection measures (AM-BIO-1a through 1c) as well as the MSCP Land Use Adjacency Guidelines (LUAG) (Compliance Measures for coastal California gnatcatcher), would be implemented to help preserve biological resources consistent with General Plan Policy CE-G.1.

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. The project proposes a new fire station to ensure adequate response time is provided to serve existing and planned development, including future development proposed by implementation of the City's General Plan housing element. The project would not result in an inconsistency with the General Plan's Housing Element.

The project would be consistent with the General Plan's Noise Element. As concluded in the Noise Technical Report (Appendix G) and EIR Section 5.10, the project would not result in any substantial noise impacts as the project comply with applicable existing local and state noise regulations which are found in the SDMC Chapter 5, Article 9.5, Caltrans Transport Construction Vibration Guidance Manual, and Title 24 of the California Code of Regulations, per Policy NE-A.1.

The project would be consistent with the General Plan's Historic Preservation Element. This EIR has analyzed potential cultural and historic impacts through its Cultural Resources Technical Report (Appendix I) and Section 5.12, Historic Resources, and impacts would be less-than-significant with mitigation (**MM-HIST-1**) incorporated, which requires an Archaeological and Native American monitoring program, consistent with Policy HP-A.4.

The project would implement goals and policies within the Environmental Justice Element associated with promoting public facilities in areas with the greatest needs, per Policy EJ-G.1 as the project proposes a new fire station in an identified EJ Communities area. As such, the project would be consistent with the General Plan's Environmental Justice Element.

As previously discussed, the entirety of the project site is designated by the General Plan as Industrial Employment. Therefore, the proposed project would not result in the development or conversion of community plan designated open space or prime farmland to a more intensive land use.

Mid-City Communities Plan

Table 5.1-2 provides a detailed analysis of the project's consistency with the MCCP's environmental goals applicable to the project. An overview of the project's consistency with the MCCP is provided in the following paragraphs.

The MCCP states the following with respect to fire stations: "There are four additional stations near Mid-City to the west and south. Response time for all four Mid-City stations is less than eight minutes for 85 percent of fire engine responses and twelve minutes for 94 percent of paramedic ambulances. The City's performance measures are for the Fire Department to arrive at non-medical incidents within an average time of six minutes and for medical emergencies within eight minutes 90 percent of the time. Neither of these performance measures is being met at this time." (City of San Diego 2015, p. 130.) The MCCP's vision is for the provision of a "high level of fire protection and life safety services," and a goal to "achieve and maintain a high level of fire and life safety services throughout the community." To that end, the MCCP recommends to "[u]pgrade facilities for fire and life safety as needed." The project would meet the objective of this statement by constructing a new fire station in the City Heights community. In addition, as previously mentioned, frontage improvements including a sidewalk would be constructed along the project's boundary with 47th Street and a crosswalk to connect the site to the existing sidewalk across the street; thereby, meeting the MCCP's goal of providing adequate sidewalks. Further, consistent with design policies and guidelines of the MCCP, the project is proposing a landscape plan that would provide character and visual interest through the incorporation of drought-tolerant native vegetation, such as shrubs of varying heights, a wide selection of cactus and succulents, as well as shade trees. Finally, the project takes into consideration goals related to the preservation of open space, sensitive hillsides, and protection of natural hillsides because the proposed grading plan is designed to retain the majority of the site as open space, reduce the overall disturbance footprint, and integrate the proposed building into the existing site topography.

As previously discussed, the entirety of the project site is designated as industrial land use in the MCCP. Therefore, the proposed project would not result in the development or conversion of community plan designated open space or prime farmland to a more intensive land use.

Climate Action Plan

As detailed further in Section 5.7, Greenhouse Gas Emissions, the project would be consistent with the City's CAP. The CAP relies on SANDAGs growth assumptions to determine the GHG emissions attributed to build out of the city. As described in Section 5.3, Air Quality, the project is consistent with SANDAG Series 14 growth projections, which were used to determine the CAP projections.

Significance of Impact

In conclusion, the project is generally consistent and compatible with the environmental goals and policies of the City's General Plan and MCCP, as discussed above and in Tables 5.1-2 and 5.1-3. Additionally, as discussed in Section 5.7, Greenhouse Gas Emissions the project would not conflict with the environmental principles, goals, and policies contained within the City's CAP. Therefore, impacts would be considered **less than significant**.

Mitigation

No mitigation would be required.

5.1.3.2 Issue 2: Deviation or Variance

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

Threshold

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.

Per the City's thresholds, for example, a rock crusher in a residential area would result in land use conflicts related to environmental consequences (i.e. noise), and environmental impacts would result. As a general rule, projects that are consistent with the zoning and compatible with surrounding uses should not result in land use impacts.

Impact

The project site is designated Industrial Employment in the City's General Plan and zoned Residential-Single Unit (RS-1-7) and Open Space-Park (OP-2-1). The project proposes construction of a four-story fire station on a 1.28-acre lot. As discussed in Section 2. Environmental Setting, surrounding land uses include industrial and residential. Section 4 details the site selection process utilized by the SDFD Logistics Division and EDD and the various factors considered when evaluating potential properties for a fire station within the given service gap area. Additionally, the project site is designated Industrial Employment in the City's General Plan (2024) and Industrial in the MCCP (2015) which allows development of a fire station. No deviation or variance would be required under the SDMC, as the City has a process to exempt public facilities from zoning regulations when findings can

be made consistent with AR 1.60. The project would be compatible with air space regulations (see Issue 5 below). As discussed in Section 5.4, Biological Resources and 5.7, Greenhouse Gas Emissions, the project would be compatible with adjacent MHPA and open space. The project would incorporate sustainable design features and would be consistent with the City of San Diego CAP. The project is also considered a Small Project under the City of San Diego Transportation Study Manual, would not result in significant VMT impacts. Other sections included in Chapter 5 of this EIR further evaluate any direct, indirect, or secondary impacts of the project as it relates to air emissions, noise, vehicle trips, etc.

Significance of Impact

The proposed project would not result in indirect or secondary environmental impacts due to a conflict with the underlying land use designation or intensity or incompatibility with surrounding uses. Impacts would be **less than significant**.

Mitigation

No mitigation would be required.

5.1.3.3 Issue 3: Conflicts with City's MSCP Subarea Plan

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

Threshold

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

The project site lies within the "Urban Area" of the City's MSCP Subarea Plan. The MSCP Subarea Plan provides guidelines for compatible uses within the MHPA, general planning policies, design guidelines, and general management directives regarding issues such as mitigation, restoration, public access, trails and recreation, litter/trash storage, adjacency management issues, exotics control, and flood control. The project site and construction staging area are located directly adjacent to the City's MHPA. A small portion of the proposed Zone 2 Brush Management Area overlaps the MHPA. As detailed in Section 5.4, Biological Resources, the project is a compatible land use adjacent to the MHPA and follows the siting criteria outlined in Section 1.4.2 of the MSCP. Since

there are no direct impacts to MHPA lands proposed as part of the project, in conjunction with the measures described in Section 5.4, Biological Resources, construction of the fire station would not impact the goals and objectives of the City's Subarea Plan. Therefore, the project is consistent with the guidelines and policies of the MSCP.

Significance of Impact

The proposed project 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. Therefore, impacts would be **less than significant**.

Mitigation

No mitigation would be required.

5.1.3.4 Issue 4: Physically Divide an Established Community

Issue 4: *Would the proposal physically divide an established community?*

Threshold

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

- Physically divide an established community.

Impact

The project site consists of undeveloped land located on a hillside between an existing residential community to the east and a canyon to the north and northwest. The canyon is bisected by Chollas Creek and Fairmont Avenue which create a physical boundary to the northwest and west. The project site is undeveloped; therefore, the project would not physically divide an established community

Significance of Impact

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

Mitigation

No mitigation would be required.

5.1.3.5 Issue 5: Airport Land Use Compatibility Plans

Issue 5: *Would the proposal 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

The project site is located in Review Area 2 of the Airport Influence Area, according to the San Diego International Airport ALUCP. Review Area 2 consists of locations beyond Review Area 1 but within the airspace protection and/or overflight notification area. Limits on the heights of structures, particularly in area of high terrain, are the only restrictions on land use within Review Area 2. Within Review Area 2 building heights are limited to 200 feet above ground level. The proposed fire station would be a maximum of 64 feet above grade, which would be within the allowable height limits provided in the ALUCP (San Diego County Regional Airport Authority 2025). Moreover, the project does not propose uses that would create electrical hazards to aircraft, and it does not 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 also would not include large water features or other uses that would attract wildlife such as birds that could interfere with aircraft operations. Overall, the project would not result in land uses that are incompatible with the San Diego International Airport ALUCP.

Significance of Impact

The project would not result in land uses that are incompatible with the San Diego International Airport ALUCP, and impacts would be **less than significant**.

Mitigation

No mitigation would be required.

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**Table 5.1-1
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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
<i>Land Use and Community Planning Element</i>			
<i>Policy LU-D.13</i>	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.	<p>The project was analyzed for consistency with the City's General Plan and the MCCP in Section 5.1, Land Use. The project would provide additional benefit to the community and would implement General Plan and MCCP goals by constructing a new fire station to meet the San Diego Fire Department's response time to serve the eastern portion of the service area that is currently underserved.</p> <p>The project would have less-than-significant impacts to public facilities, as detailed in Section 5.13, Public Services and Facilities.</p> <p>Additionally, the project would have less-than-significant impacts regarding visual effects and neighborhood character, as detailed in Section 5.16, Visual Effects and Neighborhood Character.</p>	The project would be consistent with this policy.
<i>Policy LU-H.6</i>	Provide linkages among employment sites, housing, and villages via an integrated transit system and a well-defined pedestrian and bicycle network.	As discussed in Section 5.2, Transportation, a pedestrian and bicycle path network would be connected to the project. The existing pedestrian bicycle, and transit facilities available along 47th Street and Fairmount Avenue would serve the project. Additionally, the project would construct frontage improvements including a sidewalk along 47th Street adjacent to the project site and a crosswalk to connect the site to the existing	The project would be consistent with this policy.

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		sidewalk across the street. Near the project site there is a Class II bike lane along Fairmount Avenue which connects to a bike lane along Home Avenue, north of the project. The nearest bus stop is located approximately 0.15 miles west of the project site, at the intersection of Fairmount Avenue and 47th Street and is served by MTS Route 13. As noted in Section 5.2.1 Existing Conditions, Route 13 provides service between the 24th Street Transit Center in National City to Kaiser Hospital in Allied Gardens and operates at a frequency of 20 minutes during the week and 30 minutes on the weekends. As such, the project would be consistent with this policy.	
<i>Mobility Element</i>			
<i>Policy ME-A.1</i>	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.	<p>The project would directly improve the walkability of the project site and surroundings as pedestrian access would be provided via a new crosswalk across 47th Street that would connect to an existing sidewalk along the east side of 47th Street.</p> <p>Access to the project site would be provided via one standard driveway off 47th Street to accommodate passenger vehicles, and one larger driveway connected to the apparatus bay, also off 47th Street, to accommodate fire vehicles and</p>	The project would be consistent with this policy.

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		<p>equipment. Both vehicle access points are located on the east side of the project site. Two parking spaces would provide access to electrical vehicle charging hookups.</p> <p>The existing pedestrian bicycle, and transit facilities available along 47th Street and Fairmount Avenue would serve the project. Near the project site there is a Class II bike lane along Fairmount Avenue which connects to a bike lane along Home Avenue, north of the project. The nearest bus stop is located approximately 0.15 miles west of the project site, at the intersection of Fairmount Avenue and 47th Street and is served by MTS Route 13. As noted in Section 5.2.1 Existing Conditions, Route 13 provides service between the 24th Street Transit Center in National City to Kaiser Hospital in Allied Gardens and operates at a frequency of 20 minutes during the week and 30 minutes on the weekends.</p> <p>While the SDMC does not require bicycle parking, the project would provide two short term and two long term bike parking spaces via a bike rack located near the fire station's visitor entrance.</p> <p>The proposed landscaping plan has been designed in accordance with SDMC Section 142.0402, Land Development Manual, Landscape Standards, and</p>	

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		<p>other applicable city and regional standards for landscape installation and maintenance. A detailed landscape plan and plant palette would be submitted to the San Diego Fire Department for review and approval prior to the issuance of building permits.</p> <p>Project signage would be installed at the project entrance, identifying it as the “Fairmount Avenue Fire Station” (see Figure 3-2, Project Rendering).</p> <p>Onsite lighting would include building lights that would meet the state’s building code and the City’s lighting standards and would be shielded and downward focused to avoid light spillover.</p>	
<i>Policy ME-A.2</i>	<p>Design and implement safe pedestrian routes.</p> <p>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,</p>	Refer to the analysis for <i>Policy ME-A.1</i>	The project would be consistent with this policy.

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<p>pedestrian trails, and educating children on traffic and bicycle safety.</p> <p>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.</p> <p>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.</p> <p>d. Implement Crime Prevention Through Environmental Design (CPTED) measures to reduce the threat and incidence of crime in the pedestrian environment (see also Urban Design Element, Policy UD-A.17).</p> <p>e. Ensure that there are adequate law enforcement, code enforcement, and litter and graffiti control to maintain safe and attractive neighborhoods.</p> <p>f. Provide adequate levels of lighting for pedestrian safety and comfort.</p>		
<i>Policy ME-A.4</i>	Make sidewalks and street crossings accessible to pedestrians of all abilities.	Refer to the analysis for <i>Policy ME-A.1</i> All proposed sidewalks and street crossings would be	The project would be

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<ul style="list-style-type: none"> 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. 	constructed in accordance with all federal, state, and local safety requirements.	consistent with this policy.
<i>Policy ME-A.5</i>	<p>Provide adequate sidewalk widths and clear path of travel as determined by street classification, adjoining land uses, and expected pedestrian usage.</p> <ul style="list-style-type: none"> 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 <i>Policy ME-A.1</i>	The project would be consistent with this policy.
<i>Policy ME-A.6</i>	<p>Work toward achieving a complete, functional and interconnected pedestrian network.</p> <ul style="list-style-type: none"> 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 	Refer to the analysis for <i>Policy ME-A.1</i>	The project would be consistent with this policy.

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<p>provided in the Pedestrian Improvements Toolbox, Table ME-1.</p> <ol style="list-style-type: none"> 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. 		

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	e. Routinely accommodate pedestrian facilities and amenities into private and public plans and projects.		
<i>Policy ME-A.7</i>	<p>Improve walkability through the pedestrian-oriented design of public and private projects in areas where higher levels of pedestrian activity are present or desired.</p> <ul style="list-style-type: none"> 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. 	Refer to the analysis for <i>Policy ME-A.1</i>	The project would be consistent with this policy.

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<p>d. Enhance alleys as secure pathways to provide additional pedestrian connections.</p> <p>e. Implement traffic-calming measures to improve walkability in accordance with Policy ME-C.5.</p> <p>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 that contribute to the historic character of a neighborhood.</p>		
<i>Policy ME-E.3</i>	Emphasize the movement of people rather than vehicles.	<p>As discussed in Section 3.2.2, Parking and Access Improvements, a pedestrian and bicycle path network would be connected to the project. Additionally, the project would construct frontage improvements including a sidewalk along 47th Street adjacent to the project site and a crosswalk to connect the site to the existing sidewalk across the street consistent with the MCCP goal of providing adequate sidewalks</p> <p>The project would provide pedestrian paths for future employees/visitors of the project, therefore emphasizing and taking into consideration the movement of people. The project would be consistent with this policy.</p>	The project would be consistent with this policy.

Table 5.1-1
City of San Diego General Plan Consistency Review

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
<i>Policy ME-E.6.</i>	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 conducive 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 <i>Policy ME-A.1.</i>	The project would be consistent with this policy.
<i>Policy ME-F.4</i>	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 <i>Policy ME-A.1</i>	The project would be consistent with this policy.
<i>Policy ME-G.1</i>	Provide and manage parking so that it is reasonably available when and where it is needed.	Refer to the analysis for <i>Policy ME-A.1</i>	The project would be consistent with this policy.

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
<i>Policy ME-G.2.b</i>	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.	Refer to the analysis for <i>Policy ME-A.1</i>	The project would be consistent with this policy.
<i>Urban Design Element</i>			
<i>Policy UD-A.1</i>	<p>Preserve and protect natural landforms and features.</p> <ul style="list-style-type: none"> a. Protect the integrity of community plan designated open spaces b. Continue to implement the Multiple Species Conservation Program (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. 	As discussed in Section 5.16, Visual Effect/Neighborhood Character, the project site contains steep hillsides. While hillsides are not expressly identified as significant public resources, the Urban Design Element of the MCCP requires the preservation of sensitive hillsides and protection of natural hillsides (City of San Diego 2015). The proposed grading of the project site is designed to retain the majority of the site as open space, reduce the overall grading footprint, and integrate the proposed buildings into the hillside. Additionally, the project would not result in any significant impacts regarding visual effects and neighborhood character (see Section 5.16, Visual Effect/Neighborhood Character). Ultimately, the project would preserve approximately 0.9 acres of the 1.28-acre site as open space (Appendix F.2). Significant impacts to sensitive upland biological	The project would be consistent with this goal.

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		<p>resources would be fully mitigated through the purchase of off-site mitigation credits.</p> <p>While the project would develop within a hillside area, the proposed development would be designed to integrate into the hillside with terracing and use of walls that minimize the grading footprint as well as the preservation of approximately 70% of the project site as on-site open space (Appendix F.2) As such, the project takes into consideration this MSCP policies related to protecting the integrity of designated open space.</p> <p>As previously discussed in Section 5.1.3.3, the nearest MHPA occurs approximately 20 feet from the proposed project site. As detailed in Section 5.4, Biological Resources, the project is a compatible land use adjacent to the MHPA and follows the siting criteria outlined in Section 1.4.2 of the MSCP. Thus, the project would be implemented in accordance with the MSCP.</p>	
<i>Policy UD-A.3</i>	<p>Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.</p> <p>a. Integrate development on hillside parcels with the natural environment to preserve</p>	<p>The City's design guidelines include guidance on building form, mass, and scale; materials and colors; and site design. This includes guidance on providing architectural elements with visual interest such as varied rooflines and facades. The intent of the guidelines is to have the project design be</p>	<p>The project would be consistent with this goal.</p>

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<p>and enhance views, and protect areas of unique topography.</p> <p>b. Minimize grading to maintain the natural topography, while contouring any landform alterations to blend into the natural terrain.</p> <p>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.</p> <p>d. Consider terraced homes, stepped down with the slope for better integration with the topography to minimize grading in sensitive slope areas.</p> <p>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.</p> <p>f. Provide increased setbacks from canyon rims or open space areas to ensure that the visibility of new development is minimized.</p> <p>g. Screen development adjacent to natural features as appropriate so that development</p>	<p>harmonious with the surrounding community. The project plans maintain the natural topography of the area by minimizing grading for the project.</p> <p>Additionally, as discussed in Section 5.16, Visual Effect/Neighborhood Character, the project would not result in visual effect of neighborhood character impacts. Through compliance with the City's design guidelines and development regulations for the RS-1-7 zone (except for height), the project would not be characterized as a negative aesthetic impact. Development of the project site would occur in an organized manner that would be guided by a site plan and the project would result in a compatible theme and element with the surrounding neighborhood. With the inclusion of landscaping on new graded slopes, the project would not create a negative visual appearance. The retaining wall would be screened from off-site viewers due to the location of the wall behind the proposed fire station and existing vegetation, its adjacency to existing slopes, and proposed landscape design features.</p> <p>To minimize site grading and to incorporate the existing site topography, a portion of the proposed building would be constructed using the existing hillside. The project would also include a Landscape</p>	

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<p>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.</p> <p>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.</p> <p>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 canyon trails at the point the trail is located nearest to proposed development. Lines-of-sight from trails or the open space system</p>	<p>Plan to enhance the character of the building with drought adapted native vegetation that requires minimal maintenance and irrigation needs and to screen the wall from public view. In addition, the architectural design of the proposed fire station would be visually compatible with modern development located in the surrounding area and would consist of colors to complement nearby development.</p> <p>The proposed fire station would be located in an area that contains undeveloped hillsides that support coastal sage scrub vegetation and is visible from Fairmount Avenue and 47th Street. However, while views of the site are available to motorists and pedestrians, views from these roadways would be experienced over a very brief duration. The open space area west and northwest of the project site along 47th Street features rugged, coastal sage scrub vegetation with some taller trees, that provide a partial screening of the project site. The site is also visible from open space areas and walking trails within the adjacent Chollas Creek Watershed, although views of the proposed fire station would be shielded by the proposed</p>	

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<p>could be used to determine compliance with this policy.</p> <p>j. Design and site buildings to permit visual and physical access to the natural features from the public right-of-way.</p> <p>k. Encourage location of entrances and windows in development adjacent to open space to overlook the natural features.</p> <p>l. Protect views from public roadways and parklands to natural canyons, resource areas, and scenic vistas.</p> <p>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.</p> <p>n. Provide public pedestrian, bicycle, and equestrian access paths to scenic view points, parklands, and where consistent with resource protection, in natural resource open space areas.</p> <p>o. Provide special consideration to the sensitive environmental design of roadways that traverse natural open space systems to ensure an integrated aesthetic design that</p>	<p>retaining wall that would surround the proposed fire station.</p> <p>As the proposed project site is undeveloped and does not itself feature designated public trails or view corridors, implementation of the project would not impact a significant public view from a hillside area. Similarly, the hillside to the east of the site is developed with private residential properties and does not support public use, and private views from these residences to the project site are limited due to thick vegetation. Thus, the project would not impact a public view from this hillside area.</p> <p>Additionally, as discussed in Section 5.18, Wildfire, portions of the project site are located within a Local Responsibility Area and classified as non-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 Brush Management Zone requirements detailed in Section 5.18, Wildfire, and as determined by the San Diego Fire Rescue Department. The project would also use drought-tolerant, native landscaping, as discussed in the Design Guidelines. The project would be required to design, construct,</p>	

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<p>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> <p>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.</p>	<p>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. The project would include appropriate measures to reduce wildfire risks as conditions of approval, including pre-construction brush management is completed to reduce potential impacts related to construction and avoidance of highly flammable landscaping plant materials.</p>	
<i>Policy UD-A.4</i>	Use sustainable building methods in accordance with the sustainable development policies in the Conservation Element.	<p>The project would be required to comply with the California Green Building standards (CALGreen), which would substantially improve energy and water conservation, as well as operational efficiency. As part of the project design, the project would include the following sustainability elements:</p> <ul style="list-style-type: none"> • Two Electric Vehicle (EV) charging stations. • Solar Ready Design. The proposed building would be equipped with solar ready design features that would facilitate and optimize the installation of a rooftop solar photovoltaic (PV) system, following construction of the building. 	The project would be consistent with this policy.

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		PV installation would require separate approvals and permits not included in the project.	
<i>Policy UD-A.5</i>	<p>Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.</p> <ul style="list-style-type: none"> 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 	<p>Per the design guidelines, the architectural design theme for the project would integrate the unique character of the project site's topography combined with a modern California design. The project's buildings would be finished with brown, gray, and light-colored tones and textured materials that are compatible with surrounding development and the existing native vegetation. To minimize site grading and to incorporate the existing site topography, a portion of the building would be constructed using the existing hillside. The project would also include a Landscape Plan to enhance the character of the building with drought adapted native vegetation that requires minimal maintenance and irrigation needs and would help to screen and soften the retaining walls from public view. The project envisions a climate-appropriate plant palate that would aid in the screening of graded slopes and retaining walls as experienced from locations to the north and west. Architectural elevations are depicted on Figure 3-3a through 3-3d, Elevations. In addition, a three-dimensional, perspective rendering of a proposed building is included on Figure 3-2, Project Rendering. Lastly, other than</p>	<p>The project would be consistent with this policy.</p>

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<p>the pedestrian experience. For example, walls could protrude, recess, or change in color, height, or texture to provide visual interest.</p> <p>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.</p> <p>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.</p> <p>h. Acknowledge the positive aspects of nearby existing buildings by incorporating compatible features in new developments.</p> <p>i. Maximize natural ventilation, sunlight, and views.</p> <p>j. Provide convenient, safe, well-marked, and attractive pedestrian connections from the public street to building entrances.</p>	<p>exceeding the allowable building height, the project would otherwise comply with all City regulations and design guidelines. The project would not result in a disorganized appearance. The project would construct frontage improvements including a sidewalk along 47th Street adjacent to the project site and a crosswalk to connect the site to the existing sidewalk across the street.</p>	

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	k. Design roofs to be visually appealing when visible from public vantage points and public rights-of-way.		
<i>Policy UD-A.6</i>	<p>Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.</p> <ul style="list-style-type: none"> 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. 	<p>Refer to the analyses for <i>Policy UD-A.5</i>.</p> <p>Project signage would be installed at the project entrance, identifying it as the “Fairmount Avenue Fire Station” (see Figure 3-2, Project Rendering). The project would be designed to be 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 3.1, Project Objectives). Should the project be approved, no deviations would need to be approved.</p>	The project would be consistent with this policy.
<i>Policy UD-A.8</i>	Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.	As detailed in Section 3.2.3, Landscaping, Brush Management, and Revegetation, the project’s landscape plan would include drought-tolerant native vegetation. The landscape scheme would include shrubs of varying heights, a wide selection	The project would be consistent with this policy.

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<ul style="list-style-type: none"> 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 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. 	<p>of cactus and succulents, as well as three (3) shade trees. Native vegetation including California Sagebrush and California Encelia would be used to revegetate graded areas. The proposed landscaping would be designed in accordance with the City's Municipal Code Section 142.0402, the Land Development Manual, Landscape Standards, and other applicable city and regional standards for landscape installation and maintenance as identified in the City's Design Guidelines. A detailed landscape plan and plant palette would be submitted to the City of San Diego Environmental Designee for review and approval prior to the issuance of building permits. 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.</p> <p>A Stormwater Quality Management Plan has also been developed for the project and includes best management practices (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</p>	

**Table 5.1-1
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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<ul style="list-style-type: none"> 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 	<p>(Appendix F.2), implementation of the project would not adversely affect existing drainage patterns.</p> <p>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 stormwater program and related National Pollutant Discharge Elimination System (NPDES) standards. Additionally, the project would implement an approved Stormwater 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.</p>	
<i>Policy UD-A.13.</i>	<p>Provide lighting from a variety of sources at appropriate intensities and qualities for safety.</p> <ul style="list-style-type: none"> 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. 	<p>As discussed in Section 5.16, Visual Effects/Neighborhood Character, the project would introduce new sources of lighting on the project site. All lighting proposed would be constructed in compliance with the standards contained in the City's Outdoor Lighting Regulations (SDMC 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</p>	<p>The project would be consistent with this policy.</p>

**Table 5.1-1
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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<p>d. Use vandal-resistant light fixtures that complement the neighborhood and character.</p> <p>e. Focus lighting to eliminate spill-over so that lighting is directed and only the intended use is illuminated.</p>	<p>order to preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination. 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 and structures. In addition, lighting would be provided throughout the project, especially along the pedestrian walkways. To minimize glare and contrast, safety 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. It is also important to note that there are no sensitive receptors directly adjacent to the project site.</p> <p>Furthermore, Section 5.16 determined that the project would result in less-than-significant impacts from light and glare.</p>	
<i>Policy UD-A.14.</i>	<p>Provide comprehensive project sign plans to effectively utilize sign area.</p> <p>a. Design signs as a means to communicate a unified theme and identity for the project.</p>	<p>Project signage would be installed at the project entrance, identifying it as the “Fairmount Avenue Fire Station” (see Figure 3-2, Project Rendering). All signage would be consistent with Chapter 14 Article 2 Division 12 of the SDMC.</p>	<p>The project would be consistent with this policy.</p>

**Table 5.1-1
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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<ul style="list-style-type: none"> 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. d. Design signs to minimize negative visual impacts. 		
<i>Policy UD-A.16</i>	<p>Minimize the visual and functional impact of utility systems and equipment on streets, sidewalks, and the public realm.</p> <ul style="list-style-type: none"> a. Convert overhead utility wires and poles, and overhead structures such as those associated with supplying electric, communication, community antenna television, or similar service to underground. b. Design and locate public and private utility infrastructure, such as phone, cable and communications boxes, transformers, meters, fuel ports, back-flow preventors, ventilation grilles, grease interceptors, irrigation valves, and any similar elements, to be integrated into adjacent development and as inconspicuous as possible. To minimize 	<p>Details regarding utilities is found in Section 3.2.4, Utilities. No new overhead utility wires and poles or other overhead structures are proposed as part of the project.</p> <p>The project would tie into the City's existing 8-inch water main located in 47th Street with a measured pressure of 104 pounds per second (psi), as required by the City's Public Utilities Department. On-site domestic and irrigation water would be provided by a 2-inch water service line and meter, along with a 2.5-inch Reduced Pressure Backflow Device. Fire service would be equipped with a 6-inch water service line and a 6-inch Reduced Pressure Backflow Device and Lateral.</p>	The project would be consistent with this policy.

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<p>obstructions, elements in the sidewalk and public right of way should be located in below grade vaults or building recesses that do not encroach on the right of way (to the maximum extent permitted by codes). If located in a landscaped setback, they should be as far from the sidewalk as possible, clustered and integrated into the landscape design, and screened from public view with plant and/or fencelike elements.</p> <p>c. Traffic operational features such as streetlights, traffic signals, control boxes, street signs and similar facilities should be located and consolidated on poles, to minimize clutter, improve safety, and maximize public pedestrian access, especially at intersections and sidewalk ramps. Other street utilities such as storm drains and vaults should be carefully located to afford proper placement of the vertical elements.</p>	<p>An existing sanitary sewer line is located within 47th Street. The project would connect to the existing infrastructure via two new sewer lines, a 6-inch lateral and a clarifier for the fire station, and a separate sewer line for the trash enclosure drain. Wastewater collection and the City's sewage system are maintained and operated by the City's Public Utilities Department to ensure sufficient capacity is available for dry weather conditions and storm or wet weather peak-flow events.</p> <p>The project site includes an existing storm drain originating from 47th Street that daylights at the bottom of the site slope and drains offsite. The project would route all stormwater runoff into an on-site biofiltration system and then into an underground detention system. The underground detention system would discharge into an existing 18-inch storm drainpipe located adjacent to 47th Street near the northeast corner of the site. Stormwater flows would be maintained at pre-development rates.</p> <p>The following measures would help facilitate the operation of fire engine and other emergency vehicles at the Fairmount Avenue/47th Street intersection and project driveways and manage traffic during project construction:</p>	

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		<ul style="list-style-type: none"> • The traffic signal at the 47th Street and Fairmount Avenue intersection would be controlled by the engine operator to prioritize emergency vehicles coming from 47th Street. • All regulatory and warning signs installed would be consistent with current California Manual on Uniform Traffic Control Devices (MUTCD) standards and guidelines. • The project would provide proper pavement markings and associated stop bars at the project aprons/driveways. • Any proposed landscaping at the project driveways along 47th Street would be set back sufficiently so as not to create any sight distance constraints at the access driveways. • As shown on the site plan (see Figure 3-1 in Chapter 3, Project Description), the fire station building would be setback to provide adequate throat depth on-site for outbound emergency vehicles. • Construction equipment and materials would be staged on site and at an off-site location (see Figure 3-6, Off-site Construction Staging in Chapter 3, Project Description), approximately 0.40-mile southwest of the project site. 	

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
<i>Policy UD-A.17.</i>	<p>Incorporate crime prevention through environmental design measures, as necessary, to reduce incidences of fear and crime, and design safer environments.</p> <ul style="list-style-type: none"> a. Design projects to encourage visible space and “eyes on the street” security that will 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. 	<p>The project would incorporate safety lighting throughout the project site for security purposes. For security purposes, the two visitor stalls near the driveway off 47th Street would be separated from the employee parking stalls via a security gate. 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 and structures. In addition, lighting would be provided throughout the project, especially along the pedestrian walkways.</p>	<p>The project would be consistent with this policy.</p>
<i>Policy UD-B.1</i>	<p>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</p>	<p>Refer to analyses in <i>Policies UD-A.5 and UD-A.6</i> and <i>Policy ME-A.1</i></p>	<p>The project would be consistent with this policy.</p>

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<p>neighborhood or community plan area in which they are located for design continuity and compatibility.</p> <p>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.</p> <p>b. Design new construction to respect the pedestrian orientation of neighborhoods.</p> <p>c. Provide innovative designs for a variety of housing types to meet the needs of the population.</p>		
<i>Policy UD-B.4</i>	Create street frontages with architectural and landscape interest for both pedestrians and neighboring residents.	Refer to the analyses for <i>Policies UD-A.5</i> and <i>UD-A.6</i> .	The project would be consistent with this policy.

**Table 5.1-1
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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<ul style="list-style-type: none"> a. Locate buildings on the site so that they reinforce street frontages. b. Relate buildings to existing and planned adjacent uses. c. Provide ground level entries and ensure that building entries are prominent and visible. d. Maintain existing setback patterns, except where community plans call for redevelopment to change the existing pattern. e. Locate transparent features such as porches, stoops, balconies, and windows facing the street to promote a sense of community. f. Encourage side- and rear-loaded garages. Where not possible, reduce the prominence of the garage through architectural features and varying planes. g. Minimize the number of curb-cuts along residential streets. 		
<i>Public Facilities, Services, and Safety Element</i>			
<i>Policy PF-D.1</i>	<p>Locate, staff, and equip fire stations to meet established response times as follows:</p> <ul style="list-style-type: none"> a. To treat medical patients and control small fires, the first-due unit should arrive within 	As discussed in Section 3.1, Project Objectives, the project objectives include increasing the current and future capacity of the San Diego Fire Department by constructing a new fire station to	The project would be consistent with this policy.

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<p>7.5 minutes, 90 percent of the time from the receipt of the 911 call in fire dispatch. This equates to 1-minute dispatch time, 1.5 minutes company turnout time and 5 minutes drive time in the most populated areas.</p> <p>b. To provide an effective response force for serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911-call receipt in fire dispatch, 90 percent of the time.</p> <ul style="list-style-type: none"> • This response is designed to confine fires near the room of origin, to stop wildland fires to under 3 acres when noticed promptly, and to treat up to 5 medical patients at once. • This equates to 1-minute dispatch time, 1.5 minutes company turnout time and 8 minutes drive time spacing for multiple units in the most populated areas 	<p>serve the eastern portion of its service area to meet the San Diego Fire Department's 7 minute and 30 second response time. Impacts to public services and facilities were all deemed less-than-significant during preparation of this EIR. Refer to Section 5.13, Public Services and Facilities, for additional details.</p>	
<i>Policy PF-D.3</i>	<p>Monitor and maintain adopted service delivery objectives based on time standards for all fire, rescue, emergency response, and lifeguard services.</p>	<p>Refer to the analyses for <i>Policy PF-D.1</i>.</p>	<p>The project would be consistent with this policy.</p>

**Table 5.1-1
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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
<i>Policy PF-D.4</i>	<p>Provide adequate fire station site area (typical site is approximately 0.75 acre) and allow room for station expansion with additional considerations:</p> <ul style="list-style-type: none"> • Consider the inclusion of fire station facilities in villages or development projects as an alternative method to the acreage guideline; • Where density and development constrain site size consider a multistory station; • Acquire adjacent sites that would allow for station expansion as opportunities allow; and • Gain greater utility of fire facilities by pursuing joint use opportunities such as community meeting rooms or collocating with police, libraries, or parks where appropriate. 	<p>The project proposes the construction of a 22,443 SF four story fire station on a 1.28-acre site situated atop a canyon west of 47th Street in the City. Access to the site would be from 47th Street that borders the site to the east. The fire station features one garage and two apparatus bays (approximately 5,200 SF), an exercise room, a kitchen, and 10 bunk rooms. The project also includes a 15-stall parking lot, trash enclosure, an emergency generator, and a 1,000-gallon diesel fuel tank (see Figure 3-1, Project Site Plan). The fire station would be located in the southeast corner of the site and would occupy a 0.59-acre footprint. Correspondence with SDFD confirms that the project, by addressing a critical service gap, does not necessitate further expansions or improvements beyond its scope. The project is designed to serve future development and would not introduce a new population requiring fire protection services in the city. The project would not result in the need for new or expanded fire station facilities in order to maintain acceptable service ratios, response times, or other performance objectives.</p>	<p>The project would be consistent with this policy.</p>
<i>Policy PF-D.6</i>	<p>Provide public safety related facilities and services to assure that adequate levels of service</p>	<p>Refer to the analyses for <i>Policy PF-D.1</i> and <i>Policy PF-D.4</i>.</p>	<p>The project would be</p>

**Table 5.1-1
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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	are provided to existing and future development.		consistent with this policy.
<i>Policy PF-D.10</i>	Buffer or incorporate design elements to minimize impacts from fire stations to adjacent sensitive land uses, when feasible.	In order to reduce the grading footprint because of the project's proximity to open space, retaining walls would be constructed on the project site. The retaining wall is proposed to surround a majority of the proposed fire station, except for along the site's eastern front along 47th Street where site access would be made available.	The project would be consistent with this policy.
<i>Policy PF-D.12</i>	<p>Protect communities from unreasonable risk of wildfire within very high fire hazard severity zones.</p> <ul style="list-style-type: none"> 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. 	As discussed in Section 5.18, Wildfire, the project site is located within a Local Responsibility Area and classified as non-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 Brush Management Zone requirements. Buildings would also be designed in accordance with Title 24 California Building Standards Code related to fire safety. The project would include appropriate measures to reduce wildfire risks as conditions of approval, including pre-construction brush management to reduce potential impacts related to construction and prohibiting highly flammable landscaping materials. The project includes adequate fire flows.	The project would be consistent with this policy.

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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<p>d. Provide and maintain water supply systems to supplies for structural fire suppression.</p> <p>e. Provide adequate fire protection. (see also PF-D.1 and PF-D.2)</p>		
<i>Policy PF-D.13</i>	<p>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.</p> <p>a. Locate, design and construct development to provide adequate defensibility and minimize the risk of structural loss from wildland fires.</p> <p>b. Design development on hillsides and canyons to reduce the increased risk of fires from topography features (i.e., steep slopes, ridge saddles).</p> <p>c. Minimize flammable vegetation and implement brush management best practices in accordance with the Land Development Code.</p> <p>d. Design and maintain public and private streets for adequate fire apparatus vehicles access (ingress and egress), and install visible</p>	<p>Refer to the analysis for General Plan <i>Policy PF-D.10</i></p> <p>Additionally, as discussed in Section 5.18, Wildfire, the project site is located within a Local Responsibility Area and classified as non-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 Brush Management Zone requirements detailed in Section 5.18, Wildfire, and as determined by the San Diego Fire Rescue Department. The project would also use drought-tolerant, native landscaping as detailed in the Design Guideline. 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.</p>	<p>The project would be consistent with this policy.</p>

**Table 5.1-1
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Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	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.	As discussed in Section 5.18, Wildfire, the project would include appropriate measures to reduce wildfire risks, including pre-construction brush management and prohibiting highly flammable landscaping materials. As discussed in Section 5.13, Public Services and Facilities, impacts to public services and facilities were all deemed less-than-significant during preparation of this EIR.	
<i>Policy PF-D.14</i>	Implement brush management along City maintained roads in very high fire hazard severity zones adjacent to open space and canyon areas.	Refer to the analysis for <i>Policy PF-D.13</i> .	The project would be consistent with this policy.
<i>Policy PF-E.6</i>	Monitor how development affects average police response time goals and facilities needs (see also PF-C.5).	As discussed in Section 5.13, Public Services and Facilities, impacts to public services and facilities were all deemed less than significant.	The project would be consistent with this policy.
<i>Policy PF-E.7</i>	Maintain service levels to meet demands of continued growth and development, tourism, and other events requiring police services.	As discussed in Section 5.13, Public Services and Facilities, impacts to public services and facilities were all deemed less-than-significant during preparation of this EIR.	The project would be consistent with this policy.
<i>Policy PF-F.4</i>	Maintain conveyance and treatment capacity.	An existing sanitary sewer line is located within 47th Street. The project would connect to the existing infrastructure via two new sewer lines, a 6-inch lateral and a clarifier for the fire station, and a	The project would be consistent with this policy.

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		<p>separate sewer line for the trash enclosure drain. Wastewater collection and the City's sewage system are maintained and operated by the City's Public Utilities Department to ensure sufficient capacity is available for dry weather conditions and storm or wet weather peak-flow events.</p> <p>The project site includes an existing storm drain originating from 47th Street that daylights at the bottom of the site slope and drains offsite. The proposed project would route all stormwater runoff into an on-site biofiltration system and then into an underground detention system. The underground detention system would discharge into an existing 18-inch storm drainpipe located adjacent to 47th Street near the northeast corner of the site. Stormwater flows would be maintained at pre-development rates. As discussed in Section 5.14, Public Utilities, 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.</p>	
<i>Policy PF-F.6</i>	Coordinate land use planning and wastewater infrastructure planning to provide for future development and maintain adequate service levels.	Refer to the analysis for <i>Policy PF-F.4</i>	The project would be consistent with this policy.

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
<i>Policy PF-G.1</i>	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.	<p>As discussed in Chapter 3, Project Description, the project site includes an existing storm drain originating from 47th Street that daylights at the bottom of the site slope and drains offsite. The proposed project would route all stormwater runoff into an on-site biofiltration system and then into an underground detention system. The underground detention system would discharge into an existing 18-inch storm drainpipe located adjacent to 47th Street near the northeast corner of the site. Stormwater flows would be maintained at pre-development rates. Detention and water quality treatment facilities would be provided within all areas of proposed development in accordance with the requirements of the SDMC and San Diego Regional Water Quality Control Board MS4 permit.</p> <p>The project would not adversely affect existing drainage patterns. It was determined that development on the project site would result in an overall increase in runoff flows from the project site. The proposed development would mitigate potential 100-year flow increases from the increased impervious surface area, as needed, with detention. The project design would have Low Impact Development features that include a detention system to provide management of</p>	The project would be consistent with this policy.

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		<p>stormwater associated with development and reduce the peak runoff rates to not exceed existing conditions (Appendix F.2).</p> <p>The detention and hydromodification features would be implemented in accordance with the federal Clean Water Act and California Regional Water Quality Control Board for the San Diego region municipal stormwater NPDES permit (MS4 Permit). As discussed in Section 5.17, Water Quality, the project would adhere to the City's Stormwater Standards and would result in less-than-significant impacts to Water Quality.</p>	
<i>Policy PF-G.2</i>	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 <i>Policy PF-G.1</i>	The project would be consistent with this policy.
<i>Policy PF-G.5</i>	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 <i>Policy PF-G.1</i>	The project would be consistent with this policy.
<i>Policy PF-H.3</i>	Coordinate land use planning and water infrastructure planning with local, state, and regional agencies to provide for future	The City's Public Utilities Department would provide domestic water to the proposed project.	The project would be

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<p>development, maintain adequate service levels, and ensure adequate water supply during emergency situations.</p> <ul style="list-style-type: none"> 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. 	<p>Water service for the project site would connect to the existing 8-inch water main located in 47th Street with a measured pressure of 104 pounds per second (psi), as required by the City's Public Utilities Department. On-site domestic and irrigation water would be provided by a 2-inch water service line and meter, along with a 2.5-inch Reduced Pressure Backflow Device. Fire service would be equipped with a 6-inch water service line and a 6-inch Reduced Pressure Backflow Device and Lateral.</p> <p>As discussed in Section 5.14, Public Utilities, the project would result in less-than-significant impacts to water supplies.</p>	consistent with this policy.
<i>Policy PF-I.2</i>	Maximize waste reduction and diversion (see also Conservation Element, Policy CE-A.8).	<p>The project would implement a Waste Management Plan (WMP) for solid waste generated by the project. The project would comply with all state and local laws regarding solid waste and recycling with the preparation of a WMP. This plan provides 100% recycling of demolition waste and 75% diversion of construction waste.</p> <p>Additionally, the proposed project would be required to adhere to City ordinances, including the</p>	The project would be consistent with this policy.

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		Construction Debris Diversion Deposit Program, 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 Building Standards Code.	
<i>Policy PF-1.2.a</i>	Conveniently locate facilities and informational guidelines to encourage waste reduction, diversion, and recycling practices.	Refer to the analysis for <i>Policy PF-1.2</i> Additionally, the project would implement waste reduction by improving management and recycling programs, both during and after construction, provide permanent, adequate and convenient space to collect refuse and recyclable material.	The project would be consistent with this policy.
<i>Policy PF-1.2.f</i>	Reduce and recycle construction and demolition (C&D) debris to the extent feasible.	Refer to the analysis for General Plan <i>Policy PF-1.2</i>	The project would be consistent with this policy.
<i>Policy PF-Q.1</i>	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 CEQA	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 has the potential to expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards. Per the geotechnical investigation (see Appendix E.1), no soils or geologic conditions were encountered that	The project would be consistent with this policy.

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<p>document accompanying a discretionary action.</p> <p>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.</p> <p>g. Adhere to state laws pertaining to seismic and geologic hazards.</p>	<p>would preclude the development of the project site as proposed, with incorporation of the recommendations outlined in the geotechnical investigation.</p> <p>The geotechnical report would be prepared in accordance with the City's "Guidelines for Geotechnical Reports" and would be reviewed for adequacy by the City of San Diego Environmental Designee (ED). 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.</p>	
<i>Policy PF-Q.2</i>	<p>Maintain or improve integrity of structures to protect residents and preserve communities.</p> <p>b. Continue to consult with qualified geologists and seismologists to review geologic and seismic studies submitted to the City as project requirements.</p>	Refer to the analysis for <i>Policy PF-Q.1</i>	The project would be consistent with this policy.
<i>Conservation Element</i>			
<i>Policy CE-A.5</i>	Employ sustainable or "green" building techniques for the construction and operation of buildings.	The project would be required to comply with the 2022 California Green Building standards (CALGreen), which would substantially improve energy and water conservation, as well as	The project would be consistent with this policy.

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		operational efficiency. As part of the project design, the project would include the following sustainability elements: <ul style="list-style-type: none"> • Two Electric Vehicle (EV) charging stations. • Solar Ready Design. The proposed building would be equipped with solar ready design features that would facilitate and optimize the installation of a rooftop solar photovoltaic (PV) system, following construction of the building. PV installation would require separate approvals and permits not included in the proposed project 	
<i>Policy CE-A.7</i>	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.	As discussed in Section 5.8, Health and Safety, there are no existing structures within the project site that would require demolition that could contain hazardous materials. Any hazardous materials used during construction of the project, or during operation, would be transported, stored, 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.	The project would be consistent with this policy.
<i>Policy CE-A.10</i>	Include features in buildings to facilitate recycling of waste generated by building occupants and associated refuse storage areas.	Refer to the analysis in <i>Policy PF-I.2</i> Additionally, the project would implement waste reduction by improving management and recycling	The project would be

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<ul style="list-style-type: none"> 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. 	<p>programs, both during and after construction, and providing permanent, adequate, and convenient space to collect refuse and recyclable material. As discussed in Section 5.14, Public Utilities, the project would be adequately served by landfills and would have less-than-significant impacts on solid waste services.</p>	<p>consistent with this policy.</p>
<p><i>Policy CE-A.11</i></p>	<p>Implement sustainable landscape design and maintenance, where feasible.</p> <ul style="list-style-type: none"> a. Use integrated pest management techniques, where feasible, to delay, reduce, or eliminate dependence on the use of pesticides, herbicides, and synthetic fertilizers. b. Encourage composting efforts through education, incentives, and other activities. c. Decrease the amount of impervious surfaces in developments, especially where public places, plazas and amenities are proposed to serve as recreation opportunities. 	<p>The project would utilize integrated pest management to maintain the landscaping on the project site. The project would reduce the use of pesticides, herbicides, and synthetic fertilizers for pest management.</p> <p>Composting efforts would be maintained and would not be impacted by the project. No lawns or water-intensive plant species are proposed as part of the project. The project would maximize pervious surfaces wherever feasible.</p> <p>The project would replace the natural vegetation associated with the vacant lot with drought-resistant, native landscaping. The project design would also include on-site detention and</p>	<p>The project would be consistent with this policy.</p>

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<p>d. Strategically plant deciduous shade trees, evergreen trees, and drought tolerant native vegetation, as appropriate, to contribute to sustainable development goals.</p> <p>e. Reduce use of lawn types that require high levels of irrigation.</p> <p>f. Strive to incorporate existing trees and native vegetation into site designs.</p> <p>g. Minimize the use of landscape equipment powered by fossil fuels.</p> <p>h. Implement water conservation measures in site/building design and landscaping.</p> <p>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.</p>	hydromodification features to reduce stormwater runoff.	
<i>Policy CE-B.1</i>	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	Refer to the analysis for <i>Policy UD-A.1</i>	The project would be consistent with this policy.

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<p>between communities; or provide outdoor recreational opportunities.</p> <ul style="list-style-type: none"> 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 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. 		

Table 5.1-1
City of San Diego General Plan Consistency Review

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<p>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.</p> <p>g. Require sensitive design, construction, relocation, and maintenance of trails to optimize public access and resources conservation.</p>		
<i>Policy CE-B.4</i>	Limit and control runoff, sedimentation, and erosion both during and after construction activity.	As discussed in Section 5.6, Geologic Conditions, 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, the 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). However, with implementation of appropriate erosion and sediment control best	The project would be consistent with this policy.

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		management practices (BMPs) as part of an approved Storm Water Pollution Prevention Plan (SWPPP) and related City and NPDES requirements, erosion and sedimentation impacts from the project would be less than significant.	
<i>Policy CE-B.6</i>	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.	The project would implement the City of San Diego's Brush Management Regulations found in Section 142.0412 of the Land Development Code. The project building design would also comply with building code requirements pertaining to fire safety. The project would include additional features that would be conditions of approval, including pre-construction brush management and prohibiting the use of highly flammable plant materials in landscaping. Refer to Section 3.2.3 and 5.18 for additional details.	The project would be consistent with this policy.
<i>Policy CE-E.2</i>	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.	Refer to the analysis for <i>Policy CE-A.11</i> regarding landscaping; <i>Policy CE-B.4</i> regarding drainage and runoff; and <i>Policy UD-A.1</i> regarding the MHPA.	The project would be consistent with this policy.

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<ul style="list-style-type: none"> 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 amount of impervious surfaces through selection of materials, site planning, and street design where possible. d. Increase the use of vegetation in drainage design. e. Maintain landscape design standards that minimize the use of pesticides and herbicides. f. Avoid development of areas particularly susceptible to erosion and sediment loss (e.g., steep slopes) and, where impacts are unavoidable, enforce regulations that minimize their impacts. g. Apply land use, site development and zoning regulations that limit impacts on, and protect 		

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	the natural integrity of topography, drainage systems, and water bodies. h. Enforce maintenance requirements in development permit conditions.		
<i>Policy CE-E.3</i>	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 <i>Policy CE-B.4</i> .	The project would be consistent with this policy.
<i>Policy CE-E.6</i>	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.	Refer to the analysis for <i>Policy CE-B.4</i> .	The project would be consistent with this policy.
<i>Policy CE-F.4</i>	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 <i>Policy CE-A.11</i> .	The project would be consistent with this policy.
<i>Policy CE-F.6</i>	Encourage and provide incentives for the use of alternative to single-occupancy vehicle use,	An existing pedestrian and bicycle path network would connect to the proposed project. The project	The project would be

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	including using public transit, carpooling, vanpooling, teleworking, bicycling, and walking. Continue to implement programs to provide City employees with incentives for the use of alternatives to single-occupancy vehicles.	would construct frontage improvements including a sidewalk along 47th Street adjacent to the project site and a crosswalk to connect the site to the existing sidewalk across the street. Similarly, while there is no Municipal Code requirement for this project to provide bike parking, the project would provide two short term and two long term bike parking spaces via a bike rack, as detailed in Section 5.2, Transportation.	consistent with this policy.
<i>Policy CE-G.1</i>	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.	As detailed in Section 5.4, Biological Resources, the project is a compatible land use adjacent to the MHPA and follows the siting criteria outlined in Section 1.4.2 of the MSCP. Since there are no direct impacts to MHPA lands proposed as part of the project, in conjunction with the measures described in Section 5.4, Biological Resources, construction of the fire station would not impact the goals and objectives of the City's Subarea Plan. Therefore, the project is consistent with the guidelines and policies of the MSCP.	The project would be consistent with this policy.
<i>Policy CE-I.4</i>	Maintain and promote water conservation and waste diversion programs to conserve energy.	As mentioned in Section 5.14, Public Utilities, the project would incorporate water sustainable design features, techniques, and materials that would reduce water consumption. Drought-tolerant landscaping would include a variety of trees, shrubs, grasses, and groundcover that would be native and	The project would be consistent with this policy.

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
		<p>drought-tolerant species that would not require the excessive use of water, or pesticides and fertilizers. Irrigation of the project site would utilize irrigation applied via low precipitation rate spray heads, drip emitters, or other highly efficient systems. Landscaping would be installed in compliance with the City's Landscape Standards.</p> <p>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.</p>	
<i>Policy CE-I.5</i>	Support the installation of photovoltaic panels, and other forms of renewable energy production. Promote the use and installation of renewable energy alternatives in new and existing development.	The project would be able to accommodate the installation of rooftop photovoltaic solar panels.	The project would be consistent with this policy.
<i>Policy CE-I.10</i>	Use renewable energy sources to generate energy to the extent feasible.	The project would be able to accommodate the installation of rooftop photovoltaic solar panels.	The project would be consistent with this policy.
<i>Noise Element</i>			
<i>Policy NE-A.1</i>	Separate excessive noise-generating uses from residential and other noise-sensitive land uses	The project has considered existing and future noise levels (refer to Section 5.10, Noise). Existing noise-sensitive land uses in the project area include	The project would be

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	with a sufficient spatial buffer of less sensitive uses.	single-family residential uses and an elementary school nearby. As concluded in Section 5.10, the project would not result in the exposure of people due to current or future noise levels, which exceed standards established in the Noise Element of the General Plan.	consistent with this policy.
<i>Policy NE-A.2</i>	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 <i>Policy NE-A.1</i> .	The project would be consistent with this policy..
<i>Policy NE-A.3</i>	Limit future residential and other noise-sensitive land uses in areas exposed to high levels of noise.	Refer to the analysis for <i>Policy NE-A.1</i> .	The project would be consistent with this policy.
<i>Policy NE-A.4</i>	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 <i>Policy NE-A.1</i> .	The project would be consistent with this policy.

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
<i>Policy NE-A.5</i>	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 <i>Policy NE-A.1</i> .	The project would be consistent with this policy.
<i>Policy NE-B.4</i>	Require new development to provide facilities which support the use of alternative transportation modes such as walking, bicycling, carpooling, and, where applicable, transit to reduce peak-hour traffic.	The project would support walking as it includes improvements along the frontage of 47th Street. Further, the project would include bicycle parking.	The project would be in conformance with this policy.
<i>Policy NE-B.7</i>	Promote the use of berms, landscaping, setbacks, and architectural design where appropriate and effective, rather than conventional wall barriers to enhance aesthetics.	The project includes a retaining wall to reduce the grading footprint. The project includes heavy landscaping in front of the proposed retaining walls to enhance aesthetics. The wall would include an etched stone surface to provide a more natural look.	The project would be consistent with this policy.
<i>Policy NE-D.1</i>	Encourage noise-compatible land use within airport influence areas in accordance with federal and state noise standards and guidelines.	See Section 5.1.3.5.	The project would be in conformance with this policy.
<i>Historical Preservation Element</i>			
<i>Policy HP-A.4</i>	Actively pursue a program to identify, document and evaluate the historical and cultural resources in the City of San Diego. a. Develop context statements specific to areas being surveyed.	As discussed in Section 5.12, Historic Resources and Section 5.15, Tribal Cultural Resources, impacts would be less than significant with mitigation (MM-HIST-1) incorporated, which requires an Archaeological and Native American monitoring program, and through compliance with the	The project would be in conformance with this policy.

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<ul style="list-style-type: none"> b. Complete and regularly update a comprehensive citywide inventory of historical and cultural resources in conformance with state standards and procedures. Include community, neighborhood, cultural, and historic preservation groups, property owners, land developers, and the building industry in planning and implementing historic surveys. c. Require that archaeological investigations be guided by appropriate research designs and analytical approaches to allow recovery of important prehistoric and historic information. d. Require the permanent curation of archaeological artifact collections and associated research materials, including collections held by the City. Support the permanent archiving of primary historical records and documents now in public institutions. e. Include Native American monitors during all phases of the investigation of archaeological resources including survey, testing, 	California Native American Graves Protection and Repatriation Act.	

**Table 5.1-1
City of San Diego General Plan Consistency Review**

Goal/Policy	Goal/Recommendation	Analysis	Project Consistency
	<p>evaluation, data recovery, and construction monitoring.</p> <p>f. Treat with respect and dignity any human remains discovered during implementation of public and private projects within the City and fully comply with the California Native American Graves Protection and Repatriation Act and other appropriate laws.</p>		
<i>Environmental Justice Element</i>			
<i>Policy EJ-G.1</i>	Prioritize and allocate new and improved public facilities and services in communities with the greatest needs.	Refer to the analyses for <i>Policy PF-D.1</i> .	The project would be in conformance with this policy.

Table 5.1-2
Mid-City Communities Plan Consistency Review

Objective/Guideline	Goal/Recommendation	Analysis	Project Consistency
<i>Natural and Cultural Resources Element</i>			
<i>Goals (Faults and Liquefaction)</i>	<ul style="list-style-type: none"> Minimize development in areas prone to liquefaction. Ensure adequate building measures when development of liquefaction areas is unavoidable. 	Refer to analysis on faults and liquefaction in Section 5.6, Geological Conditions. The project site does not contain any active faults. As such, the project is not within a fault area. 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 (e.g., sandy or silty), relatively loose, and groundwater is encountered within 50 feet of the surface. Per the geotechnical investigation, the potential for liquefaction at the site is considered to be low due to the density of the underlying materials and the lack of near surface groundwater (Appendix E.1).	The project would be consistent with these goals.
<i>Goals (Soil Structure, Landslides, Shrink and Swell Characteristics)</i>	<ul style="list-style-type: none"> Avoid building construction in areas with inadequate soil conditions. 	Refer to analysis for in Section 5.6, Geological Conditions. 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 which would be incorporated into final design specifications. Further, the proposed project would be required to comply with requirements of the most current CBC, which would further reduce impacts related to geologic hazards.	The project would be consistent with this goal.
<i>Goals (Biological Resources)</i>	<ul style="list-style-type: none"> Protect canyon, hillside, and creek-side natural wildlife habitats from urban encroachment and conflicting uses. 	To minimize site grading and to incorporate the existing site topography, a portion of the building would be constructed using the existing hillside. Based on implementation of appropriate erosion and sediment control BMPs as part of, and in conformance with, an approved SWPPP and related	The project would be consistent with these goals.

Table 5.1-2
Mid-City Communities Plan Consistency Review

Objective/Guideline	Goal/Recommendation	Analysis	Project Consistency
	<ul style="list-style-type: none"> Improve and enhance riparian habitat in Chollas Creek (City Heights and Eastern Area). 	City and NPDES requirements, associated potential erosion and sedimentation impacts from implementation of the project would be less than significant (refer to analysis for in Section 5.6, Geological Conditions). The project would 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. As detailed in Section 5.4, Biological Resources, the project is a compatible land use adjacent to the MHPA and follows the siting criteria outlined in Section 1.4.2 of the MSCP. Since there are no direct impacts to MHPA lands proposed as part of the project, in conjunction with the measures described in Section 5.4, Biological Resources, construction of the fire station would be consistent with the MCCP's goals for biological resources.	
<i>Goals (Noise)</i>	<ul style="list-style-type: none"> Maintain adequate sound levels in residential neighborhoods. 	Refer to the analysis for <i>Policy NE-A.1</i> . Additionally, refer to analysis in Section 5.10, Noise.	The project would be consistent with this goal.
<i>Goals (Land Form – Canyons and Creeks)</i>	<ul style="list-style-type: none"> Preserve sensitive hillside areas. Preserve areas of native vegetation. 	The proposed fire station would be located in an area that contains undeveloped hillsides that support coastal sage scrub vegetation. The project study area and the adjacent Chollas Creek Canyon is bounded by residential development and significant roads and highways. To minimize site grading and to incorporate the existing site	The project would be consistent with these goals.

**Table 5.1-2
Mid-City Communities Plan Consistency Review**

Objective/Guideline	Goal/Recommendation	Analysis	Project Consistency
		topography, a portion of the building would be constructed using the existing hillside. The project will incorporate landscaping and a Zone 1 Defensible Space that will be lightly vegetated with a non-habitat forming, native species palette. The project has been designed to minimize project indirect impacts to native vegetation through the access route alignment and location of staging areas, the implementation of AM-BIO-1a through 1c and AM-WQ-1, and adherence to the LUAG (refer to analysis in Section 5.4, Biological Resources).	
<i>Goals (Parks and Open Space)</i>	<ul style="list-style-type: none"> • Protect biological, visual, and topographic resources. 	The proposed grading of the project site is designed to retain the majority of the site as open space, reduce the overall grading footprint, and integrate the proposed buildings into the hillside. In addition, the project does not result in significant visual impacts (see Section 5.16). The project has been designed to minimize project impacts to biological resources through the access route alignment and location of staging areas, the implementation of AM-BIO-1a through 1c and AM-WQ-1, and adherence to the LUAG (refer to analysis in Section 5.4, Biological Resources).	The project would be consistent with these goals.
<i>Goals (Archeological and Paleontological Resources)</i>	<ul style="list-style-type: none"> • Preserve areas of Mid-City possessing significant archaeological and palaeontologic interest. 	The project EIR has analyzed potential impacts regarding archaeological and Native American resources in Section 5.12, Historic Resources. The Cultural Resources Phase I Inventory Letter Report prepared for the project indicates there is a low-to-moderate sensitivity for identifying intact subsurface archaeological deposits during construction of	The project would be consistent with this goal.

**Table 5.1-2
Mid-City Communities Plan Consistency Review**

Objective/Guideline	Goal/Recommendation	Analysis	Project Consistency
		the project within areas that have not been previously disturbed. Due to the project's close proximity to Chollas Creek, the potential exists for unknown buried archeological and Native American resources to occur. Through compliance with mitigation measure MM-HIST-1 , the potential project's impacts to unknown archaeological and Native American resources would be reduced to a less-than-significant level.	
<i>Public Facilities and Service Element</i>			
<i>Goal (Fire and Life Safety)</i>	<ul style="list-style-type: none"> • To achieve and maintain a high level of fire and life safety services throughout the community. • To eliminate fire dangers, particularly in canyon areas. 	<p>The project would construct a new fire station to meet the San Diego Fire Department's response time to the eastern portion of the service area that is currently underserved.</p> <p>Additionally, as discussed in Section 5.18, Wildfire, vegetation management would occur as needed for fire safety, in compliance with the Brush Management Zone requirements as determined by the San Diego Fire Rescue Department. The project would also use drought-tolerant, native landscaping, as discussed in the Design Guidelines. 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. The project would include appropriate</p>	The project would be consistent with these goals.

**Table 5.1-2
Mid-City Communities Plan Consistency Review**

Objective/Guideline	Goal/Recommendation	Analysis	Project Consistency
		<p>measures to reduce wildfire risks as conditions of approval, including pre-construction brush management to reduce potential impacts related to construction and avoidance of highly flammable landscaping plant materials.</p> <p>The project would tie into the City's existing 8-inch water main located in 47th Street with a measured pressure of 104 pounds per second (psi), as required by the City's Public Utilities Department (refer to analysis for <i>Policy PF-H.3</i> in Table 5.1-1).</p>	
<i>Goal (Utilities)</i>	<ul style="list-style-type: none"> To provide adequate and reliable utility service while ensuring that public utilities facilities are not disruptive to the community. 	<p>Details regarding utilities is found in Section 3.2.4, Utilities. No new overhead utility wires and poles or other overhead structures are proposed as part of the project. 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.)</p>	The project would be consistent with this goal.
<i>Transportation Element</i>			
<i>Goal (Parking)</i>	<ul style="list-style-type: none"> To provide parking that is adequate for its intended use, but that does not produce negative impacts on community character by providing an oversupply of parking. 	<p>The project was reviewed by qualified transportation engineering staff in the Development Services Department to ensure adequate parking is provided. Adequate parking is provided for full-time staff, and visitor parking spaces are limited to two spaces. A total of 16 parking spaces are provided, including 2 Electric Vehicle-ready spaces, 2 ADA-compatible spaces, and 2 visitor spaces. which is adequate for the intended use. The parking area provided allows for</p>	The project would be consistent with this goal.

Table 5.1-2
Mid-City Communities Plan Consistency Review

Objective/Guideline	Goal/Recommendation	Analysis	Project Consistency
		manageable circulation during staff shift changes and thus would not constitute an oversupply of parking.	
<i>Goal (Pedestrian Circulation)</i>	<ul style="list-style-type: none">• To provide adequate sidewalks and paths.	Refer to analysis for <i>Policy ME-A.1</i> in Table 5.1-1.	The project would be consistent with this goal.

5.2 TRANSPORTATION

This section describes the existing transportation conditions of the proposed Fairmount Avenue Fire Station 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 Transportation Technical Memorandum (Appendix B) prepared by Dudek.

This section analyzes the potential impacts of the project based on CEQA Guidelines Section 15064.3(b), which focuses on the adopted VMT metric for determining the significance of transportation impacts. The passage of (SB 743 required the focus of a transportation analysis to change from level of service (LOS) or vehicle delay to VMT. The City of San Diego Transportation Study Manual (TSM, September 2022) establishes guidelines and methodology for assessing transportation impacts for development projects based on the updated CEQA Guidelines. The project site is located in the City Heights neighborhood of the Mid-City Communities Plan in the City; therefore, the following assessment is based on the City's TSM.

5.2.1 EXISTING CONDITIONS

Physical Conditions

The project site is undeveloped, surrounded by existing residential to the east and northeast, open spaces to the north and west, and an industrial area and a school situated to the south. The site is primarily characterized by undeveloped land within a suburban area of the city.

Existing Roadway Network

Existing roadways surrounding the project site include Fairmont Avenue and 47th Street. Major roadways nearby include Interstate (I) 805 and State Route (SR) 94, as shown in Figure 2-1, Project Location in Chapter 2, Environmental Setting). Regional access to the project area is provided by I-805, which runs north-south, and SR-94, which runs east-west. Both highways provide access to the larger San Diego region. The existing roadway network within and immediately surrounding the project site is summarized below.

Fairmount Avenue is a north-south, four-lane Major Collector, per the MCCP. It is a divided roadway that transitions to 47th Street near the project site and continues farther south. On-street parking is available on both sides along most of the roadway. The posted speed limit is 35 miles per hour (MPH). Fairmount Avenue is located to the west of the project site and includes the section between Home Avenue and Federal Boulevard. Sidewalks and a Class II bike lane are provided along the roadway.

47th Street is a north-south, two-lane, undivided roadway, adjacent to the project site. This roadway provides direct access to the site. Near the project site, there is a contiguous unmaintained sidewalk on the east side of the roadway but not on the west side adjacent to the project site. Near the project site, 47th Street transitions into Chollas Parkway, a two-lane, east-west, undivided roadway, that terminates near Leisureland Mobile Homes, located to the south. On-street parking is restricted along some parts of 47th Street and Chollas Parkway. There is no posted speed limit along these streets.

Existing Pedestrian Conditions

Existing pedestrian facilities surrounding the project site generally consist of sidewalks and curb ramps (see description above). The project would add a new crosswalk across 47th Street connecting the project site with the existing sidewalk located along the east side of 47th Street. The MCCP identifies the need for pedestrian improvements throughout the City Heights neighborhood, and additional pedestrian or bicycle facilities may be provided in the future.

Existing Bicycle Conditions

The City of San Diego adopted the Bicycle Master Plan (City of San Diego 2013) in December 2013. Per this plan, bicycle facilities are defined as outlined below:

- **Bike or Multi-Use Paths (Class I)** provide a separate right-of-way and are designated for the exclusive use of bicycles and pedestrians (or exclusively bicycles) with vehicle and pedestrian cross-flow minimized. Generally, the recommended pavement width for a two-directional bike or multi-use path is twelve (12) feet with two-foot-wide shoulders.
- **Bike Lanes (Class II)** provide a restricted right-of-way and are designated for bicycle use within a striped lane on a shared street or highway. Bicycle lanes are at least five (5) feet wide and should be buffered. Adjacent vehicle parking and vehicle/pedestrian cross-flow are permitted.
- **Bike Route or Signed Shared Roadways (Class III)** provide for a right-of-way designated by signs or shared lane pavement markings, or “sharrows,” for shared use with pedestrians or motor vehicles.

The Bicycle Master Plan shows an existing Class II bike lane along Fairmount Avenue between Home Avenue and Federal Boulevard, and a Class II bike lane is proposed along the entire length of Fairmount Avenue from Meade Avenue to the southern city limit. The MCCP calls for a Class I bike path in Chollas Canyon, between Federal Boulevard and College Avenue; however, no construction or paving has begun. There are no marked bike lanes along 47th Street.

Existing Transit Conditions

The San Diego Metropolitan Transit System (MTS) provides bus transit within the area of the project site. The closest MTS transit center is the Euclid Avenue Station located approximately 1.5 miles south of the site. Local MTS bus routes include 13, 916, 917, and 965. The nearest bus route to the project site is Route 13, which runs along Fairmount Avenue. The nearest bus stop is located at the intersection of Fairmount Avenue and 47th Street. Transit in the area is categorized per the following classifications (MTS 2023):

- **MTS Bus** is the main type of local bus service that is provided by MTS in the San Diego area. MTS Bus provides service at different headways (between 10 minutes to an hour or more) depending on demand and location. The project site is currently served by MTS Bus Route 13.
- **Route 13** provides service between the 24th Street Transit Center in National City to Kaiser Hospital in Allied Gardens. The nearest bus stop is located approximately 0.15 miles west of the project site, at the intersection of Fairmount Avenue and 47th Street. Route 13 provides service on weekdays from 4:30 a.m. to 11:20 p.m. with 20-minute headways and on weekends from 5:52 a.m. to 8:30 p.m. with 30-minute headways.
- **Route 916** provides loop service between the Euclid Avenue Transit Center and College Grove. The nearest bus stop to the project site is located approximately 0.85 miles south at the intersection of Euclid Avenue and Federal Boulevard. Route 916 provides service on weekdays from 6:16 a.m. to 9:35 p.m. with 30-minute headways, and on Saturdays from 6:50 a.m. to 9:07 p.m. with 60-minute headways.
- **Route 917** provides loop service between the Euclid Avenue Transit Center and College Grove, in the opposite direction of Route 916. The nearest bus stop to the project site is located approximately 0.85 miles south at the intersection of Euclid Avenue and Federal Boulevard. Route 917 provides service on weekdays from 6:16 a.m. to 9:35 p.m. with 30-minute headways, and on Saturdays from 6:50 a.m. to 9:07 p.m. with 60-minute headways.
- **Route 965** provides loop service around the City Heights, Fairmount Park, and Chollas Creek neighborhoods. The nearest bus stop is located approximately 0.70 miles northwest of the project site, at the intersection of Fairmount Avenue and Home Avenue. Route 965 provides service on weekdays from 5:00 a.m. to 9:00 p.m. with 35-minute headways, and on Saturdays from 7:00 a.m. to 7:40 p.m. with 35-minute headways.

MTS Trolley is the light rail service that connects San Diego's downtown with East County, UC San Diego, South Bay, and the Mexico border. The project site is located closest to the Orange Line.

- **Orange Line** provides service between Downtown San Diego and the City of El Cajon. The nearest station is located approximately 1.5 miles south of the project site, at the Euclid Avenue Station. The Orange Line provides service on weekdays from 4:45 a.m. to 1:30 a.m. with 15-minute headways, and on weekends from 5:15 a.m. to 1:30 a.m. with 15- and 30-minute headways.

5.2.2 REGULATORY FRAMEWORK

State

Senate Bill 743

SB 743 (Steinberg, 2013) updates the way transportation impacts are measured for new development projects under CEQA. Within the state CEQA Guidelines, these changes include the elimination of auto delay, LOS, 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 “Technical Advisory on Evaluating Transportation Impacts in CEQA,” (Governor’s Office of Planning and Research, 2018) were finalized and made effective. Guidelines Section 15064.3 and the associated OPR Technical Advisory provide that use of automobile Vehicle Miles Traveled, or VMT, as the preferred CEQA transportation metric and correspondingly eliminate auto delay/LOS as the metric for assessing transportation impacts under CEQA. The City adopted its own guidelines for VMT analysis and significance thresholds in compliance with SB 743 – these guidelines are contained in the City’s TSM and the City’s CEQA Significance Determination Thresholds (City of San Diego 2022).

Technical Advisory on Evaluating Transportation Impacts in CEQA

The “Technical Advisory on Evaluating Transportation Impacts in CEQA” document is one in a series of advisories currently provided by LCI as a service to professional planners, land use officials, and CEQA practitioners. This advisory contains technical recommendations regarding the assessment of VMT-related impacts, thresholds of significance, and mitigation measures. LCI issues technical assistance on issues that broadly affect the practice of land use planning and the CEQA (California Public Resources Code, Section 21000 et seq.; Government Code Sections 65040[g], [l], [m]). The purpose of the technical advisory document is to provide advice and recommendations, which agencies and other entities may use at their discretion. The document does not alter lead agency discretion in preparing environmental documents subject to CEQA and as stated above, the City has prepared its own technical guidelines for evaluating VMT in the TSM.

Local

City of San Diego General Plan

Blueprint SD is a refresh of the City's 2008 General Plan to address the City's 2022 Climate Action Plan and SANDAG's 2021 Regional Plan. As mentioned in the General Plan Mobility Element (July 2024), the goal of the Mobility Element is to achieve a balanced, multi-modal transportation system network that allows people to move around safely, conveniently, and enjoyably, and minimizes environmental and neighborhood impacts for people. It contains policies that help walking/rolling, bicycling, and using shared mobility devices for short trips, and for transit to link highly frequented destinations more efficiently. It also includes a vision for improving existing streets consistent with Complete Streets planning principles and concepts that will result in dynamic, vibrant corridors that support all modes of travel. Other areas include Intelligent Transportation Systems, Transportation Demand Management, Parking and Curb Space Management, Airports, Goods Movement/Freight, Regional Coordination and Financing, and Emerging Technologies. The applicable policies from the Mobility Element are listed below:

- ME-A.4.** Make sidewalks and street crossings accessible to pedestrians of all abilities.
- ME-A.5.** Provide adequate sidewalk widths and clear path of travel as determined by street classification, adjoining land uses, and expected pedestrian usage.
- ME-A.6.** Work toward achieving a complete, functional, and interconnected pedestrian network.
- ME-E.5.** Identify the general location and extent of streets, sidewalks, trails, and other transportation facilities and services needed to enhance mobility in community plans.
- ME-E.9.** Improve operations and maintenance on City streets and sidewalks.
- ME-E.13.** Implement street design improvements and operational measures for E ME-58 | Mobility Element | July 2024 City of San Diego General Plan | ME-59 systemic safety, which account for human error and injury tolerance, and support the Vision Zero program.
- ME-F.8.** Support the upgrade of communications systems and signal controllers to improve traffic congestion and safety.
- ME-G.5.** Support SANDAG's efforts to market TDM benefits to employers and identify strategies to reduce peak period employee commute trips.

- ME-H.1.** Provide and manage parking so that it is reasonably available when and where it is needed.

Mid-City Communities Plan

The MCCP sets forth goals, policies, and proposals to guide future development within the Mid-City, and the City Heights Neighborhood. The Transportation Element of the Plan provides the overall goal to construct and maintain an adequate system for transit, vehicular, bicycle and pedestrian circulation within the community while providing adequate access to the larger San Diego region. A vision statement, goals and specific recommendations included in the Plan provide for the following topics: Traffic Circulation, Parking, Mass Transit, Bikeways and, Pedestrian Circulation.

- To provide an adequate traffic circulation system that is balanced with the character and multi-modal tendencies of the community.
- To provide parking that is adequate for its intended use, but that does not produce negative impacts on community character by providing an oversupply of parking.
- To provide accessible public transit service for all residents, employees, shoppers and visitors to Mid-City.
- To provide a high level of public transit service along major corridors.
- To provide direct public transit access to major regional employment centers.
- To provide adequate sidewalks and paths.

The MCCP also includes a vision statement to “encourage and enhance pedestrian and bicycling as effective modes of personal transportation.” The approved bicycle system within the vicinity of the project site identifies primarily Class II Bike Lanes along the major roadways including Fairmont Avenue, 54th Street, Chollas Parkway, College Grove, Federal Boulevard, and Monroe Avenue. No bike lanes are proposed along 47th Street.

City of San Diego Bicycle Master Plan

The 2013 City of San Diego Bicycle Master Plan presents a bicycle network, projects, policies, and programs for improving bicycling through 2030 and beyond, consistent with the City’s General Plan mobility, sustainability, health, economic, and social goals. The goals 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 General Plan Mobility Element policies to help bicycling become a more viable transportation mode in the city for trips of less than five miles, to connect to transit, and for recreation.

An existing Class II facility is located along Fairmount Avenue. There are no proposed high priority projects within the project area (City of San Diego 2013).

City of San Diego Pedestrian Master Plan

The City of San Diego Final Draft Pedestrian Master Plan (City of San Diego 2015) was prepared to establish a multi-year framework for planning pedestrian improvements within the public right-of-way, thus fostering walkable communities consistent with the City of San Diego General Plan Mobility Element policies. Walkable communities have broad benefits-- fostering healthy lifestyles, creating human-scale interaction and defensible space, connecting important public spaces, providing access to and supporting transit, and supporting sustainability goals.

The Project is not within any identified Project Corridors, nor is the Project adjacent to any intersection project locations within the Pedestrian Master Plan. No pedestrian priority Focus Areas or Improvement Areas were identified near the project site in the City Heights neighborhood in the Pedestrian Master Plan Volume 2A – Urban Core Communities.

City of San Diego Mobility Master Plan

The City has adopted a Mobility Master Plan (City of San Diego 2025). This plan functions as a tool to implement mobility improvements, services, and programs that align with the City's CAP, General Plan, and Community Plans. This plan brings together mobility ideas, needs, and a focused subset of unbuilt projects and recommendations from previous planning efforts to establish processes related to consolidating mobility information and strategically implementing improvements that would eventually be applied citywide. This Plan has been developed to serve as a template for future Mobility Master Plan iterations.

The project is not within any focus areas within the Mobility Master Plan, and the Project is located south of Focus Area 3. Focus Area 3 includes parts of Uptown, North Park, and City Heights. The Mobility Master Plan includes a City Project adjacent to the proposed Project area, specifically, "Implement a bikeway on 43rd St from Meade Ave to Ridge View Dr." The bikeway would be immediately to the north of the proposed Project and would not be impacted by the Project.

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?*

Threshold

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

Impact

As described in Section 5.1, Land Use, the project has demonstrated consistency with the City's General Plan, Mobility Element and MCCP related to transportation goals and policies (refer to Table 5.1-1).

The project does not propose to construct or realign existing roadways within the city. The project would be accessed via two new driveways along 47th Street, as shown on Figure 3-1, Project Site Plan, in Chapter 3, Project Description. The project would construct frontage improvements including a sidewalk along 47th Street adjacent to the project site and a crosswalk to connect the site to the existing sidewalk across the street consistent with the MCCP goal of providing adequate sidewalks.

The project would not add a significant number of vehicle trips to the local roadways (see Issue 2 below). The fire trucks and other emergency vehicles would operate and respond to fire and non-fire emergency calls, per the City's established protocol and procedures followed by emergency services. The project would also construct frontage improvements along 47th Street per City standards. The project does not propose any change or modification to existing bike facilities and transit service in the area. Bicycle parking spaces would be located at the project's visitor entrance.

The project would not conflict with or impede implementation of a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.

Significance of Impact

The project would not substantially alter the present roadway, bicycle, or transit in the area. The project would construct a sidewalk along 47th Street adjacent to the project site and a crosswalk to connect the site to the existing sidewalk across the street, consistent with the M CCP. Additionally, the project would not conflict with adopted policies, plans or programs addressing the city's pedestrian, bicycle, transit, or roadway transportation system. Impacts would be **less than significant**.

Mitigation

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?

The CEQA Guidelines state that "VMT is the most appropriate measure of transportation impacts" and define VMT as "the amount and distance of automobile travel attributable to a project." It should be noted that "automobile" refers to on-road passenger vehicles, specifically cars and light trucks. LCI has clarified in its Technical Advisory and recent informational presentations that heavy-duty truck VMT is not required to be included in the estimation of a project's VMT. Other relevant considerations may include the effects of the project on transit and non-motorized travel (e.g., pedestrians and bicyclists).

Thresholds

The methodology and significance criteria for determining VMT transportation impacts in the city are contained in the City's TSM, which was approved by the City Council on November 9, 2020. The TSM outlines the following process for performing a VMT 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 VMT to the significance criteria to determine if there is VMT transportation impact.
4. If there is an impact, identify mitigation measures to reduce the project impact.

Impact

Project Type and Trip Generation

The project is proposing the construction of a 22,443-square-foot fire station building and associated site improvements including driveways, parking, an emergency diesel generator and fuel storage areas, and landscaping. During project operation, the fire station would support a total of 12 firefighters and rescue staff (two [2] crews of four [4] firefighters in each fire apparatus, and one [1] ambulance crew of two [2] in an ambulance). The firefighters work 24-hour shifts, and the ambulance crew works either 12 or 24-hour shifts per day. When a call is received and fire trucks are dispatched, vehicles would exit onto 47th Street and head towards the 47th Street and Fairmount Avenue intersection. The traffic signal at the 47th Street and Fairmount Avenue intersection would be controlled by the engine operator so all vehicles heading north/south on Fairmount Avenue would be required to stop to allow fire truck access.

The San Diego Association of Governments (SANDAG) *Brief Guide of Vehicular Trip Generation Rates for the San Diego Region*, April 2002 does not include a trip rate for a Fire Station. The trip rate for a Fire Station in the Institute of Transportation Engineers (ITE) Trip Generation Manual provides only a PM peak hour rate. The project's trip generation estimates were developed based on operational data for crew members, vehicles, and projected emergency responses provided by the City's Fire Rescue Team.

In 2023, the San Diego Fire-Rescue Department¹ reported 183,350 responses within the city and aid to other agencies/cities which included fire, rescue, life-threatening and non-life threatening, urgent, hazard, service, events and other categories of responses. Based on information provided by Fire Rescue Response, an average of fifteen emergency response calls per day are estimated for the project (City of San Diego Fire-Rescue Department 2024). The project's trip generation has been estimated assuming eight calls would be fire-related and require two vehicles to respond to the emergency, and seven calls would be non-fire-related emergencies and require only one vehicle. The estimated trip generation for the project is provided in Table 5.2-1.

¹ <https://www.sandiego.gov/fire/about/firestations>

**Table 5.2-1
Project Trip Generation**

Trip Type	Numbers/ Units	Daily Unadjusted Driveway Trips	AM Peak Hour			PM Peak Hour		
			<i>In</i>	<i>Out</i>	<i>Total</i>	<i>In</i>	<i>Out</i>	<i>Total</i>
Crew Member ¹	8 members	16	8	8	16	0	0	0
Ambulance Crew ¹	2 members	8	2	2	4	2	2	4
Emergency Responses - Fire ²	8 incidents	32	1	1	2	1	1	2
Emergency Responses - Non Fire ²	7 incidents	14	1	0	1	0	1	1
Non-Emergency ³	2 members	4	0	0	0	0	0	0
Deliveries ³	2 trucks	4	0	0	0	0	0	0
Total Employee Trips		24	10	10	20	2	2	4
Total Other Trips		46	2	1	3	1	2	3
Total Trip Generation		70	12	11	23	3	4	7

- ¹ Per the project description, there would be a maximum of 12 crew members consisting of 2 crews of 4 fire fighting members each and one ambulance crew of two (2), at the Fire Station. Firefighters work 24-hour shifts, and the ambulance crew works 12-hour shifts per day. Crew members would generate one daily trip (inbound and one outbound). Some crew members were assumed to commute in the AM and PM peak hours.
- ² The projections for the number of emergency calls were provided by the City's Fire Rescue. A maximum of 15 emergency responses per day are presumed, of which 8 are presumed to be fire-related responses. Emergency responses would require two vehicles i.e. a ladder truck or an engine, and an ambulance. Therefore, two vehicles and two trips per vehicle (one inbound and one outbound) are assumed to estimate daily trips per fire-related emergency response. Other incidents or non-fire emergencies would require only one vehicle. Therefore, two trips per vehicle (one inbound and one outbound) are assumed to estimate daily trips per non-fire emergency or incident. It is not possible to estimate how many emergencies would occur during the peak hours. Therefore, the daily trips for emergency responses are distributed evenly over the duration of 24 hours to estimate the AM and PM peak hour trips.
- ³ A small number of non-emergency and delivery trips would occur on a daily basis. No trips were assumed to occur during the peak hour.

As shown in the table, the project would generate 70 daily unadjusted driveway trips. A screening analysis has been prepared for LMA and VMT using the City's Project Information Form (PIF) (Appendix B). Per the City's TSM, a Local Mobility Analysis (LMA) would be required if a project generates more than 500 daily unadjusted driveway trips and is inconsistent with the community plan or zoning or if the project generates more than 1,000 daily trips and is consistent with the community plan and zoning. Based on the estimate of project trips shown in Table 5.2-1, an LMA would not be required.

Based on LCI's Technical Advisory, the City's adopted TSM has VMT-specific guidelines, screening criteria and thresholds. A project that meets at least one of the screening criteria would be presumed to have a less-than-significant VMT impact. Per screening criteria included in the TSM, a locally serving public facility (such as transit centers, public schools, libraries, post offices, park-and-ride lots, police and fire facilities, and government offices) is presumed to have a less-than-significant VMT impact. The project is a fire station and is considered a locally serving public facility as defined in the TSM. Therefore, the project would not be required to evaluate VMT, and impacts can be presumed to be less than significant. Additionally, as shown in Table 5.2-1 and Appendix B "Trip Generation and VMT Screening Analysis for the Fairmount Avenue Fire Station," the project would generate 70 daily unadjusted driveway trips. Because the project would generate less than 300 daily trips, it would also be considered a Small Project per City's VMT screening criteria and presumed to have a less than significant VMT impact.

Significance of Impact

Impacts associated with VMT would be **less than significant**.

Mitigation

No mitigation would be required.

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)?*

Threshold

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

Impact

Vehicular access to the project site would be provided via two driveways (or aprons) from 47th Street. Inbound and outbound emergency vehicles would use the 40-foot-wide driveway apron, which provides access to the fire apparatus bay, and all other vehicles would use the 20-foot-wide driveway, which leads to the on-site parking area. Vehicular access to the project site would be provided via 47th Street, as shown in Figure 3-1. All Inbound and outbound emergency vehicles would exit the site onto 47th Street and head west towards the Fairmount Avenue/47th Street intersection. Passenger cars and other vehicles and service vehicles, such as garbage trucks, would

enter and exit the site via the northern driveway along 47th Street and use the parking lot provided on the north side of the project site. The Fairmount Avenue/47th Street intersection is signalized and has pedestrian crosswalks on all three legs with a pedestrian push button and curb ramps.

The following measures would help facilitate the operation of fire engine and other emergency vehicles at the Fairmount Avenue/47th Street intersection and project driveways and would help manage traffic during project construction:

- The traffic signal at the 47th Street and Fairmount Avenue intersection would be controlled by the engine operator to prioritize emergency vehicles coming from 47th Street.
- All regulatory and warning signs installed would be consistent with the current California Manual on Uniform Traffic Control Devices (MUTCD) standards and guidelines.
- The project would provide proper pavement markings and associated stop bars at the project aprons/driveways.
- Provide adequate sight distance at the project driveways by ensuring that fences, monuments, signs, landscaping, walls and slopes do not obstruct the line of sight for all vehicle drivers including cars and trucks.
- Any proposed landscaping at the project driveways along 47th Street would be set back sufficiently so as not to create any sight distance constraints at the access driveways.
- As shown on the site plan (see Figure 3-1 in Chapter 3, Project Description), the fire station building would be set back to provide adequate throat depth on-site for outbound emergency vehicles.
- Construction equipment and materials would be staged on-site and at an off-site location (see Figure 3-7, Off-site Construction Staging in Chapter 3, Project Description), approximately 0.40 miles southwest of the project site.

For any encroachment into the public right-of-way including sidewalks, parking spaces, and medians during construction, a traffic control plan/permit conforming to the latest edition of the City of San Diego, Development Services Information Bulletin 177 would be submitted using the User Guide for OTC Traffic Control Permit Submittal (City of San Diego 2021). With above mentioned features, access to the project site would be designed to provide for the safe movement of passenger cars and emergency vehicles and would not include any hazardous design features or propose any incompatible uses. Impacts would be less than significant.

Significance of Impact

Impacts associated with an increase in hazards due to a design feature or incompatible use would be **less than significant**.

Mitigation

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?*

Threshold

Based on the City's Significance Determination Thresholds (City of San Diego 2022), the City's TSM should be used to determine the significance of a project, plan, or policy's transportation impact.

Impact

Construction of the project is not anticipated to require road closures in public rights-of-way or driveway closures that could impede emergency access along 47th Street; all construction staging would be within the project site or at an off-site location approximately 0.40 miles southwest of the project site. For any lane closures or sidewalk closures during construction, a traffic control plan would be prepared. Upon completion, vehicular access to the project site would be via 47th Street, as shown in Figure 3-1. During operation the project would improve accessibility to emergency fire protection resources. The project would be designed and constructed per applicable fire station design standards and comply with the emergency access requirements of the fire department and the City. Additionally, the project is subject to review by the San Diego Fire-Rescue and the City of San Diego ED to ensure compliance with applicable building safety standards. Therefore, construction or operation of the project would not result in inadequate emergency access, and impacts would be less than significant.

Significance of Impact

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

Mitigation

No mitigation would be required.

5.3 AIR QUALITY AND ODOR

This section describes the existing air quality conditions of the proposed Fairmount Avenue Fire Station Project (project) site, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if applicable, related to implementation of the project.

The following discussion is based on the air quality and greenhouse gas emissions technical report, prepared by Dudek (October 2024) and included as Appendix C.

5.3.1 EXISTING CONDITIONS

Physical Conditions

The project site is undeveloped vacant land, located in the City of San Diego (City), which is within the central portion of San Diego County. Refer to Chapter 2, Environmental Setting, for additional details regarding the site conditions and surrounding community features.

Site Planning

The project site is designated Industrial Employment in the City's General Plan and zoned Open Space (OP-2-1) and Residential-Single Unit (RS-1-7). The project site is currently designated as Industrial in the M CCP, while the proposed off-site improvements would be within the 47th Street right-of-way and also within a temporary construction staging area located approximately 0.4 miles southwest of the site. Overall, the site is designated for industrial uses while the zoning indicates the site is planned for open space and residential uses.

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 in 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 degrees Fahrenheit (°F)) from the high-40s to the mid 70s. Most of the region's precipitation falls from November to April with infrequent precipitation occurring 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 (Western Regional Climate Center 2016).

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, or Santa Ana winds.

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 below.

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.

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. Smog is a combination of smoke and other particulates, O_3 , hydrocarbons, oxides of nitrogen (NO_x) and other chemically reactive compounds which, under certain conditions of weather and sunlight, may result in a murky brown haze that causes adverse health effects (CARB 2024a).

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.

Under certain conditions, atmospheric oscillation results in the offshore transport of air from the Los Angeles region to San Diego County. This often produces high O_3 concentrations, as measured

at air pollutant monitoring stations within the County. The transport of air pollutants from Los Angeles to San Diego has also occurred within the stable layer of the elevated subsidence inversion, where high levels of O₃ are transported.

Sensitive Receptors

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.

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 CARB, include children, older adults, and people with cardiovascular and chronic respiratory diseases. According to the SDAPCD, sensitive receptors are those who are especially susceptible to adverse health effects from exposure to toxic air contaminants, such as children, the elderly, and the ill. According to the City of San Diego CEQA Thresholds, examples of sensitive receptors include medical patients, elderly persons, athletes, students, and children within long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, medical patients in residences, schools, playgrounds, childcare centers, and athletic facilities. The Thresholds also state to consider sensitive receptors in locations such as day care centers, schools, retirement homes, and hospitals or medical patients in residential homes close to major roadways or stationary sources, which could be impacted by air pollutants (City of San Diego 2022).

The closest sensitive receptors are single-family residences for 55-and-older residents, located approximately 70 feet to the east of the project site. The closest school is Webster Elementary School located approximately 450 feet to the southeast of the project site.

Criteria Pollutants

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards (criteria) for outdoor concentrations to protect public health. The federal and state standards have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. In general, criteria air pollutants include the following compounds:

- Ozone (O₃)
- Reactive organic gases (ROGs) or volatile organic compounds (VOCs)
- Carbon Monoxide (CO)
- Nitrogen Dioxide (NO₂)
- Particulate Matter (PM₁₀) and fine particulate matter (PM_{2.5})
- Sulfur dioxide (SO₂)
- Lead (Pb)
- Sulfates

- Vinyl chloride
- Hydrogen sulfide
- Visibility-reducing particles

The following provides a brief summary of criteria air pollutants and non-criteria pollutants that could be generated by construction and operation of the project and are analyzed herein. Please refer to Appendix C for a more detailed discussion of all criteria air pollutants and non-criteria pollutants.¹

Ozone. O₃ is a strong-smelling pollutant formed in the atmosphere by a photochemical process involving the sun's energy and O₃ precursors. The O₃ that the U.S. Environmental Protection Agency (EPA) and CARB regulate as a criteria air pollutant is produced close to the ground level, where people live, exercise, and breathe. Ground-level O₃ is a harmful air pollutant that causes numerous adverse health effects and is, thus, considered "bad" O₃. Stratospheric, or "good," O₃ occurs naturally in the upper atmosphere, where it reduces the amount of ultraviolet light (i.e., solar radiation) entering the Earth's atmosphere.

O₃ in the troposphere causes numerous adverse health effects; short-term exposures (lasting for a few hours) to O₃ at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. These health problems are particularly acute in sensitive receptors such as the sick, the elderly, and young children.

Nitrogen Dioxide and Oxides of Nitrogen. In atmospheric chemistry, NO_x is shorthand for nitric oxide (NO) and nitrogen dioxide (NO₂), the nitrogen oxides that are most relevant for air pollution. NO₂ is a brownish, highly reactive gas that is present in all urban atmospheres. NO₂ can irritate the lungs, cause bronchitis and pneumonia, and lower resistance to respiratory infections. NO_x is formed from fuel combustion under high temperature or pressure and is an important precursor to acid rain. The two major emissions sources of NO_x are transportation and stationary fuel combustion sources, such as electric utility and industrial boilers.

Carbon Monoxide. CO is a colorless, odorless gas formed by the incomplete combustion of hydrocarbon, or fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, automobile exhaust accounts for the majority of CO emissions. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, which is a typical situation at dusk in urban areas from November to February. The highest levels of CO typically occur during the colder months of the year, when inversion conditions are more frequent.

¹ The following descriptions of health effects for each of the criteria air pollutants associated with project construction and operations are based on the U.S. Environmental Protection Agency's "Criteria Air Pollutants" (EPA 2024) and the California Air Resources Board's "Glossary" (CARB 2024b) published information.

The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions.

Sulfur Dioxide. SO₂ is a colorless, pungent gas that is produced from coal and oil used in power plants and industries. SO₂ concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO₂ and limits on the sulfur content of fuels. SO₂ is an irritant gas that attacks the throat and lungs and can cause acute respiratory symptoms and diminished ventilator function in children. When combined with particulate matter, SO₂ can injure lung tissue and reduce visibility and the level of sunlight.

Particulate Matter. Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. PM_{2.5} and PM₁₀ represent fractions of particulate matter. Coarse particulate matter (PM₁₀) consists of particulate matter that is 10 microns or less in diameter (about 1/7 the thickness of a human hair). Major sources of PM₁₀ include crushing or grinding operations; dust stirred up by vehicles traveling on roads; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; and windblown dust from open lands. Fine particulate matter (PM_{2.5}) consists of particulate matter that is 2.5 microns or less in diameter (roughly 1/28 the diameter of a human hair). PM_{2.5} results from fuel combustion (e.g., from motor vehicles and power generation and industrial facilities), residential fireplaces, and woodstoves.

PM_{2.5} and PM₁₀ pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM_{2.5} and PM₁₀ can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections.

People with influenza, people with chronic respiratory and cardiovascular diseases, and the elderly may suffer worsening illness and premature death as a result of breathing particulate matter. People with bronchitis can expect aggravated symptoms from breathing in particulate matter. Children may experience a decline in lung function due to breathing in PM₁₀ and PM_{2.5}.

Volatile Organic Compounds. Hydrocarbons are organic gases that are formed from hydrogen and carbon and sometimes other elements. Hydrocarbons that contribute to formation of O₃ are referred to and regulated as VOCs (also referred to as reactive organic gases). Combustion engine exhaust, oil refineries, and fossil-fueled power plants are the primary sources of hydrocarbons.

High levels of VOCs in the atmosphere can interfere with oxygen intake by reducing the amount of available oxygen through displacement.

Non-Criteria Pollutants

Toxic Air Contaminants (TACs). A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute and/or chronic non-cancer health effects. A toxic substance released into the air is considered a TAC. TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act. This two-step process of risk identification and risk management and reduction was designed to protect residents from the health effects of toxic substances in the air.

TACs are generated by a number of sources, including stationary sources, such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources, such as automobiles; and area sources, such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic (i.e., short-term [acute] or long-term [chronic]) effects.

Diesel Particulate Matter. Diesel particulate matter (DPM) is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks. More than 90% of DPM is less than one micrometer in diameter (is a subset of PM_{2.5} (CARB 2024c). DPM is typically composed of carbon particles (“soot,” also called black carbon) and numerous organic compounds, including over 40 known cancer-causing organic substances. CARB classified “particulate emissions from diesel-fueled engines” (i.e., DPM) (17 CCR 93000) as a TAC in August 1998. DPM is emitted from a broad range of diesel engines, including on-road diesel engines from trucks, buses, and cars and off-road diesel engines from locomotives, marine vessels, and heavy-duty construction equipment, among others. Approximately 70% of all airborne cancer risk in California is associated with DPM (CARB 2000). Because it is part of PM_{2.5}, DPM also contributes to the same non-cancer health effects as PM_{2.5} exposure. These effects include premature death; hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma; increased respiratory symptoms; and decreased lung function in children. Those most vulnerable to non-cancer health effects are children whose lungs are still developing and the elderly who often have chronic health problems.

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. 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.

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 is 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 CAA 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	
	<i>Federal Standards</i>	<i>State Standards</i>
Ozone (O ₃) – 1 hour	Attainment ^a	Nonattainment
O ₃ – (8 hour)	Nonattainment	Nonattainment
Nitrogen Dioxide (NO ₂)	Unclassifiable/attainment	Attainment
Carbon Monoxide (CO)	Attainment	Attainment
Sulfur Dioxide (SO ₂)	Unclassifiable/attainment	Attainment
Coarse Particulate Matter (PM ₁₀)	Unclassifiable ^b	Nonattainment
Fine Particulate Matter (PM _{2.5})	Unclassifiable/attainment	Nonattainment^c
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: SDAPCD 2024.

Notes: Attainment = meets the standards; Nonattainment = does not meet the standards; Unclassified or Unclassifiable = insufficient data to classify;

^a The federal 1-hour standard of 0.12 parts per million (ppm) was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in State Implementation Plans.

^b At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.

- ^c CARB has not reclassified the region to attainment yet due to (1) incomplete data, and (2) the use of non-California Approved Samplers (CAS). While data collected does meet the requirements for designation of attainment with federal PM_{2.5} standards, the data completeness requirements for state PM_{2.5} standards substantially exceed federal requirements and mandates, and have historically not been feasible for most air districts to adhere to given local resources. SDAPCD has begun replacing most regional filter-based PM_{2.5} monitors as they reach the end of their useful life with continuous PM_{2.5} air monitors to ensure collected data meets stringent completeness requirements in the future. APCD anticipates these new monitors will be approved as “CAS” monitors once CARB reviews the list of approved monitors, which has not been updated since 2013.

In summary, the SDAB is designated as an attainment area for the 1997 8-hour O₃ NAAQS and as a nonattainment area for the 2008 8-hour O₃ NAAQS. The SDAB is designated as a nonattainment area for O₃, PM₁₀, and PM_{2.5} CAAQS. The portion of the SDAB where the proposed 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

Local ambient air quality is monitored by SDAPCD for compliance with the CAAQS and the NAAQS. The nearest SDAPCD-operated monitoring station to the proposed project is the Sherman Elementary School monitoring station, located approximately 3 miles southwest of the project site. This station monitors O₃, NO₂, and PM_{2.5}. The El Cajon monitoring station is the closest monitoring station for CO and SO₂, and is located approximately 10 miles northeast of the project site. The closest monitoring station for PM₁₀ is the Chula Vista monitoring station, located approximately 6.75 miles south. As detailed in Appendix C, monitoring data from 2021-2023 show that 8-hour O₃ concentrations exceeded the state standards at the Sherman Elementary School monitoring station in 2023. All other air quality levels at the local monitoring stations were in compliance with the CAAQS and NAAQS.

5.3.2 REGULATORY FRAMEWORK

Please see Appendix C for a detailed overview of all federal and state regulations adopted to improve air quality. The following summarizes regulations applicable to the project.

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. The EPA is responsible for implementing most aspects of the CAA, including setting 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 O₃ protection, and enforcement provisions.

Under the CAA, NAAQS are established for the following criteria pollutants: O₃, CO, NO₂, SO₂, PM₁₀, 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 the 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.

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 implementation of the California Clean Air Act of 1988, responding to the federal CAA and regulating emissions from motor vehicles and consumer products.

CARB has established CAAQS, which are generally more restrictive than the NAAQS. The NAAQS and CAAQS are presented in Table 5.3-2.

Table 5.3-2. Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards^a	National Standards^b	
		<i>Concentration^c</i>	<i>Primary^{c,d}</i>	<i>Secondary^{c,e}</i>
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	
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	—

Table 5.3-2. Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards ^a	National Standards ^b	
		Concentration ^c	Primary ^{c,d}	Secondary ^{c,e}
	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	—	—
Visibility reducing particles ^l	8 hour	See footnote l	—	—

Source: CARB 2024d.

Notes: O₃ = ozone; ppm = parts per million by volume; µg/m³ = micrograms per cubic meter; NO₂ = nitrogen dioxide; CO = carbon monoxide; mg/m³ = milligrams per cubic meter; SO₂ = sulfur dioxide; PM₁₀ = 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 O₃, CO, SO₂ (1-hour and 24-hour), NO₂, suspended particulate matter (PM₁₀, 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 O₃, NO₂, SO₂, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once per year. The O₃ 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 PM₁₀, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ 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 O₃ 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 SO₂ 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 SO₂ 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 12.0 µg/m³ to 9.0 µg/m³. The existing national 24-hour PM_{2.5} standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM₁₀ standards (primary and secondary) of 150 µg/m³ were also retained. The form of the annual primary and secondary standards is the annual mean averaged over three years.
- ^j The ARB 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 µg/m³ 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.
- ^l In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

Toxic Air Contaminants

The state Air Toxics Program was established in 1983 under AB 1807 (Tanner). The California TAC list identifies more than 200 pollutants, of which carcinogenic and noncarcinogenic toxicity criteria have

been established for a subset of these pollutants pursuant to the California Health and Safety Code. In accordance with AB 2728, the state list includes the (federal) HAPs (hazardous air pollutants). The Air Toxics “Hot Spots” Information and Assessment Act of 1987 (AB 2588) seeks to identify and evaluate risk from air toxics sources; however, AB 2588 does not regulate air toxics emissions. TAC emissions from individual facilities are quantified and prioritized. “High-priority” facilities are required to perform a health risk assessment (HRA), and if specific thresholds are exceeded, are required to communicate the results to the public in the form of notices and public meetings.

In 2000, CARB approved a comprehensive Diesel Risk Reduction Plan to reduce diesel emissions from both new and existing diesel-fueled vehicles and engines. The regulation was anticipated to result in an 80% decrease in statewide diesel health risk in 2020 compared with the diesel risk in 2000. Additional regulations apply to new trucks and diesel fuel, including the On-Road Heavy Duty Diesel Vehicle (In-Use) Regulation, the On-Road Heavy Duty (New) Vehicle Program, the In-Use Off-Road Diesel Vehicle Regulation, and the New Off-Road Compression-Ignition (Diesel) Engines and Equipment Program. All of these regulations and programs have timetables by which manufacturers must comply and existing operators must upgrade their diesel-powered equipment. Several Airborne Toxic Control Measures reduce diesel emissions, including In-Use Off-Road Diesel-Fueled Fleets (13 CCR 2449 et seq.) and In-Use On-Road Diesel-Fueled Vehicles (13 CCR 2025).

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, O₃ and particulate matter are the pollutants of main concern since exceedances of state ambient air quality standards for those pollutants have been observed in most years. For this reason, the SDAB has been designated as a nonattainment area for the state PM₁₀, PM_{2.5}, and O₃ standards. The SDAB is also a federal O₃ attainment (maintenance) area for 1997 8-hour O₃ standard, an O₃ nonattainment area for the 2008 8-hour O₃ standard, and a CO maintenance area (western and central part of the SDAB only, including the project site).

Federal Attainment Plans

In November 2020, SDAPCD adopted the Air Quality Management Plan for attaining the federal 8-hour 75 parts per billion (ppb) and 70 ppb Ozone standards (2020 Attainment Plan), which is the SDAB's input to the SIP and required to demonstrate how the SDAPCD proposes to attain the federal ozone standards. The plan anticipates attainment of the 75 ppb and 70 ppb NAAQS standards by 2026 and

2032, respectively. The 2020 Attainment Plan establishes planning requirements for attaining the O₃ NAAQS, including on-road motor vehicle emissions budgets for transportation conformity, a vehicle miles traveled (VMT) offset demonstration, Reasonably Available Control Measures, Reasonable Further Progress, an Attainment Demonstration, and contingency measures in the event of a failure to meet a milestone or to attain by the predicted attainment date (SDAPCD 2020a).

State Attainment Plans

SDAPCD and the 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 Regional Air Quality Strategy (RAQS) for the SDAB was initially adopted in 1991 and is updated every 3 years, most recently in 2022 (SDAPCD 2023). The RAQS outlines SDAPCD's plans and control measures designed to attain the CAAQS for O₃. 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. The 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.

On March 9, 2023, SDAPCD adopted the revised 2022 RAQS for the County. The RAQS plan demonstrates how the San Diego region will further reduce air pollution emissions to meet state health-based standards for ground-level O₃. The 2022 RAQS guides SDAPCD in deploying tools, strategies, and resources to continue reducing pollutants that are precursors to ground-level O₃, including NO_x and VOC. The 2022 RAQS emphasizes O₃ control measures but also identifies complementary measures and strategies that can reduce emissions of GHGs and particulate matter. It also includes new analyses exploring O₃ and its relationship to public health, mobile sources, under-resourced communities, and GHGs and climate change. Further, the 2022 RAQS identifies strategies to expand SDAPCD regional partnerships, identify more opportunities to engage the public and communities of concern, and integrate environmental justice and equity across all proposed measures and strategies.

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 (Senate Bill 656 required additional controls to reduce ambient concentrations of PM₁₀ 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 the project.

SDAPCD Regulation II: Permits; Rule 10: Permits Required

This rule requires any person building, erecting, altering or replacing any article, machine, equipment or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminant, to first obtain written authorization for such construction from the Air Pollution Control Officer (SDAPCD 1996a).

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

This rule applies to any new or modified stationary source, to any new or modified emission unit, to any replacement emission unit, and to any relocated emission unit being moved to a stationary source provided that, after completion of the project, the stationary source is not a major stationary source or a federal major stationary source (SDAPCD 2020b).

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 U.S. 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).

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 1976).

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 2009).

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 2022b). Construction and operation of the proposed 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 proposed 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 IV: Prohibitions; Rule 67.7: Cutback and Emulsified Asphalts

This rule prohibits manufacturers, distributors, and end users of cutback and emulsified asphalt materials for the paving, construction or maintenance of parking lots, driveways, streets and highways from applying asphalt material or road oils which contain more than 0.5 percent by volume VOC which evaporate at 260° C (500 ° F) or less (SDAPCD 1996b).

SDAPCD Regulation IV: Prohibitions; Rule 69.4.1: Stationary Reciprocating Internal Combustion Engines.

This rule applies to stationary internal combustion engines with a brake horsepower (bhp) rating of 50 or greater (SDAPCD 2020c).

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 the 2021 Regional Plan for the San Diego region (SANDAG 2021). The 2021 Regional Plan offers a vision for a transportation system that does not rely on any single mode of transportation but instead offers a complete and integrated system to ensure that all San Diego County residents have access to safe transportation choices that protect the environment and support the regional economy (SANDAG 2021).

The 2021 Regional Plan includes a Sustainable Communities Strategy, which describes coordinated transportation and land use planning that exceeds the state's target for reducing per-capita GHG emissions set by CARB. The state-mandated target is a 19% reduction—compared to 2005—in per-

capita GHG emissions from cars and light-duty trucks by 2035. By comparison, the 2021 Regional Plan achieves a 20% reduction by then.

City of San Diego Municipal Code

The SDMC addresses air quality and odor impacts in Chapter 14, Article 2, Division 7, Off-Site Development Impact Regulations 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 (City of San Diego 2010).

City of San Diego General Plan

The City's General Plan was adopted in March 2008 and amended in 2024. The General Plan includes various goals and policies in its Conservation Element related to directly and indirectly improving air quality (City of San Diego 2024b). Applicable policies include the following:

- CE-F.2.** Continue to upgrade energy conservation in City buildings and support community outreach efforts to achieve similar goals in the community.
- 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.
- CE-F.5.** Promote technological innovations to help reduce automobile, truck, and other motorized equipment emissions.
- CE-F.6.** Encourage and provide incentives for the use of alternatives to single-occupancy vehicle use, including using public transit, carpooling, vanpooling, teleworking, bicycling, and walking. Continue to implement programs to provide City employees with incentives for the use of alternatives to single-occupancy vehicles.
- CE-F.9.** Prohibit the idling of motive equipment (vehicles and equipment using fossil fuels) that is owned or leased by the City, and operated by City employees unless mission is necessary.

City of San Diego Zero Emissions Municipal Buildings & Operations Policy

In December 2024, the San Diego City Council adopted an update to Council Policy No. 900-03, the Zero Emissions Municipal Buildings & Operations Policy (ZEMBOP), which establishes an implementing framework to ensure the City leads by example in decarbonizing the municipal

building sector and transitioning to a zero-emissions fleet by 2035. ZEMBOP applies to all municipal facilities and parking lots and is included in all new leases of City-owned property.

With the adoption of ZEMBOP, new construction projects will be required to be all-electric, 10% more efficient than the state code, and designed to include a solar or other renewable energy system plus a battery energy storage system large enough to cover the facility's electricity load. All new construction projects shall be designed and operated with exclusively electric systems or appliances for space conditioning, water heating, cooking, and lighting, and without using any fossil fuel energy source for non-emergency electricity generation or any other non-emergency functions. All fleet parking spaces in associated parking lots must be EV Ready (i.e. wiring to the spaces), and staff and public spaces must meet CALGreen Tier 1 requirements for EV charging infrastructure.

5.3.3 IMPACTS ANALYSIS

5.3.3.1 Issue 1: Air Quality Plans

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

Threshold

To determine the significance of the proposed 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:

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

Impact

As stated in Section 5.3.2, the SDAPCD and SANDAG are responsible for developing and implementing the clean air plans for attainment and maintenance of the NAAQS and CAAQS in the SDAB—specifically, the SIP and RAQS.² The federal O₃ maintenance plan, which is part of the SIP, was last adopted in 2020. The SIP includes a demonstration that current strategies and tactics would maintain acceptable air quality in the SDAB based on the NAAQS. The RAQS was initially adopted in 1991 and is updated every 3 years (most recently in 2022). The RAQS outlines SDAPCD's plans and control measures designed to attain the CAAQS for O₃. 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 San Diego County and the cities in the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory

² For the purpose of this discussion, the relevant federal air quality plan is the O₃ maintenance plan (SDAPCD 2020a). The RAQS is the applicable plan for purposes of state air quality planning. Both plans reflect growth projections in the SDAB.

controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by San Diego County and the cities in the County as part of the development of their general plans. The 2022 RAQS continues to build upon previous progress to reduce ground-level ozone, but also complements regional actions addressing GHG and climate change.

If a project involves 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 and may contribute to a potentially significant cumulative impact on air quality.

The project site is designated Industrial Employment in the City's General Plan and zoned Open Space, Residential-Single Unit in the City's Zoning Code (City of San Diego 2024a). The M CCP which includes the project site designates the site for Industrial. The site is undeveloped, serving as natural open space dominated by native and non-native vegetation. The project would develop a public service facility, specifically a fire station, which is a use permitted in any land use designation. Therefore, the project would not result in an inconsistency or conflict with the General Plan or Community Plan and would conform to applicable policies and standards of the General Plan and Community Plan. Furthermore, as detailed in Section 5.3.3.2 below, the project would not result in a significant air quality impact with respect to construction- and operational-related emissions of ozone precursors or criteria air pollutants. The project would also comply with all existing and new rules and regulations as they are implemented by the SDAPCD, CARB, and/or EPA related to emissions generated during construction.

SANDAG produces a Regional Growth Forecast, which is important for developing regional plans and strategies mandated by federal and state governments such as the RTP/SCS, the Program Environmental Impact Report for the RTP/SCS, the Air Quality Management Plan, the Federal Transportation Improvement Program, and the Regional Housing Needs Assessment. The most recent RTP/SCS was adopted in December 2021 (2021 Regional Plan) with a planning horizon of 2016 through 2050. Appendix F of the 2021 Regional Plan describes the trends in population, housing, and employment. SANDAG's Series 14 Regional Growth Forecast estimated that the City of San Diego would have a 27.8% increase in jobs from 2016 to 2050, which is an additional 247,848 jobs or approximately 7,289 jobs per year (SANDAG 2021). Implementation of the project would result in an increase of approximately 12 jobs during operation. Thus, project site employees would represent approximately 0.001% of the total jobs, and the growth from the project would be within SANDAG's growth projections. Therefore, impacts would be less than significant.

Significance of Impact

The project's emissions are not anticipated to result in air quality impacts that were not envisioned in the County or City's growth projections and RAQS, and the minor increase in employment in the region would not obstruct or impede implementation of local air quality plans. Based on the analysis

above, implementation of the project would not result in development in excess of that anticipated in local plans or increases in growth beyond those contemplated by SANDAG. As such, the minimal increase in vehicle trips associated with development of a fire station are considered to be anticipated in the SIP and RAQS. Because the proposed land use, associated vehicle trips, and employment growth are anticipated in local air quality plans, the project would be consistent at a regional level with the underlying growth forecasts in the RAQS. Impacts would be **less than significant**.

Mitigation

No mitigation would be required.

5.3.3.2 Issues 2 and 3: Cumulatively Considerable Net Increase of Criteria Pollutants and Particulate Matter

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 proposed 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.
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including release emissions which exceed quantitative thresholds for ozone precursors).

The thresholds listed in Table 5.3-3 represent screening-level thresholds that can be used to evaluate whether project-related emissions could cause a significant impact on air quality. Emissions below the screening-level thresholds would not cause a significant impact. The SDAPCD Air Quality Significance Thresholds shown in Table 5.3-3 were used to determine significance of project-generated construction and operational criteria air pollutants; specifically, the project's potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation. For nonattainment pollutants, if emissions exceed the thresholds shown in Table 5.3-3, the proposed project could have the potential to result in a cumulatively considerable net increase in these pollutants and, thus, could have a significant impact on the ambient air quality.

**Table 5.3-3.
San Diego Air Pollution Control District Air Quality
Significance Thresholds**

Pollutant	Emission Rate		
	<i>Pounds per Hour</i>	<i>Pounds per Day</i>	<i>Tons per Year</i>
PM ₁₀	—	100	15
PM _{2.5} ^a	—	67	10
NO _x	25	250	40
SO _x	25	250	40
CO	100	550	100
Lead and Lead Compounds	—	3.2	0.6
VOCs	—	137 ^b	15

Sources: City of San Diego 2022; SDAPCD 2020b.

Notes: — = not available.

- ^a PM_{2.5} thresholds consistent with SDAPCD AQIA Trigger levels (Regulation II, Rule 20.2, Table 20.2-1).
^b VOC threshold based on the threshold of significance for VOCs from the South Coast Air Quality Management District and the Monterey Bay APCD as stated in the City of San Diego's Guidelines for Determining Significance.

The SDAPCD document Supplemental Guidelines for Submission of Air Toxics “Hot Spots” Program Health Risk Assessments provides guidance with which to perform HRAs within the SDAB. The current SDAPCD thresholds of significance for TAC emissions from the operations of both permitted and non-permitted sources are combined and are less than 10 in 1 million for cancer and less than 1.0 for the chronic hazard index (SDAPCD 2022a).

Impact

Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SDAPCD 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. A cumulative analysis regarding air quality is provided in Chapter 6, Cumulative Impacts, and below.

Construction Emissions

Construction of the proposed project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (vendor and haul truck trips, and 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 the California Emissions Estimator Model (CalEEMod). Default values provided by the program were used where detailed project information was not available. A detailed depiction of the construction schedule—including information regarding phasing, equipment used during each phase, haul trucks, vendor trucks, and worker vehicles—is included in Appendix C.

Development of the proposed project would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, and asphalt pavement application. As described previously, fugitive dust would be limited through compliance with SDAPCD Rule 55, which requires the restriction of visible emissions of fugitive dust beyond the property line. The project would also be subject to the Whitebook, Section 3-12.2.1 Dust Abatement and Section 5-1.1 Environmental and Safety Laws, which would require the construction contractor to have dust abatement measures and knowledge of applicable environmental laws protecting air quality.

Table 5.3-4 shows the estimated maximum daily construction emissions associated with the conceptual construction years of the project. Emissions represent the maximum of summer and winter. “Summer” emissions are representative of the conditions that may occur during the O₃ season (May 1 to October 31), and “winter” emissions are representative of the conditions that may occur during the balance of the year (November 1 to April 30). Complete details of the emissions calculations are provided in the Air Quality and Greenhouse Gas Emissions Calculations (Appendix A of Appendix C).

Table 5.3-4. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	Pounds per Day					
Summer						
2026	0.46	4.00	5.90	0.01	0.82	0.26
2027	1.05	9.55	10.39	0.02	5.99	3.01
2028	0.56	4.55	8.15	0.01	0.44	0.21
2029	10.69	4.34	8.07	0.01	0.43	0.20
Winter						
2026	1.08	10.11	10.49	0.02	6.02	3.03
2027	1.04	9.59	10.33	0.02	5.99	3.01
2028	0.57	4.57	8.01	0.01	0.44	0.21
2029	0.55	4.36	7.93	0.01	0.43	0.20
Maximum	10.69	10.11	10.49	0.02	6.02	3.03
Threshold	137	250	550	250	100	67
Threshold exceeded?	No	No	No	No	No	No

Source: See Appendix C for complete results.

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter.

As shown in Table 5.3-4, daily construction emissions for the project would not exceed the SDAPCD significance thresholds for criteria air pollutants. Complete details of the emissions calculations are provided in Appendix C. The project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Furthermore, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard, nor would the project exceed 100 pounds per day of PM. Therefore, the project would have a less-than-significant impact related to criteria air pollutant emissions during construction and would not require mitigation.

Operational Emissions

Operation of the project would generate VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} emissions from mobile sources (vehicle trips), area sources, and stationary sources. As discussed in Section 5.3.2 and Appendix C, the ZEMBOP requires new construction projects to be all-electric; therefore, the project shall be designed and operated with exclusively electric systems or appliances for space conditioning, water heating, cooking, and lighting, and would not generate emissions from energy sources. As discussed in Appendix C, pollutant emissions associated with long-term operations were quantified using CalEEMod, and mobile source emissions were quantified using EMFAC2021.

Table 5.3-5 presents the unmitigated maximum daily emissions associated with the operation of the project in 2029 after all phases of construction have been completed. Complete details of the emissions calculations are provided in Appendix C. Emissions represent maximum of summer and winter. “Summer” emissions are representative of the conditions that may occur during the O₃ season (May 1 to October 31), and “winter” emissions are representative of the conditions that may occur during the balance of the year (November 1 to April 30).

Table 5.3-5. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Source	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	Pounds per Day					
Summer						
Area	0.68	0.01	1.05	<0.01	<0.01	<0.01
Energy	0	0	0	0	0	0
Mobile	0.13	2.57	2.14	0.02	1.83	0.47
Stationary	0.53	1.47	1.34	<0.01	0.08	0.08
Total	1.34	4.05	4.53	0.02	1.91	0.55
Winter						

Table 5.3-5. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Source	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	<i>Pounds per Day</i>					
Area	0.51	N/A	N/A	N/A	N/A	N/A
Energy	0	0	0	0	0	0
Mobile	0.12	2.72	2.07	0.02	1.83	0.48
Stationary	0.53	1.47	1.34	<0.01	0.08	0.08
Total	1.16	4.19	3.41	0.02	1.91	0.56
<i>Maximum Daily Emissions</i>						
Maximum	1.34	4.19	4.53	0.02	1.91	0.56
<i>Threshold</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
Threshold exceeded?	No	No	No	No	No	No

Source: See Appendix C for complete results.

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; <0.01 = reported value is less than 0.01; N/A = not applicable.

Stationary source VOC emissions include diesel fuel tank emissions in pounds per day.

The values shown are the maximum summer or winter daily emissions results from CalEEMod.

Columns may not add due to rounding.

As shown in Table 5.3-5, daily operational emissions for the project would not exceed the SDAPCD significance thresholds for any criteria air pollutant. The project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, the project would result in a less-than-significant impact related to emissions of criteria air pollutant emissions during operation.

Cumulative Analysis

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 per the City's threshold. 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 components, in combination with the emissions from other proposed or reasonably foreseeable future projects, are in excess of established thresholds. However, the project would only be considered to have a significant cumulative impact if its 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).

Additionally, for the SDAB, the RAQS serves as the long-term regional air quality planning document for the purpose of assessing cumulative operational emissions within 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 on which the RAQS is based would have the potential to result in cumulative impacts if they represent development beyond regional projections.

The SDAB has been designated as a federal nonattainment area for O₃ and a state nonattainment area for O₃, PM₁₀, and PM_{2.5}. PM₁₀ and PM_{2.5} emissions associated with construction generally result in localized impacts. The nonattainment status is the result of cumulative emissions from all sources of these air pollutants and their precursors within the SDAB. As shown in Table 5.3-4, the emissions of all criteria pollutants from the project's construction would be below the significance thresholds. Construction would be short term and temporary in nature. Once construction is completed, construction-related emissions would cease. As shown in Table 5.3-5, operational emissions generated by the project would not result in emissions that exceed significance thresholds for any criteria air pollutant. As such, the project would result in a less-than-significant impact to air quality.

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 City and by the County as part of the development of their general plans. Therefore, projects involving 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 discussed in Section 5.3.4.1, the project is consistent with the SANDAG growth projections. Thus, it would be consistent at a regional level with the underlying growth forecasts in the SIP and RAQS.

As a result, the project would not result in a cumulatively considerable contribution to regional O₃ concentrations or other criteria pollutant emissions. Cumulative impacts for construction and operation would be less than significant for the project.

Health Impacts of Other Criteria Air Pollutants

The following discussion is provided to connect the project's potential air quality impacts to potential health consequences. The potential health effects associated with project-generated criteria air pollutant emissions is included as additional information under Issues 2 and 3 and does not require a separate significance conclusion.

Construction and operation of the project would generate criteria air pollutant emissions; however, estimated construction and operational emissions would not exceed the SDAPCD mass-emission

daily thresholds. As previously discussed, the SDAB has been designated as a federal nonattainment area for O₃ and a state nonattainment area for O₃, PM₁₀, and PM_{2.5}.

Health effects associated with O₃ include respiratory symptoms, worsening of lung disease leading to premature death, and damage to lung tissue (CARB 2024a). VOCs and NO_x are precursors to O₃, for which the SDAB is designated as nonattainment with respect to the NAAQS and CAAQS. The contribution of VOCs and NO_x to regional ambient O₃ concentrations is the result of complex photochemistry. The increases in O₃ concentrations in the SCAB due to O₃ 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 O₃ concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O₃ ambient air quality standards tend to occur between April and October when solar radiation is highest. Because O₃ is a regional pollutant, the overall impact of a single project's emissions of O₃ precursors is expected to fall within the noise or margin of error of photochemical grid models. These models are designed to simulate O₃ concentrations resulting from substantial pollutant loads distributed across broad geographic areas. Nonetheless, because construction and operation of the project would not result in O₃ precursor emissions (i.e., VOCs or NO_x) that would exceed the SDAPCD thresholds, the project is not anticipated to substantially contribute to regional O₃ concentrations and their associated health impacts.

Health effects associated with NO_x include lung irritation and enhanced allergic responses (CARB 2024b). Construction and operation of the project would not generate NO_x emissions that would exceed the SDAPCD mass daily thresholds; therefore, the project is not anticipated to contribute to exceedances of the NAAQS and CAAQS for NO₂ or contribute to associated health effects. In addition, the SDAB is designated as in attainment of the NAAQS and CAAQS for NO₂, and the existing NO₂ concentrations in the area are well below the NAAQS and CAAQS standards.

Health effects associated with CO include chest pain in patients with heart disease, headache, light-headedness, and reduced mental alertness (CARB 2024b). CO tends to be a localized impact associated with congested intersections. CO hotspots will be discussed in Section 5.3.4.2 under Issue 4 as a less-than-significant impact. Thus, the project's CO emissions would not contribute to the health effects associated with this pollutant.

Health effects associated with PM₁₀ and PM_{2.5} include premature death and hospitalization, primarily for worsening of respiratory disease (CARB 2024b). As with O₃ and NO_x, the project would not generate emissions of PM₁₀ or PM_{2.5} that would exceed the SDAPCD thresholds. Accordingly, the project's PM₁₀ and PM_{2.5} emissions are not expected to cause an increase in related health effects for this pollutant.

In summary, the project would not result in any potentially significant contribution to local or regional concentrations of nonattainment pollutants and would not result in a significant contribution to the adverse health impacts associated with those pollutants.

Significance of Impact

The project region is in non-attainment of state and federal standards for O₃, PM₁₀, and PM_{2.5}. The project's maximum daily construction and operation emissions would not exceed the applicable significance thresholds or the City's threshold of 100 pounds per day of PM₁₀. Thus, the project would result in a less-than-significant net increase of O₃, PM₁₀, and PM_{2.5}. Impacts related to contributions towards regional non-attainment of air quality standards would be **less than significant**.

Mitigation

No mitigation would be required.

5.3.3.3 Issue 4: Sensitive Receptors

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

Thresholds

To determine the significance of the proposed 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 concentration including air toxics such as diesel particulates...As adopted by the South Coast Air Quality Management District (SCAQMD) in their CEQA Air Quality Handbook (Chapter 4), a sensitive receptor is a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant than is the population at large. Sensitive receptors (and the facilities that house them) in proximity to localized CO sources, toxic air contaminants or odors are of particular concern. Examples include long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playground, childcare centers, and athletic facilities.

Impact

Carbon Monoxide Hotspots

Mobile source impacts occur on two scales – regionally and locally. Regionally, project-related travel would add to trip generation and increased the vehicle miles traveled within the local airshed and

the SDAB. Locally, traffic from the project would be added to the City's roadway system. If such traffic occurs during periods of poor atmospheric ventilation, is composed of a large number of vehicles cold-started and operating at pollution-inefficient speeds and is operating on roadways already crowded with non-proposed project traffic, 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 vehicular 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.

During construction, the project would result in CO emissions from construction worker vehicles, haul trucks, and off-road equipment. Title 40, Section 93.123(c)(5) of the California Code of Regulations (CCR), Procedures for Determining Localized CO, PM₁₀, and PM_{2.5} Concentrations (hot-spot analysis), states that "CO, PM₁₀, and PM_{2.5} hot-spot analyses are not required to consider construction-related activities, which cause temporary increases in emissions. Temporary increases are defined as those which occur only during the construction phase and last five years or less at any individual site" (40 CCR 93.123). Since construction activities would be temporary, a project-level construction hotspot analysis would not be required.

The City's CO hotspots screening guidance was followed to determine whether the project would require a site-specific hotspot analysis (City of San Diego 2022).

- If a proposed development causes a six-lane road to deteriorate to Level of Service (LOS) E or worse, the resulting longer queuing at the traffic signals could cause a localized significant air quality impact. A site-specific CO hotspot analysis should be performed to determine if health standards are potentially violated and to identify any affected sensitive receptor.
- If a proposed development causes a six-lane road to drop to LOS F, the resultant extended wait at the signalized intersections could cause a significant air quality impact. A site-specific CO hotspot screening and/or analysis should be performed to determine if health standards are potentially violated and to identify any affected sensitive receptor.
- If a proposed development causes a four-lane road to drop to LOS E or worse, the extended wait at the signalized intersection could cause a significant air quality impact. A site-specific CO hotspot screening and/or analysis should be performed to determine if health standards are potentially violated and to identify any affected sensitive receptor.
- If a proposed development is within 400 feet of a sensitive receptor and the LOS is worse than D, a site-specific CO hotspot analysis should be performed to determine if health standards are potentially exceeded and to determine the level of adverse effect on the receptors.

According to the Transportation Technical Memorandum (Appendix B), the project would generate approximately 28 employee trips per day and 50 truck trips per day for a total of 78 trips per day.

Based on the estimate of project trips, the project would not require a Local Mobility Analysis or a LOS Screening Analysis. Therefore, it is expected that the project would not meet or exceed the City's hotspots screening criteria above, and a CO hotspot is not expected to occur. As such, potential project-generated impacts associated with CO hotspots would be less than significant.

Toxic Air Contaminants

Construction Health Risk

In addition to impacts from criteria pollutants, project impacts may include emissions of pollutants identified by the state and federal government as TACs or HAPs. The greatest potential for TAC emissions during construction would be DPM emissions from heavy equipment operations and heavy-duty trucks, and the associated health impacts to sensitive receptors. Construction of the project would occur over a period of 34 months and following completion of construction activities, project-related TAC emissions would cease. The closest sensitive receptors to the project site are single-family residences located approximately 70 feet to the east of the project site. As such, a construction HRA was performed for the project as discussed below.

Based on results from the HRA, the maximally exposed individual resident off site would be located at the single-family residences to the east of the project site. Table 5.3-6 summarizes the results of the HRA for project construction, and detailed results are provided in Appendix B, Health Risk Assessment Output Files to Appendix C.

Table 5.3-6.
Construction Activity Health Risk Assessment Results Prior to Mitigation

Impact Parameter	Units	Project Impact	CEQA Threshold	Significance of Impact
Cancer Risk	Per Million	57.9	10.0	Potentially Significant
Chronic Health Index	Not Applicable	0.03	1.0	Less than Significant

Source: Appendix B to Appendix C.

The results of the HRA demonstrate that the TAC exposure from construction diesel exhaust emissions would result in cancer risk above the 10 in 1 million threshold and Chronic Hazard Index less than 1. Therefore, TAC emissions from construction of the project would result in a potentially significant impact, and mitigation is required.

Operational Health Risk

Table 5.3-7 summarizes the results of the HRA for project operation, and detailed results are provided in Appendix B to Appendix C, Health Risk Assessment Output Files.

Table 5.3-7.
Operational Activity Health Risk Assessment Results Prior to Mitigation

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Cancer Risk	Persons Per Million	6.2	10.0	Less than Significant
Chronic Hazard Index	Not Applicable	0.002	1.0	Less than Significant
Acute Impact	Not Applicable	0.0001	1.0	Less than Significant

Source: Appendix B to Appendix C.

As shown in Table 5.3-7, TAC exposure from operational diesel exhaust emissions would result in cancer risk below the 10 in 1 million threshold, the chronic impact would be less than 1, and the acute impact would be less than 1. Therefore, the project would result in a less-than-significant impact related to exposure to TAC emissions during operation.

Significance of Impact

Health Impacts of Carbon Monoxide

Based on the estimate of project trips, the project would not require a Local Mobility Analysis or a LOS Screening Analysis. Therefore, it is expected that the project would not meet or exceed the City's screening criteria above. Therefore, a CO hotspot is not expected to occur. This would be a **less-than-significant impact**.

Construction Health Risk

The results of the HRA demonstrate that the TAC exposure from construction diesel exhaust emissions would result in cancer risk of 57.9 in 1 million, which would exceed the 10 in 1 million threshold. Therefore, TAC emissions from construction of the proposed project would expose sensitive receptors to substantial pollutant concentrations and would result in a **potentially significant impact** (Issue 4).

Operational Health Risk

The results of the HRA demonstrate that the TAC exposure from operational diesel exhaust emissions would result in cancer risk of 6.2 in 1 million, which would not exceed the 10 in 1 million threshold. The chronic and acute impacts would also not exceed the respective thresholds. Therefore, TAC emissions from construction of the proposed project would not expose sensitive receptors to substantial pollutant concentrations and the impact is **less than significant**.

Mitigation

The following mitigation is proposed to reduce Impact Issue 4 related to construction health risk by requiring CARB-certified Tier 4 engines greater than 50-horsepower.

MM-AQ-1 Require Use of Tier 4 Final Off-Road Equipment During Construction. Prior to the commencement of construction activities, the City shall require its construction contractor to demonstrate that all 50-horsepower or greater diesel-powered equipment is powered with California Air Resources Board (CARB)-certified Tier 4 Final or better engines.

In the event of changed circumstances (e.g., changes in the availability of specific types of construction equipment), the construction contractor may submit a request to the City of San Diego Environmental Designee (ED) to apply an equivalent method of achieving project-generated construction emissions that fall below the numeric cancer risk standards established by the San Diego Air Pollution Control District (SDAPCD). Documentation using industry-standard emission estimation methodologies shall be furnished to the City of San Diego ED demonstrating that estimated project-generated construction emissions would not exceed the applicable SDAPCD cancer risk threshold with the alternate construction method(s). If the documentation demonstrates that project-generated construction emissions will remain below the applicable SDAPCD cancer risk threshold, then the City of San Diego ED may approve the alternate construction method(s), at the Director's discretion. Required construction equipment fleet and methodologies approved by the City shall be included in the contract specifications for the construction contractor.

Significance of Impact After Mitigation

MM-AQ-1 would be implemented to reduce construction-generated exhaust PM₁₀ (DPM) emissions. Potential health risk at the maximally exposed individual resident resulting from proposed construction activities with incorporation of **MM-AQ-1** is shown in Table 5.3-8.

Table 5.3-8
Construction Activity Health Risk Assessment Results After Mitigation

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Cancer Risk	Per Million	6.9	10.0	Less than Significant

Chronic Hazard Index	Not Applicable	0.004	1.0	Less than Significant
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Source: Appendix B of Appendix C.

As shown in Table 5.3-8, after mitigation, TAC exposure from construction diesel exhaust emissions would result in cancer risk below the 10 in 1 million threshold and the Chronic Hazard Index would be less than 1. Therefore, after implementation of mitigation, the project would result in a **less-than-significant** impact related to exposure to TAC emissions during construction.

5.3.3.5 Issue 5: Odors

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

Thresholds

To determine the significance of the proposed 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 compound(s) that would result from the project's proposed use(s), the types of neighboring uses potentially affected, the distance(s) between the project's point source(s) and the neighboring uses such as sensitive receptors, and the resultant concentration(s) at the receptors.

Impact

Section 41700 of the California Health and Safety Code and SDAPCD Rule 51 (Public Nuisance) prohibits 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 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 depends on numerous factors: the nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute 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 generated from vehicles and/or equipment exhaust emissions during construction of the project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and asphalt pavement application. Such odors are temporary and for the types of construction activities anticipated for the project, would generally be short-term and occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be considered less than significant.

Operation

Due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, there are no quantitative or formulaic methodologies to determine if potential odors would have a significant impact. Examples of land uses and industrial operations that are commonly associated with odor complaints include agricultural uses, wastewater treatment plants, food processing facilities, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding facilities. Odors would be generated from vehicles idling, entering, or leaving the fire station, such as fire trucks and ambulances, and/or maintenance and testing of the emergency generator. However, such odors would occur at magnitudes that would be negligible and not affect substantial numbers of people. Furthermore, the project is not expected to produce any nuisance odors; therefore, impacts related to odors caused by the project during operations would be less than significant.

Significance of Impact

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

Mitigation

No mitigation would be required.

5.3.3.6 Issue 6: Alteration of Air Movement

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

Thresholds

To determine the significance of the proposed 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:

- Result in a substantial alteration of air movement in the area of the project site.
- Release substantial quantities of air contaminants beyond the boundaries of the premises upon which the stationary source emitting the contaminants is located.

Impact

This issue is usually associated with placement of tall structures in close 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 fire station would be placed within a suburban area that is primarily characterized by open space and undeveloped land with nearby low-scale suburban development. Surrounding land uses include residential development to the north and east, commercial to the south, and open space to the west. The proposed height of the fire station would be a maximum of 64 feet above grade. There are no buildings close enough to the project site that could result in a situation where the proposed fire station could contribute to a substantial alteration of air movement. The project would be at different elevations than nearby residential and commercial development with intervening roads and topography that would not generate air flow patterns that would travel through to off-site developed areas creating a 'tunneling' wind effect. Although localized effects would vary from the existing condition, the substantial alteration of air movement would not occur.

SDMC, Chapter 14, Article 2, Division 7, Off-Site Development Impact Regulations paragraph 142.0710, Air Contaminant Regulations, 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." As discussed above under Issue 2 and Issue 3, the project's stationary source criteria air pollutant emissions would be below the City's thresholds of significance. As discussed above under Issue 4, the results of the operational HRA demonstrate

that the TAC exposure from the stationary sources, including the emergency generator and diesel fuel tank, would be below the applicable thresholds for cancer risk, Chronic Hazard Index, and acute impact. As discussed above under Issue 5, the project would not create objectionable odors affecting a substantial number of people. Therefore, the project would not represent a release of substantial quantities of air contaminants beyond the project boundaries.

Significance of Impact

Impacts relating to substantial alternations of air movement and substantial quantities of air contaminants would be **less than significant**.

Mitigation

No mitigation would be required.

5.4 BIOLOGICAL RESOURCES

This section describes the existing biological resources conditions of the Fairmount Avenue Fire Station Project (project) site; identifies associated regulatory requirements; evaluates potential impacts; and identifies mitigation measures, as applicable, related to implementation of the project.

The following discussion is based on the Biological Resources Technical Report prepared by Dudek (January 2025) and included as Appendix D.

5.4.1 EXISTING CONDITIONS

Physical Conditions

The project site is currently vacant and is primarily characterized by undeveloped land which slopes down to a flat basin bottom from the north, east, and south, with steep hillsides identified on the east side of the study area that intersect the project impact footprint. The elevation within the project site ranges from 140 feet amsl in the northwest to 194 feet amsl in the southeast (Appendix F.2). Over 40% of the site has a slope gradient that exceeds 25%. Portions of the project study area, which includes the project site and a surrounding 500-foot buffer area, are located within and adjacent to the City's MHPA. The location of the proposed fire station is bounded to the east by 47th Street and on the north, south and west by open space connected to Chollas Creek canyon.

The topography is generally flat at the off-site construction staging. Lands to the north, east, and south slope upwards; lands north and west of the off-site study area are flatter, but also eventually slope upwards towards the edge of the off-site construction staging area. Nearby Chollas Creek represents the lowest point and likely collects run-off occurring within this area. The elevation ranges from approximately 112 feet to 186 feet amsl. Portions of the off-site construction staging area are located within the MHPA (Appendix D).

Watershed and Hydrology

The project site is located within the Chollas Creek Watershed which encompasses approximately 16,270 acres of urbanized land within San Diego County. The watershed is further divided into larger North Fork (9,276 acres) and South Fork (6,997 acres) sub watersheds (San Diego County 2009). The North Fork of Chollas Creek is located approximately 300 feet northwest of the project site. A complete assessment of hydrology and water quality for the project site including a figure showing the boundaries of the watersheds is provided in Section 5.9, Hydrology.

Aquatic Resource Features

Aquatic resources were mapped outside of the project site, within the 500-foot project study area (Figure 5.4-1a and Figure 5.4-1b, Appendix D). Aquatic features are ecologically complex systems and habitats for wildlife and plant species. Table 5.4-3 summarizes the aquatic resources identified within the project and off-site study areas. Aquatic resource features and associated habitat are described in further detail in the Vegetation Communities and Land Cover Types section below. Note that all aquatic resources and their extent within the project site are preliminary until verified by the U.S. Army Corps of Engineers (USACE), the Regional Water Quality Control Board (RWQCB), and/or the California Department of Fish and Wildlife (CDFW).

Project Study Area Vegetation Communities

The proposed 0.59-acre project footprint or area of disturbance is within the larger 1.28-acre project parcel. The project site includes the 0.25-acre fire station building footprint and 0.34-acre of associated Zone 1 brush management (impact footprint). The project site was assessed by Dudek biologists in conjunction with a surrounding 500-foot survey buffer area (project study area). In addition, there is 0.68-acre of the project site that is located outside the project parcel, within the 47th Street right-of-way and is considered off-site. The off-site construction staging area (off-site study area) was also reviewed in conjunction with a surrounding 500-foot survey buffer area.

A total of 13 vegetation communities were identified within the project study area: coastal sage scrub (including disturbed variety), coastal sage scrub (*Baccharis*-dominated), coastal sage scrub (*Rhus*-dominated), mixed chaparral, southern willow forest, riparian scrub (mulefat scrub), southern riparian forest, ornamental plantings, eucalyptus woodland, natural flood channel, urban or developed land, and disturbed land (Appendix D). The mapped vegetation communities on the project site are shown on Figure 5.4-1a, On-Site Biological Resources, and their acreages are detailed in Table 5.4-1. The vegetation communities and land cover types recorded in the project study area are described below.

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

Vegetation Community/ Land Cover Type	City of San Diego Biology Guidelines Vegetation Community	City of San Diego MSCP Habitat Tier	Project Parcel Acreage ¹	City Right-of- Way Acreage	500-foot Study Area
<i>Upland Vegetation Communities</i>					
Coastal Sage Scrub	Coastal Sage Scrub	II	0.662	—	3.972
Coastal Sage Scrub (disturbed)	Coastal Sage Scrub	II	0.096	0.031	0.104
Coastal Sage Scrub (Baccharis-dominated)	Coastal Sage Scrub	II	—	—	2.184
Coastal Sage Scrub (Rhus-dominated)	Coastal Sage Scrub	II	—	—	1.019
Mixed Chapparal	Mixed Chapparal	IIIA	0.235	—	0.375
Disturbed Land	Disturbed Land	IV	0.165	0.010	0.998
Ornamental Plantings	Ornamental Plantings	IV	0.031	—	0.636
Eucalyptus Woodland	Eucalyptus Woodland	IV	—	—	0.098
Urban/Developed Land	Disturbed Land	N/A	—	0.015	13.99
<i>Wetlands</i>					
Southern Riparian Forest	Riparian Forest	Wetland	0.058	—	0.042
Southern Willow Forest	Riparian Forest	Wetland	0.036	—	0.419
Natural Flood Channel	Natural Flood Channel	Wetland	—	—	0.256
Mulefat Scrub	Riparian Scrub	Wetland	—	—	0.051
Total			1.283	0.056	25.513

Source: Appendix D.

Note: ¹ The project parcel includes the project site.

Coastal Sage Scrub (including disturbed)

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 California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), and sages (*Salvia* spp.)—with scattered evergreen shrubs, including lemonade sumac (*Rhus integrifolia*) and laurel sumac (*Malosma laurina*) (Appendix D). Coastal sage scrub is the dominant vegetation community, including the disturbed variety, which makes up a large portion of the habitat on the northern facing slope of the canyon within and adjacent to the project impact footprint and the disturbed variety is found along the edges of residential development at the bottom of the canyon (see Figure 5.4-1a).

Coastal Sage Scrub (Baccharis-dominated)

Coastal sage scrub (*Baccharis*-dominated) is a native vegetation community that typically occurs in nutrient-poor soils and is composed primarily of broom baccharis (*Baccharis sarothroides*) or coyote bush (*Baccharis pilularis*). Other drought-deciduous species may also be sparsely intermixed—such as California sagebrush, California buckwheat, and saw toothed goldenbush (*Hazardia squarrosa*) (Appendix D). Coastal sage scrub (*Baccharis*-dominated) is primarily situated along the flat bottom of the site in the northwestern section of the project study area.

Coastal Sage Scrub (Rhus-dominated)

Coastal sage scrub (*Rhus*-dominated) is a native vegetation community that is a variety of general coastal sage scrub described above. This variety typically occurs in nutrient-poor soils and is composed primarily of lemonadeberry. Other drought-deciduous species may also be sparsely intermixed—such as California sagebrush, California buckwheat, broom baccharis, and laurel sumac. Coastal sage scrub is primarily situated on slopes in the northeast portion of the project study area.

Mixed Chaparral

Mixed chaparral is a native vegetation community supporting dense stands of broad-leaved sclerophyll shrubs, typically deep-rooted and about 5-10 feet (1.5-3 meters) tall. There is typically little to no understory vegetation, but often substantial leaf litter. This community is commonly dominated by chamise (*Adenostoma fasciculatum*), manzanitas (*Arctostaphylos* spp.), and blue-colored lilacs (*Ceanothus* spp.) (Appendix D). Mixed chaparral is located in the central section of the project site study area and slightly overlaps with the northwest boundary of the project impact footprint. This habitat is dominated primarily by felt leaved yerba santa (*Eriodictyon crassifolium*).

Disturbed Land

Disturbed Land includes areas which have been physically disturbed through development, grading, disking and as a result cannot be identified as a native or naturalized vegetation association. However, these areas do have a recognizable soil substrate. The existing vegetation is typically composed of non-native ornamental or exotic species. In the project site study area, this land cover consists of dirt access paths and areas of non-native annual species. Where present, vegetation in this community consists primarily of wild mustard (*Hirshfeldia incana*) and crown daisy (*Glebionis coronaria*) (Appendix D).

Ornamental Planting

Ornamental plantings refers to areas where non-native ornamental species and landscaping schemes have been installed and maintained, usually as part of commercial or residential property. This habitat type supports myriad ornamental species, including, not limited to, hottentot fig (*Carpobrotus edulis*), Peruvian pepper tree (*Schinus molle*), Brazilian pepper tree (*Schinus terebinthifolius*), and red apple iceplant (*Aptenia cordifolia*) (Appendix D). This vegetation community occurs within the project site study area, primarily along the edges of the 47th Street and residential development to the northeast. The dominant species in this vegetation community is Brazilian peppertree (*Schinus terebinthifolius*).

Eucalyptus Woodland

Eucalyptus Woodland includes eucalyptus species (*Eucalyptus globulus*, *E. camaldulensis*, or *E. spp.*) planted as trees, groves, and windbreaks that form thickets with minimal shrubby understory to 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 (Appendix D). Eucalyptus Woodland occurs within the project study area in limited patches along the eastern edge of 47th Street.

Urban/Developed Land

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. This land cover type predominantly consists of residential development and paved streets to the south, east, and north of the project site study area and off-site study area.

Riparian Forest (Southern Willow Forest)

Riparian forest (southern willow forest) is a vegetation community dominated by broad-leaved willow trees, often tall, with a closed, or nearly closed canopy, and may have an understory of shrubby willows. Dominant species are often arroyo willow (*Salix lasiolepis*) and Gooding's willow (*Salix goodingii*). Other species besides willows that might also be found in riparian forest (southern willow forest) communities include Douglas' sagewort (*Artemisia douglasiana*), mulefat (*Baccharis salicifolia*), manroot (*Marah macrocarpus*), California sycamore, Fremont cottonwood (*Populus*

fremontii), and black cottonwood (*Populus trichocarpa*) (Appendix D). The area mapped as southern willow forest occurs northwest of the project site. Within the project site, this vegetation community is dominated by Goodding's willow and arroyo willow.

Riparian Forest (Southern Riparian Forest)

Riparian forest (southern riparian forest) is a vegetation community that is comprised of dense stands of riparian vegetation with a closed or nearly closed canopy, found in areas along rivers, streams, bottomlands, and sub-irrigated or frequently overflowed lands. California sycamore, Fremont cottonwood, and various willows (*Salix spp.*) constitute the dominant species, often in proportional densities. Other species that might also found in southern riparian forest communities include Douglas' sagewort (*Artemisia douglasiana*), mulefat, manroot, and black cottonwood (Appendix D). The area mapped as southern willow forest occurs within the project site, northwest of the project impact footprint area. Within the study area, this vegetation community is dominated by Fremont cottonwood.

Riparian Scrub (Mulefat Scrub)

Riparian scrub (mulefat scrub) is a vegetation community reliant on frequent flooding, dominated by mulefat, with other characteristic species being primarily willows (*Salix spp.*), which may occur sparsely intermixed. The area mapped as mulefat scrub occurs in the northwestern section of the project study area. This vegetation community is dominated by mulefat with some broom baccharis sparsely intermixed.

Natural Flood Channel / Non-Vegetated Channel

Natural flood channel is a wetland habitat type which Oberbauer et al. (2008) describes as "Non-Vegetated Floodplain or Channel." Sandy, gravelly, or rocky bottoms and fringes of waterways/flood channels dominate this habitat. Total vegetation cover is usually less than 10%, since variable water lines inhibit growth and only allow the presence of weedy species and grasses along the outer edges of the wash. The natural flood channel mapped on-site occurs outside of the project site in the far northwest section of the study area. It is a wash-like habitat dominated by sandy substrate.

Off-Site Construction Staging Area Vegetation Communities

A total of 10 vegetation communities were identified within the 0.52-acre off-site construction staging area: coastal sage scrub, coastal sage scrub (*Baccharis*-dominated), ornamental plantings, eucalyptus woodland, non-native grassland: broad-leaf dominated, non-native vegetation, urban/developed land, developed concrete-lined channel, southern cottonwood-willow riparian forest, non-vegetated channel (Appendix D). No vegetation resources are present within the 47th

Street right-of-way; therefore, this discussion focuses on the off-site study area. The mapped vegetation communities within the off-site study area are shown in Figure 5.4-1b, Off-Site Construction Staging Area Biological Resources, and their acreages are detailed in Table 5.4-2.

Table 5.4-2
Vegetation Communities and Land Cover Types
in the Off-site Study Area

Vegetation Community/ Land Cover Type	City of San Diego Biology Guidelines Vegetation Community	City of San Diego MSCP Habitat Tier	Off-site Construction Staging Area Acreage ¹	500-foot Off- site Study Area Acreage
<i>Upland Communities</i>				
Coastal Sage Scrub	Coastal Sage Scrub	II	—	0.911
Coastal Sage Scrub (Baccharis-dominated)	Coastal Sage Scrub	II	0.039	2.736
Non-Native Vegetation	Disturbed Land	IV	0.076	0.137
Ornamental Plantings	Ornamental Plantings	IV	—	1.695
Eucalyptus Woodland	Eucalyptus Woodland	IV	—	4.389
Non-Native Grassland: Broad-leaf dominated	Non-Native Grasslands	III	—	1.908
Urban/Developed Land	Disturbed Land	IV	0.408	17.613
<i>Wetlands</i>				
Developed Concrete-Lined Channel	Disturbed Wetland	Wetland	—	0.284
Southern Cottonwood-Willow Riparian Forest	Riparian Forest	Wetland	—	0.149
Non-Vegetated Channel	Disturbed Wetland	Wetland	—	0.503
Total ¹			0.523	30.324

Source: Appendix D

Note: ¹ Total may not exactly sum due to rounding.

Vegetation communities within the off-site study area are similar to the project site. The project site study area and the off-site construction staging study area both contain the following vegetation communities: coastal sage scrub, coastal sage scrub (Baccharis-dominated), eucalyptus woodland, urban/developed land, and ornamental planting. Vegetation communities found within the off-site study area, but not within the project site study area include non-native vegetation, non-native grassland: broad-leaf dominated, southern cottonwood-willow riparian forest, developed concrete-

lined channel, and non-vegetated channel. The vegetation communities and land cover types recorded in the off-site staging area are described below.

Coastal Sage Scrub

Coastal sage scrub occurs within the northern portion of the 500-foot buffer area on an upland slope dominated by California sagebrush and scattered black sage.

Coastal sage scrub (Baccharis-dominated)

Coastal sage scrub (*Baccharis*-dominated) borders the northeastern and southeastern boundaries of the off-site study area. It is densely dominated by broom baccharis and extends east into the study area buffer along the uplands of Cholla Creek. During field reconnaissance, Dudek biologists noted that the coastal California gnatcatcher (*Polioptila californica californica*) was heard foraging and dispersing within the *Baccharis*-dominated coastal sage scrub in the uplands surrounding Cholla Creek.

Eucalyptus Woodland

Eucalyptus woodland is present to the south and west of the off-site study area boundary and borders public rights-of-way.

Urban/Developed Land

This land cover type predominantly consists of residential development and paved streets to the south, east, and north of the project site study area and off-site study area.

Ornamental Planting

Ornamental plantings are present in the off-site study area buffer to the southeast of the off-site study area and are associated with commercial development. Species observed included Brazilian pepper tree and Bougainvillea.

Non-Native Vegetation

Non-native vegetation is described by Oberbauer et al. (2008) as a type of disturbed or developed area that is characterized by predominantly non-native species introduced and established through human action. Non-native vegetation is present along the northern boundary of the off-site study area and consists of a mat of Hottentot figs on the slope leading down to the developed concrete-lined channel associated with Chollas Creek. Non-native vegetation was not observed within the project site.

Non-Native Grassland: Broad-Leaf Dominated

Broadleaf-dominated non-native grassland is a non-native herbaceous vegetation community dominated by one or several non-native or invasive broadleaf species that account for more than 50% of the total vegetative cover. This community is commonly dominated by mustards and thistles.

Non-native grassland: broadleaf-dominated is present to the north of the off-site study area. It is sloped upland to the sports park and is co-dominated by black mustard (*Brassica nigra*) and Maltese star-thistle (*Centaurea melitensis*).

Developed Concrete-Lined Channel

A developed concrete-lined channel is a wetland habitat type which Oberbauer et al. (2008) describes as “Disturbed Wetland”. These areas have been significantly modified by human activity and area either permanently or periodically inundated with water. The City’s Biology Guidelines (City of San Diego 2018) classify concrete-lined channel as a (disturbed) wetland habitat; therefore, potential impacts to this community would be considered significant.

Developed concrete-lined channel occurs immediately north of the off-site study area and is associated with Chollas Creek.

Non-Vegetated Channel

Chollas Creek is mapped as a non-vegetated channel that is present to the north of the off-site study area. It is an ephemeral channel with sandy and cobbly substrate.

Riparian Forest (Southern Cottonwood-Willow)

Southern cottonwood-willow riparian forest is a vegetation community that is comprised of tall, open, broadleafed winter-deciduous trees including cottonwoods and willows, with shrubby willow understories. Characteristic species include mulefat, western sycamore (*Platanus racemosa*), Fremont’s cottonwood (*Populus fremontii*), and black willow (*Salix gooddingii*).

Southern cottonwood-willow riparian forest is present to the north of the off-site study area and is associated with Chollas Creek. It supports willow thickets in the shrub understory with a relatively open canopy of characteristic tree species consisting of Fremont’s cottonwood, western sycamore, and black willow (Appendix D). The City’s Biology Guidelines (City of San Diego 2018) classify

southern cottonwood-willow riparian forest as a wetland habitat; therefore, potential impacts to this community would be considered significant.

This vegetation community is small in extent, relatively narrow, and is connected to a concrete-lined channel that is situated between a sports park and a parking lot in an urbanized area. As such, although this is considered suitable foraging and nesting habitat for the special-status least Bell's vireo (*Vireo bellii pusillus*), it is unlikely to occur within the southern cottonwood-willow riparian forest associated with the portion of Chollas Creek in the off-site study area (Figure 5.4-1b).

Floral Diversity

Based on the results of biological surveys conducted in 2018, 2019, and 2023, a total of 71 species of vascular plants, 41 native (58%) and 30 non-native (42%), were recorded during the biological surveys for the project. A cumulative list of all common and sensitive plant species observed in the study area are provided in Appendix D (attached as Appendix A to Appendix D).

Special-Status Plants

Plant species are considered sensitive 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 MSCP-covered species; and/or have been adopted by the City as narrow endemic.

One sensitive plant species, the San Diego County viguiera (*Bahiopsis laciniata*), was directly observed within the project study area during field reconnaissance and rare plant surveys in 2019. Sensitive plant species directly observed during surveys or known to occur in the surrounding region are further described in Appendix D.

San Diego County viguiera is a California native perennial shrub that is not covered under MSCP, has a CRPR 4.2 rank, and occurs in San Diego and Orange counties (Calflora 2024). This species is found in chaparral and coastal sage scrub habitats at elevations of 195 to 2,460 feet AMSL. San Diego County viguiera blooms from February to August. Seven patches of San Diego County viguiera plants were observed in the project site study area in coastal sage scrub (Figure 5.4-1a). Each patch includes several individuals; an exact count was not recorded.

Wildlife Diversity

The project site supports habitat for upland species within coastal sage scrub, mixed chaparral, and eucalyptus woodland, as described above. These habitats also provide foraging and nesting habitat for migratory and resident bird species and other wildlife species. Some suitable habitat for

sensitive riparian species is present within riparian scrub (mulefat scrub) and riparian forest (southern willow forest and southern riparian forest); however, it is limited to a narrow area following the drainage that runs east to west just north of the project impact footprint.

The off-site construction staging study area also supports a mix of native and non—native vegetation communities that can provide foraging and nesting habitat for birds and other wildlife species. Chollas Creek is within the off-site study area buffer and supports native riparian woodland (southern arroyo willow-cottonwood) that contains mulefat scrub and *Baccharis*-dominated Diegan coastal sage scrub surrounding the natural flood channel, which can provide habitat for wildlife.

A total of 35 wildlife species were recorded during the biological reconnaissance and focused surveys for the project. Of the total 35 wildlife species observed during field surveys, two are considered special-status (see Appendix D). A cumulative list of all common and sensitive wildlife species observed in the study areas during field surveys is provided in Appendix B of Appendix D.

Special-Status Wildlife

Sensitive wildlife species are those listed as federal/state endangered or threatened, those proposed for listing, those fully protected by CDFW, those on the California Watch List, California Species of Special Concern (SSC), or MSCP Covered Species.

Special-status wildlife species determined to have moderate to high potential to occur within the project study areas include orange-throated whiptail (*Aspidoscelis hyperythra*), San Diegan tiger-whiptail (*Aspidoscelis tigris stejnegeri*), red-diamondback rattlesnake (*Crotalus ruber*), two-striped garter snake (*Thamnophis hammondi*), Cooper's hawk (*Accipiter cooperii*), Allen's hummingbird (*Selasphorus sasin*), California thrasher (*Toxostoma redivivum*), wrentit (*Chamaea fasciata*), coastal California gnatcatcher, Dulzura pocket mouse (*Chaetodipus californicus femoralis*), northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), San Diego desert woodrat (*Neotoma lepida intermedia*), Yuma myotis (*Myotis yumanensis*), monarch (*Danaus plexippus*), and Crotch's bumble bee (*Bombus crotchii*) (Appendix D). Descriptions of special-status species with high potential to occur and observed on site are provided below. Other species, including those that are not expected, or with low or moderate potential to occur, such as southwestern willow flycatcher (*Empidonax traillii extimus*), are described in further detail in Appendix D.

Protocol level coastal California gnatcatcher and least Bell's vireo surveys were conducted in 2018 after historic occurrences on and near the project site deemed potential for these species to occur.

Least Bell's vireo was not observed during protocol surveys on and off-site in the western riparian areas where historic occurrences were reported¹.

Cooper's Hawk

Cooper's hawk is a state Watch List and a 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 to 50 feet above the ground; in conifers, nests are in horizontal branches or the main crotch. Cooper's hawks use patchy woodlands and edges with snags for perching and hunting small birds, small mammals, reptiles, and amphibians. Cooper's hawks are diurnally active and 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 riparian forest and eucalyptus woodland on and near the project site for nesting and scrub habitats for foraging. The species was observed on the project site during the 2018 least Bell's vireo and coastal California gnatcatcher surveys. In addition, Cooper's hawk has a potential to nest and forage within native riparian habitat associated with Chollas Creek in the off-site construction staging study area.

Coastal California Gnatcatcher

Coastal California gnatcatcher is a federally listed threatened species, SSC, and MSCP covered species. Coastal California gnatcatcher breeds in lower elevations (less than 500 meters or 1,640 feet) south and west of the Transverse and Peninsular Ranges. Higher densities of this species occur in coastal San Diego and Orange counties, and lower densities are found in Los Angeles, Orange, western Riverside, southwestern San Bernardino, and inland San Diego counties (Atwood 1993; Preston et al. 1998). The coastal California gnatcatcher primarily occupies open coastal sage scrub habitat that is dominated by California sagebrush. This species is relatively absent from coastal sage scrub habitats dominated by black sage (*Salvia mellifera*), white sage, or sugar sumac (*Rhus ovata*).

Coastal California gnatcatchers were observed within the project site and within 300 feet of the project footprint on all three survey passes in June and July 2018. No gnatcatcher nesting behavior was observed during focused surveys; however, quality coastal sage scrub habitat in the study area suggests that gnatcatchers are breeding in the area. Locations of observed gnatcatchers are shown

¹ Focused surveys for coastal California gnatcatcher and least Bell's vireo were conducted more than 24 months prior to the drafting of the BTR (Appendix D); therefore, the results from those surveys are only used anecdotally to inform likely presence of these species in the study area. The results from the focused surveys do not represent an official record of the most current resource condition of the site.

on Figure 5.4-1a and in the survey report (attached to Appendix D as Appendix G). In addition, coastal California gnatcatchers were heard foraging and dispersing in the Diegan coastal sage scrubs within the off-site construction staging study area during the 2024 biological reconnaissance (Figure 5.4-1b).

Wrentit

Wrentit is a U.S. Fish and Wildlife Service Bird of Conservation Concern (BCC) species known to inhabit a variety of communities in the coastal regions of western north America, from Oregon down to southern California and the northern Baja regions. This sedentary species prefers to nest and forage in low-growing shrublands and woodland areas, often found in association with sage scrub, chaparral, oak woodland, and riparian habitats. Wrentit may also occur in urban settings, utilizing planted landscapes to nest and forage. While the species is observed often at lower elevations, wrentit can also survive at higher elevations in more arid, inland regions (Appendix D).

Wrentit was observed incidentally over the course of multiple site visits conducted at the project study area. No nesting behavior was observed during any of the site visits; however, the habitats on the project site are suitable for nesting activity. There is also appropriate habitat for this species to nest and forage at the off-site study area.

Wildlife Corridors and Habitat Linkages

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

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. Although individual animals may not move through a habitat linkage, the linkage does represent a potential route for gene flow and long-term dispersal. Habitat linkages may serve as both habitat and 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 steppingstones for dispersal.

The project study area is located in the “Urban Area” of the City Subarea Plan. This area is characterized by fragmented MHPA associated with canyons surrounded by development. The

MSCP identifies core and linkage areas that includes large movement areas such as the San Diego and Otay River. There are no core or linkages identified in the Chollas Creek watershed. The project study area likely provides refuge and cover for urban-adapted wildlife species and their local movement but is unlikely to be a wildlife corridor as it is not connected to large blocks of habitat (e.g., Mission Trails Regional Park) and is bounded by residential development and significant roads and highways.

Off-Site Construction Staging Area

The off-site study area is also located in the “Urban Area” of the Subarea Plan and occurs in the Chollas Creek watershed. The off-site study area buffer includes a terminal segment of the MHPA associated with Chollas Creek and surrounding uplands to the north and northeast of the construction staging area boundary. There are no core or linkages identified in the Chollas Creek watershed. The undeveloped portions of the off-site study area likely provide refuge and cover for urban-adapted wildlife species and their local movement, including coastal California gnatcatcher dispersal, but is unlikely to be a wildlife corridor as it is not connected to large blocks of habitat (e.g., Mission Trails Regional Park) and is bounded by mixed development and significant roads and highways.

Wetlands Delineation

The project study area intersects a portion of Chollas Creek. Hydrology, vegetation, and soils were examined by Dudek biologists at two geographically distinct sampling locations, and results were recorded on wetland determination data forms to determine the presence or absence of wetland field indicators. An assessment of potential aquatic resources was also completed at the off-site construction staging study area.

Jurisdictional resources within the project study area and off-site construction staging study area are regulated by CDFW and the City, per the City’s Biology Guidelines, include 0.6-acres, comprised of riparian forest (southern willow forest), southern cottonwood-willow riparian forest, riparian forest (southern riparian forest), and riparian scrub (mulefat scrub). In addition, 0.26 acres of the natural flood channel and a 0.28-acre developed concrete-lined channel (i.e., non-wetland waters), represent the main flow path of Chollas Creek near the project study area and is also under the jurisdiction of USACE, RWQCB, CDFW, and the City (see Table 5.4-3). A separate tributary drainage originates from a storm drain outlet in the ornamental vegetation in the northeastern portion of the project site study area, likely contributes ephemeral flows and does not support wetland vegetation and therefore is classified as RWQCB and CDFW jurisdiction only (see Figure 5.4-1a).

The developed concrete-lined channel immediately north of the off-site construction staging study area is considered a disturbed wetland under the jurisdiction of the USACE, RWQCB, CDFW, and the

City. The concrete-lined channel supports the main flow path of Chollas Creek, which is characterized as a natural non-vegetated channel (i.e. non-wetland water) under the jurisdiction of USACE, RWQCB, CDFW, and the City (Table 5.4-3). Chollas Creek supports a southern cottonwood-willow riparian forest at the interconnection of the non-vegetated channel and the concrete-lined channel within the off-site construction staging study area that is also under the jurisdiction of CDFW and the City.

Table 5.4-3
Jurisdictional Resources
in the Project Study Area and Off-Site Construction Staging Study Area

Vegetation Community/ Land Cover Type	City of San Diego Biology Guidelines Vegetation Community	Jurisdiction (USACE/RWQCB/CDFW/City)	Acreage
<i>Wetlands</i>			
Southern Willow Riparian Forest	Riparian Forest	CDFW/City	.45
Southern Riparian Forest	Riparian Forest	CDFW/City	0.10
Mulefat Scrub	Riparian Scrub	CDFW/City	0.05
Southern Cottonwood-Willow Riparian Forest	Riparian Forest	CDFW/City	0.15
<i>Non-Wetland Waters of the United States and State</i>			
Natural Flood Channel	Natural Flood Channel	USACE/RWQCB/CDFW/City	0.26
Developed Concrete-lined Channel	Disturbed Wetland	USACE/RWQCB/CDFW/City	0.28
<i>Non-Wetland Waters of the State</i>			
Ornamental Plantings	Natural Flood Channel	USACE/RWQCB/CDFW/City	<0.01
Disturbed Land	Natural Flood Channel	USACE/RWQCB/CDFW/City	<0.01
Total ¹			1.29

Source: Appendix D.

Notes: ¹ Totals may not sum due to rounding.

5.4.2 REGULATORY FRAMEWORK

Federal

Federal Endangered Species Act

The federal or U.S. Endangered Species Act (U.S. ESA) 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 the ESA, it is unlawful to take any listed species. “Take” is defined in Section 3 (16 USC 1532[19]) of the ESA as “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.”

The ESA 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.” 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 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 Code of Federal Regulations 10.12). Migratory birds are not necessarily federally listed endangered or threatened birds under the ESA.

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.

Clean Water Act

Federal wetland regulation applicable to the project is guided by the Clean Water Act. 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 U.S. Army Corps of Engineers (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 the Regional Water Quality Control Board (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.

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 Endangered Species Act

The California ESA establishes state policy to conserve, protect, restore, and enhance threatened or endangered species and their habitats. Under the California ESA, CDFW is responsible for maintaining a list of threatened species and endangered species (California Fish and Game Code, Section 2070). CDFW also maintains a list of candidate species, which are species that CDFW has formally noticed as under review for addition to the threatened or endangered species list. CDFW also maintains lists of California species of special concern, which serve as watch lists. Pursuant to the requirements of the California ESA, an agency reviewing a proposed project within its jurisdiction must determine whether any state-listed endangered or threatened species may be present in the area and determine whether the proposed project would have a potentially significant impact on

such species. CDFW encourages informal consultation on any proposed project that may impact a candidate species.

California Fish and Game Code

Under the California Fish and Game Code, the California Department of Fish and Wildlife (CDFW), previously named California Department of Fish and Game, 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 it 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 active and covered under these California Fish and Game Code sections. Compliance with these state regulations is presumed to be part of the project.

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 study 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's 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 will 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). The project study area falls outside of these habitat linkages and core areas.

Environmentally Sensitive Lands Regulations

Environmentally Sensitive Lands (ESL) regulations are supplemental development regulations that are part of the SDMC, Chapter 14, Article 3, Division 1. These regulations are intended to ensure that development occurs in a manner that protects the overall quality of resources (SDMC 143.0101). ESL includes lands within the MHPA; VPHCP Minor Amendment Areas; lands that contain wetlands; vegetation communities classified as Tier I, II, IIIA, or IIIB; and habitat for rare, endangered, or threatened species or narrow endemic species (City of San Diego 2018). The Biology Guidelines provide guidance on permits required for projects that encroach on ESL. The Biology Guidelines also address requirements for project impacts analysis pertaining to wetlands and buffer limits within and outside the Coastal Overlay Zone, siting requirements to avoid the most sensitive portion of a site, and requirements for development outside the MHPA (City of San Diego 2018).

City of San Diego Biology Guidelines

The City of San Diego developed the Biology Guidelines presented in the Land Development Manual to aid in the implementation and interpretation of ESL Regulations and the Open Space Residential (OR-1-2) Zone (City of San Diego 2018). The guidelines also provide standards for the determination of impact and mitigation under CEQA and the California Coastal Act. Sensitive biological resources, as defined by the ESL Regulations, include lands within the MHPA, as previously discussed, as well as other lands outside of 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 the USACE. The City uses the criteria listed in Section 320.4(b)(2) of the USACE General Regulatory Policies (33 CFR 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 2018). 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 flood waters for flood and erosion control, sediment filtration, water purification, and groundwater recharge. The width of the buffer is determined by factors such as location within or outside of the Coastal Zone and type and size of development, sensitivity of the wetland resource to edge effects, topography, and the need for upland transition (City of San Diego 2018).

The SDMC 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 and location of mitigation in or out of the MHPA. The proposed project is an essential public facility, as identified in an adopted Land Use Plan. Examples of essential public facilities include identified circulation element roads, major water and sewer lines, publicly owned schools, parks, libraries, and police and fire facilities.

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 have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

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 CDFW or USFWS?*

Threshold

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 MSCP 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

Direct Impacts

Vegetation Communities

Construction of the fire station and associated Zone 1 brush management zone would result in direct, permanent impacts to 0.59 acres of vegetation communities including coastal sage scrub (including disturbed), mixed chaparral, disturbed land, and urban/developed land (see Figure 5.4-2a, On-Site Project Impacts). Direct impacts to sensitive vegetation communities including Tier III mixed chaparral and Tier II coastal sage scrub would occur totaling 0.501 acres.

Table 5.4-4 summarizes acreages for direct impacts to vegetation communities and provides a list of the corresponding Biology Guidelines habitat Tiers (City of San Diego 2018). All impacts would occur outside of the MHPA. All Zone 2 brush management areas would be considered impact neutral and as such, are not included in project impact calculations.

Table 5.4-4
Direct Impacts to Vegetation Communities and Land Cover Types
On-Site

Vegetation Community or Land Cover Type	City of San Diego Biology Guidelines Vegetation Community	City of San Diego Biology Guidelines Habitat Tier	Fire Station Footprint (Acres)	Brush Management Zone 1 (Acres)	Total^{1,2} (Acres)
<i>Native Vegetation Communities</i>					

Table 5.4-4
Direct Impacts to Vegetation Communities and Land Cover Types
On-Site

Vegetation Community or Land Cover Type	City of San Diego Biology Guidelines Vegetation Community	City of San Diego Biology Guidelines Habitat Tier	Fire Station Footprint (Acres)	Brush Management Zone 1 (Acres)	Total^{1,2} (Acres)
Coastal Sage Scrub (disturbed)	Coastal Sage Scrub	Tier II	0.0229	0.266	0.495
Mixed Chapparal	Mixed Chapparal	Tier IIIA	—	0.006	0.006
<i>Subtotal</i>			<i>0.229</i>	<i>0.272</i>	<i>0.501</i>
<i>Non-Native Vegetation Communities and Land Covers</i>					
Disturbed Land	Disturbed Land	Tier IV	0.017	0.013	0.029
Urban/Developed Land	Disturbed Land	N/A	0.007	0.008	0.015
<i>Subtotal</i>			<i>0.024</i>	<i>0.021</i>	<i>0.044</i>
Total			0.253	0.338	0.590

Source: Appendix D.

Notes:

¹ Totals may not sum due to rounding.

² Brush Management Zone 2 is impact neutral and is not included in project impact calculations.

The proposed project also includes an off-site construction staging area (referred to as the off-site study area) that would be used to store construction equipment. Disturbance to this site would result in temporary, direct impacts to 0.039 acres of Baccharis-dominated coastal sage scrub (Figure 5.4-2b, Off-Site Construction Staging Area Impacts). Table 5.4-5 details the temporary direct impacts to vegetation communities and land cover types at the off-site construction staging area. All impacts would occur outside the MHPA.

Table 5.4-5
Off-Site Construction Staging Area – Temporary Direct Impacts to Vegetation Communities and Land Cover Types

Vegetation Community or Land Cover Type	City of San Diego Biology Guidelines Vegetation Community	City of San Diego Biology Guidelines Habitat Tier	Construction Staging Area (Acres)
<i>Native Vegetation Communities</i>			
Coastal Sage Scrub: <i>Baccharis</i> -dominated	Coastal Sage Scrub	Tier II	0.39
<i>Non-Native Vegetation Communities and Land Covers</i>			
Non-Native Vegetation	Disturbed Land	Tier IV	0.076
Urban/ Developed Land	Disturbed Land	N/A	0.408
Total			0.523

Source: Appendix D.

Special-Status Plants

One special-status plant species was detected within the project study area during the 2019 rare plant surveys: San Diego County viguiera (Figure 5.4-1a). While San Diego viguiera is present throughout the project study area, it does not intersect the project impact footprint; therefore, direct impacts to this species would be avoided. No special-status plant species were detected within the off-site study area. Therefore, direct impacts to special-status plants in the project impact footprint area and off-site construction staging area would be avoided.

Special-Status Wildlife

There are 14 special-status wildlife species (federal, state, or local status) with moderate or high potential to occur within the project study area. Of these, Cooper’s hawk, wrentit, and coastal California gnatcatcher were observed during focused surveys within the project study area. Coastal California gnatcatcher was also incidentally detected within the off-site construction study area buffer during the 2024 biological reconnaissance. As such, project impacts to coastal California gnatcatcher, Cooper’s hawk, and wrentit would be anticipated.

There is no suitable habitat for least Bell’s vireo within the project impact footprint and, although not a current representation of their presence in the project study area, the species was not detected during focused surveys in 2018. In addition, the limited southern cottonwood-willow riparian forest

associated with Chollas Creek north of the off-site construction staging area is narrow and situated within an urban area, so it is unlikely to support least Bell's vireo. However, no focused surveys were conducted within the off-site study area. Given that the project would not result in removal of suitable habitat for least Bell's vireo direct impacts to this species are not expected to occur.

Compliance with the MBTA (16 USC 703–712) and California Fish and Game Code (Sections 3503 and 3503.5) is standard permit condition and required as part of project. Compliance with this standard permit requirement would ensure direct impacts to nesting birds would be avoided.

Direct project impacts could occur to special-status wildlife determined to have a moderate to high potential to occur within the project study area including orange-throated whiptail, San Diegan tiger-whiptail, red-diamondback rattlesnake, Allen's hummingbird, California thrasher, two-striped garter snake, Dulzura pocket mouse, northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, San Diego desert woodrat, Yuma myotis, monarch, and Crotch's bumble bee, as discussed further in Appendix D. In addition, there is the potential for the project to result in permanent direct impacts to nesting Crotch's bumble bee which have a moderate potential to occur within the project impact footprint (i.e., grading areas, not including Zone 2 Brush Management Area).

Indirect Impacts

Vegetation Communities

Eight native vegetation communities were mapped adjacent to the project impact footprint – coastal sage scrub (including disturbed), coastal sage scrub (Baccharis-dominated), coastal sage scrub (Rhus-dominated), mixed chaparral, riparian forest (southern willow forest), riparian forest (southern riparian forest), riparian scrub (mulefat scrub) and natural flood channel. In addition, there are three native vegetation communities mapped adjacent to the off-site construction staging area: coastal sage scrub (Baccharis-dominated), southern cottonwood-willow riparian forest, and non-vegetated channel. Short-term indirect impacts that may disrupt plant vitality in non-impacted vegetation communities include dust, erosion, invasive plant species, temporary access impacts, and increased human presence.

Special-Status Plants

Potential indirect impacts to off-site sensitive plant species would be similar to those previously described for vegetation communities (increased human presence, dust, etc.).

Special-Status Wildlife

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 construction-related noise, which can result in the disruption of foraging, nesting, and reproductive activities.

The project includes an emergency generator that would run once a week, typically after 7am, to ensure functionality and run when a power outage occurs. Although noise from the emergency generator may occur during the breeding season and may have adverse indirect effects to special-status wildlife, appropriate barriers have been incorporated into the design to minimize noise impacts. In addition, generator testing would be a short-term event. While power outages are unpredictable, the generator usage would be minimized to the extent possible, and the designed noise barriers would substantially reduce the noise level (as discussed in Section 5.10, Noise).

The project is located outside the MHPA and edge effects from adjacent development, including noise during emergency conditions from generator use, comply with the Land Use Adjacency Guidelines. The relevant guideline is as follows:

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.

The project study area supports suitable vegetation for bird nesting, including trees associated with the street and property landscaping, and coastal sage scrub vegetation. The off-site study area also supports adjacent suitable vegetation for bird nesting including Baccharis-dominated coastal sage scrub and trees associated with street landscaping. Indirect impacts from construction-related noise may occur to breeding wildlife if construction occurs during the breeding season (i.e., February 1 through September 15). Wildlife that would be significantly affected by noise based on suitable habitat in the project vicinity and in the vicinity of the off-site study area, may occur up to 300 feet from the project work areas (in accordance with the City Biology Guidelines) (City of San Diego 2018). Special-status species whose breeding/nesting have potential to be affected by noise include all raptor species (regardless of location relative to the MHPA), least Bell's vireo, and coastal California gnatcatchers (within the MHPA only).

Significance of Impact

Direct Impacts

Vegetation Communities and Land Covers

The proposed project would result in direct permanent impacts to sensitive vegetation communities from construction of the impact footprint and associated Zone 1 Defensible Space. Direct impacts to sensitive vegetation communities including Tier II coastal sage scrub and Tier IIIA mixed chaparral would occur totaling 0.501 acre. Direct impacts greater than 0.1 acres to Tier I-III habitats (City of San Diego 2018), including coastal sage scrub (all varieties) and mixed chaparral are considered **potentially significant** absent mitigation (Issue BIO-1).

The proposed off-site construction staging area would result in direct, temporary impacts to 0.039 acres of coastal sage scrub that would be reduced to **less than significant** with implementation of **AM-BIO-3** which ensures revegetation of temporarily impacts coastal sage scrub.

Special-Status Wildlife

Since the project would comply with the City of San Diego's LUAG and because the project impact footprint is outside of the City's MHPA, direct impacts to coastal California gnatcatchers and Cooper's hawk, which are MSCP Covered Species, as a result of the project are less than significant. Direct impacts to wrentit, which not listed as rare, threatened, or endangered and is not an MSCP Covered Species, as a result of the project are less than significant, in accordance with the City's thresholds of significance.

Direct project impacts could occur to special-status wildlife determined to have a moderate to high potential to occur within the project study area including orange-throated whiptail, San Diegan tiger-whiptail, red-diamondback rattlesnake, Allen's hummingbird, California thrasher, two-striped garter snake, Dulzura pocket mouse, northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, San Diego desert woodrat, Yuma myotis, monarch, and Crotch's bumble bee. Direct impacts to these species would be reduced through compliance with the LUAG and the City's standard avoidance and resource protection measures (**AM-BIO 1a** through **1c**). However, impacts to Tier II and III upland habitats represent a loss of suitable habitat for these species and is considered a potentially significant impact (Issue BIO-1). In addition, there is the potential for the project to result in permanent direct impacts to nesting Crotch's bumble bee which have a moderate potential to occur within the project impact footprint (i.e., grading areas, not including Zone 2 Brush Management Area). This is considered a **potentially significant** impact (Issue BIO-2).

Indirect Impacts

Vegetation Communities

The proposed project would result in short term indirect impacts to sensitive vegetation communities adjacent to the project impact footprint. Short-term indirect impacts include dust, erosion, invasive plant species, temporary access impacts, and increased human presence. These short-term indirect impacts would be reduced to **less than significant** through compliance with the LUAG and the implementation of required avoidance measures (**AM-BIO-1a** through **1c**) and standard construction stormwater pollution prevention requirements.

Special-Status Plants

The proposed project would result in potential short term indirect impacts to off-site special-status plant species similar to those previously described for vegetation communities (increased human presence, dust, etc.). These short-term indirect impacts would be reduced to **less than significant** through compliance with the LUAG and the implementation of required avoidance measures (**AM-BIO-1a** through **1c**) and standard construction stormwater pollution prevention requirements.

Special-Status Wildlife

Indirect impacts to most species would be reduced to less than significant through features incorporated into the design of the project (e.g. masonry walls around noise generator) as well as compliance with standard permit conditions as described in **AM-BIO-1a** through **AM-BIO-1c** and **AM-BIO-2**. However, noise impacts could still occur to least Bell's vireo that are assumed present in suitable habitats adjacent to the project impact footprint and off-site study area and would be **potentially significant**, absent mitigation.

Mitigation

Mitigation Measures for Direct Impacts

To mitigate direct impacts to sensitive vegetation communities (Issue BIO-1) and sensitive species (Issue BIO-2 and BIO-3), the project would be required to implement compensatory habitat mitigation. While avoidance and resource protection measures are not considered mitigation measures, applicable City avoidance measures for the project are listed below to ensure compliance and clearly outline their requirements. The avoidance measures listed are standard permit

conditions that the City has developed to ensure compliance with the City's Biology Guidelines and MSCP.

Proposed mitigation ratios for permanent impacts to sensitive vegetation communities were determined based on the location of the impacts relative to the MHPA (all impacts are outside of the MHPA) and are consistent with the City's Biology Guidelines (City of San Diego 2018). In accordance with the City's Biology Guidelines (City of San Diego 2018), the small development impact footprint (less than 5 acres) and lower long-term conservation value of the site (being within a disturbed urban area and immediately adjacent to an existing roadway) make the project eligible for mitigation through payment into the Habitat Acquisition Fund (HAF) or deduction of credits from an approved mitigation bank (e.g., MSCP Cornerstone Mitigation Bank). Table 5.4-6 outlines the mitigation requirements for permanent impacts.

Table 5.4-6
Mitigation for Impacts to Upland Vegetation Communities and Land Cover Types in the Project Impact Footprint

Vegetation Community or Land Cover Type	City of San Diego Biology Guidelines Vegetation Community	City of San Diego Biology Guidelines Habitat Tier	Impacts (Acres)	Mitigation Ratio (For Impacts Outside MHPA/ Preservation Inside MHPA)	Mitigation Required (acres)
<i>Native Vegetation Communities</i>					
Coastal Sage Scrub (disturbed)	Coastal Sage Scrub	Tier II	0.0495	1.1*	0.495
Mixed Chapparal	Mixed Chapparal	Tier IIIA	0.006	0.5:1**	0.003
<i>Native Subtotal</i>			<i>0.501</i>	—	<i>0.498</i>
<i>Non-Native Vegetation Communities and Land Covers</i>					
Disturbed Land	Disturbed Land	Tier IV	0.029	0:1	0
Urban/ Developed Land	Disturbed Land	N/A	0.015	0:1	0
<i>Non-Native Subtotal</i>			<i>0.044</i>	—	<i>0</i>
Total Impacts (Outside MHPA) and Mitigation (Inside or Outside MHPA)			0.546	—	0.498***

Source: Appendix D.

Notes: *Mitigation ratio for Tier II habitat is 1:1 if mitigation occurs in the MHPA and is 1.5:1 if mitigation occurs outside the MHPA. If mitigation occurs outside the MHPA, total mitigation required for Tier II habitat is 0.743 acre.

** Mitigation ratio for Tier IIIA habitat is 0.5:1 if mitigation occurs inside the MHPA and is 1:1 if mitigation occurs outside the MHPA.

*** Mitigation totaling 0.498 acre is required if mitigation occurs inside the MHPA; if mitigation occurs outside the MHPA the mitigation requirement is 0.749 acre.

MM-BIO-1 Coastal Sage Scrub. To compensate for the loss of 0.495 acres of coastal sage scrub (including disturbed) and 0.006-acres of mixed chaparral, mitigation would be provided through allocation of credits from the Marron Valley Cornerstone Land Bank, which occurs inside the MHPA. Payment and credit allocation shall be provided for a total of 0.498 acres to achieve the required mitigation ratios prior to the start of construction (Table 5.4-6). The City of San Diego Engineering and Capital Projects Department (ECP) shall be required to contribute the estimated average per acre land cost, multiplied by the mitigation ratio plus any required amount for administration.

MM-BIO-2 Crotch's Bumble Bee. Prior to the Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, the City of San Diego Environmental Designee (ED) shall verify the following project requirements regarding the Crotch's bumble bee are shown on the construction plans:

- A.** To avoid impacts to 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 removal of habitat in the proposed area of disturbance must occur during the colony active period, a Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of Crotch's bumble bee nesting within the proposed area of disturbance and follow the methodology developed consistent with the California Department of Fish Wildlife (CDFW) Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (CDFW 2023).
- B.** A Qualified Biologist shall demonstrate the following qualifications: at least 40 hours of experience surveying for bee or other co-occurring aerial invertebrate species (such as Quino checkerspot butterfly) and who have completed a Crotch's bumble bee detection/identification training by an expert Crotch's bumble bee entomologist; or the biologist must have at least 20 hours of experience directly observing Crotch's bumble bee.

- C. The pre-survey shall be conducted by the Qualified Biologist within 30 calendar days prior to the start of construction activities (including removal of vegetation) and shall include a minimum of three (3) visits, a minimum of one (1) week apart.
- D. The Qualified Biologist/owner permittee shall submit the results of the pre-construction survey to City DSD (Mitigation Monitoring and Coordination), City Planning Department (MSCP) staff, and CDFW for review and written approval prior to initiating any construction activities.
- E. If Crotch's bumble bees are determined to be present, then a photographic survey following CDFW guidance (i.e., CDFW Survey Considerations for CESA Candidate Bumble Bee Species) shall be required. If additional activities (e.g., capture or handling) are deemed necessary based on photographic surveys, then the Qualified Biologist shall obtain 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.
- F. If preconstruction surveys identify active Crotch's bumble bee nest colonies, the Qualified Biologist shall notify CDFW in writing and establish, monitor, and maintain no-work buffers around the nest(s) and any associated floral resources. The size and configuration of the no-work buffer shall be based on best professional judgment of the Qualified Biologist in consultation with CDFW. At a minimum, the buffer shall provide at least 50 feet of clearance from construction activities around any nest entrances and maintain disturbance-free airspace between the nest and nearby floral resources. Construction activities shall not occur within the no work buffers until the colony is no longer active (i.e., no bees are seen flying in or out of the nest for three consecutive days indicating the colony has completed its nesting season and the next season's queens have dispersed from the colony).

Avoidance Measures

As previously stated, the following avoidance and resource protection measures are standard permit conditions that the City has developed to ensure compliance with the City's Biology Guidelines and MSCP and are not included as mitigation measures. These conditions reduce several potential direct impacts to biological resources to less than significant.

AM-BIO-1a Measures Prior to Construction

- A. Biologist Verification:** The Engineering & Capital Project Department shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2018), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.
- B. Preconstruction Meeting:** The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.
- C. Biological Documents:** The Qualified Biologist shall submit all required documentation to the MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.
- D. BCME:** The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME) which includes the biological documents listed in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.
- E. Avian Protection Requirements:** To avoid any direct impacts to the least Bell's vireo, Cooper Hawk, and yellow warbler, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds within the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The survey area shall cover the limits of disturbance and 300 feet from the area of

disturbance. The results of the pre-construction survey shall be submitted to City Development Services Department (DSD) for review and approval prior to initiating any construction activities. If nesting least Bell's vireo, Cooper Hawk, and yellow warbler are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable state and federal laws (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 the least Bell's vireo, Cooper Hawk, and yellow warbler or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City DSD for review and approval and implemented to the satisfaction of the City. The City's MMC and Qualified Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction.

- F. Resource Delineation:** Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions, as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including least Bell's vireo, Cooper Hawk, and yellow warbler) during construction. Appropriate steps/care shall be taken to minimize attraction of nest predators to the site.
- G. Education:** Prior to commencement of construction activities, the Qualified Biologist shall meet with the project contractor and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

AM-BIO-1b Measures During Construction

- A. Monitoring:** All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSV). The CSV shall be e-mailed to the MMC on the 1st day of monitoring, the 1st week of each month, the

last day of monitoring, and immediately in the case of any undocumented condition or discovery.

- B. Subsequent Resource Identification:** The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna on site (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state or federal regulations have been determined and applied by the Qualified Biologist.

AM-BIO-1c. Post Construction Measures

Follow-Up Reporting: In the event impacts exceed previously identified acreage amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, CEQA, and other applicable local, state and federal laws. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City MMC within 30 days of construction completion.

Mitigation Measures for Indirect Impacts

The project may result in significant indirect impacts to nesting least Bell's vireo which have a moderate potential to occur adjacent to project construction areas. Excessive noise in proximity to active least Bell's vireo nest may result in nest failure which can be considered take, which is not authorized under the City's MSCP and therefore would be significant, absent mitigation.

MM-BIO-3 Avoidance of LBVI and SWFL Take. Prior to the issuance of a grading permit (or preconstruction meeting if a grading permit is not required), the City's (ED)/ Mitigation Monitoring Coordination staff (MMC) shall verify that Multi-Habitat Planning Area (MHPA) boundaries and the requirements regarding the least Bell's vireo and southwestern willow flycatcher, as specified below, are shown on the construction plans.

No clearing, grubbing, grading, or other construction activities shall occur during the least Bell's vireo breeding season (March 15 through September 15) or southwestern willow flycatcher habitat during the southwestern willow flycatcher breeding season (May 1 through September 1) until the following requirements have been met to the satisfaction of the ED/MMC:

1. 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 decibels [dB(A)]

hourly average for the presence of the least Bell's vireo and southwestern willow flycatcher. Surveys for least Bell's vireo, shall be conducted pursuant to the protocol survey guidelines established by the USFWS within the breeding season prior to the commencement of any construction. If least Bell's vireo or southwestern willow flycatcher are present, then the following conditions must be met:

- a. March 15 through September 15 for least Bell's vireo, no clearing, grubbing, or grading of occupied habitat shall be permitted. May 1 through September 1 for southwestern willow flycatcher no clearing, grubbing, or grading through occupied habitat shall be permitted.
- b. Areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; and
- c. March 15 through September 15 for least Bell's vireo 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 habitat. May 1 through September 1 for southwestern willow flycatcher 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 habitat. An analysis showing that noise generated by construction activities shall not exceed 60 dB(A) hourly average at the edge of occupied habitat must be completed by a Qualified Acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the ED/MMC 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,
- d. At least 2 weeks prior to the commencement of construction activities, under the direction of a Qualified Acoustician, attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities would not exceed 60 dB(A) hourly average at the edge of habitat occupied by the least Bell's vireo or southwestern willow flycatcher. 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 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, construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (September 16 and September 2 for the LBVI and SWFL, respectively). Construction noise monitoring 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 Qualified Biologist and the ED/MMC, 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.

2. If least Bell's vireo and southwestern willow flycatcher are not detected during the protocol surveys, the Qualified Biologist shall submit substantial evidence to the ED/MMC and applicable resource agencies that demonstrates whether or not mitigation measures such as noise walls are necessary from March 15 through September 15 for least Bell's vireo and May 1 through September 1 for southwestern willow flycatcher, adherence to the following is required:
 - a. If this evidence indicates that the potential is high for least Bell's vireo and southwestern willow flycatcher to be present based on historical records or site conditions, then Condition 1(a) shall be adhered to as specified above.
 - b. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

Avoidance Measures

The following avoidance and resource protection measures are standard permit conditions that the City has developed to ensure compliance with the City's Biology Guidelines, LUAG and MSCP and are not included as mitigation measures. These conditions reduce several potential direct and indirect impacts to biological resources to less than significant.

The project is located outside the MHPA and edge effects from adjacent development, including noise during emergency conditions from generator use, comply with the Land Use Adjacency Guidelines. The relevant guideline is as follows:

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.

AM-BIO-2 LUAG Compliance Measures

Coastal California gnatcatcher: Prior to construction, the City's Environmental Designee (ED or Mitigation Monitoring and Coordination [MMC] staff) shall verify that the MHPA boundaries and the project requirements regarding the California gnatcatcher, specified as follows, are shown on the construction plans.

No clearing, grubbing, grading, or other construction activities shall occur during the California gnatcatcher breeding season (March 1 to August 15), until the following requirements have been met to the satisfaction of the City's ED (or MMC staff):

1. Between March 1 and August 15, no clearing, grubbing, or grading of occupied California gnatcatcher habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; and
2. 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 California gnatcatcher habitat in 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 shall be completed by a Qualified Acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the MMC staff 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
3. At least 2 weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, temporary noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities shall not

exceed 60 dB(a) hourly average at the edge of habitat occupied by the 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 Qualified 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). Construction noise monitoring 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 Qualified Biologist and the MMC, 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.

4. Presence/absence of coastal California gnatcatchers shall be determined through protocol surveys conducted by a Qualified Biologist (possessing a valid Endangered Species Act Section 10 (a)(1)(A) Recovery Permit). If coastal California gnatcatchers are not detected during the protocol survey, the Qualified Biologist shall submit substantial evidence to MMC, U.S. Fish and Wildlife Service, and California Department of Fish and Wildlife staff that demonstrates whether or not measures, such as temporary noise attenuating walls, are necessary between March 1 and August 15 as follows:
 - a. If this evidence indicates the potential is high for coastal California gnatcatcher to be present based on historical records or site condition, then Condition 3 above shall be adhered to.
 - b. If this evidence concludes that no impacts to this species are anticipated, no measures would be necessary.

AM-BIO-3 Temporary Impact Revegetation

Temporary disturbance of 0.039 acre of Diegan coastal sage scrub within the off-site construction staging area shall be revegetated in accordance with the City of San Diego Landscape Standards included in the City's Land Development Manual. Habitat revegetation shall feature native species that are typical of the area, and erosion control features shall include silt fence and straw fiber rolls, where appropriate (e.g., in areas where sheet flow during rain events may cause erosion).

The revegetation areas shall be monitored and maintained for a minimum of 25 months to ensure adequate establishment and sustainability of the plantings/seedlings to reduce the risk of erosion and/or non-native, invasive plant species establishment, in accordance with the Landscape Standards in the City's Land Development Manual.

Significance of Impact After Mitigation

Direct Impacts

Vegetation Communities

Implementation of **MM-BIO-1** would provide compensatory mitigation in accordance with the City's Biological Guidelines (City of San Diego 2018) and direct impacts to sensitive vegetation communities and special-status wildlife that may use those habitats would be reduced to **less than significant** through long-term conservation of similar lands. Temporary off-site study area impacts to Diegan coastal sage scrub would be revegetated following compliance with the City's standard revegetation requirements (**AM-BIO-3**) resulting in no permanent loss of native vegetation communities; therefore, the impact is **less than significant**.

Special-Status Plants

The proposed project would result in no direct impacts to special-status plant species. Although San Diego viguiera is present throughout the project study area, it does not intersect the project impact footprint; therefore, direct impacts to this species would be avoided. No special-status plant species were detected within the off-site study area footprint and **no direct impacts** would occur.

Special-Status Wildlife

The project may result in direct impacts to special-status wildlife species including coastal California gnatcatcher, Cooper's Hawk, and Crotch bumble bee that would be considered significant absent mitigation. Impacts to Tier II and III upland habitats represent a loss of suitable habitat for these species that requires habitat-based mitigation in accordance with the City's Subarea Plan and Biology Guidelines. Compliance with **MM-BIO-1** would reduce the impact to **less than significant**. There is also the potential for direct impacts to nesting Crotch's bumble bee. Implementation of **MM-BIO-2** would reduce impacts to **less than significant** through avoidance of construction within Crotch's active bumble bee nest colonies.

Indirect Impacts

Vegetation Communities

Short-term indirect impacts to sensitive vegetation communities would be reduced to **less than significant** through compliance with the LUAG and the implementation of avoidance measures **AM-BIO-1a** through **1c** and standard construction stormwater pollution prevention requirements.

Special-Status Wildlife

The proposed project would result in short-term indirect impacts from construction-related noise to off-site special-status wildlife that would be reduced to a **less-than-significant** level with mitigation and nesting bird season avoidance. Indirect impacts to most species would be reduced to less than significant through compliance with standard permit conditions as described in **AM-BIO-1a** through **AM-BIO-1c** and **AM-BIO-2**. However, noise impacts could still occur to least Bell's vireo that are assumed present in suitable habitats adjacent to the project impact footprint and off-site study area. (**MM-BIO-3**). With implementation of **MM-BIO-3**, indirect impacts to least Bell's vireo would be reduced to **less than significant**.

Special-Status Plants

The proposed project would result in short term indirect impacts to off-site special-status plants, similar to those previously described for vegetation communities (increased human presence, dust, etc.) that would be reduced to a reduced to **less than significant** through adherence to **AM-BIO-1a** through **1c** and standard construction stormwater pollution prevention requirements.

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?*

Threshold

In accordance with the City's Significance Determination Thresholds (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

Direct Impacts

Implementation of the project would not result in any direct impacts to waters of the U.S. or state, including wetlands. In addition, the project would not impact riparian areas and/or wetlands considered jurisdictional by CDFW and/or the City (City of San Diego 2018). Utilization of the off-site construction staging area would also not result in direct impacts to any waters of the U.S. or state, including wetlands and riparian areas or wetlands, as defined by the City.

Indirect Impacts

The project study area contains areas of disturbed land, ornamental plantings, and a natural flood channel which are regulated by the USACE, RWQCB, CDFW, and the City as wetlands and non-wetland waters of the United States and state. Additional areas of riparian forest (southern willow forest), riparian forest (southern riparian forest), and riparian scrub (mulefat scrub) would be regulated by CDFW and the City as wetlands. Furthermore, the off-site study area contains a non-vegetated channel and a concrete-lined channel associated with Chollas Creek regulated by the USACE, RWQCB, CDFW, and the City as wetlands and non-wetland Waters of the United States and state. Additional areas of southern cottonwood-willow riparian forest would be regulated by CDFW and the City as wetlands.

Waters of the United States 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.

The wetland buffer established for the project varies between 70 and 78 feet in width around the project impact footprint and the project would not result in direct impacts to the buffer. No wetland buffer is required at the off-site study area since no permanent structures or development are proposed.

This wetland buffer width, along with characteristics of the buffer area (vegetation communities present, etc.), provides protection for the functions and values of the City as wetlands, according to the City's Biology Guidelines (City of San Diego 2018) and Section 320.4(b)(2) of the USACE General Regulatory Policies, as follows:

A. Wildlife habitat: the disturbed coastal sage scrub, ornamental plantings, and mixed chaparral habitat provide nesting and foraging habitat for wildlife species in the area,

including birds, and would be sufficiently wide enough (i.e., 70-78 feet) to be utilized by these species.

B. Food Chain Productivity: similar to functions related to wildlife habitat, the wetland buffer would provide food chain productivity through establishing areas, both native and non-native, where wildlife, including birds, can forage. The buffer would also be sufficiently wide enough (i.e., 70-78 feet) to contribute to food chain productivity in the area.

C. Water Quality: the wetland buffer is sufficiently wide (i.e., 70-78 feet) and is also densely vegetated with native and non-native species to provide effective water quality protection function to the adjacent City wetland habitats through natural filtering of surface flows that would move through the wetland buffer during storm events which eventually enter adjacent City wetlands.

D. Ground Water Recharge: in addition to protecting water quality as surface flows travel across the area, the wetland buffer would also provide opportunity for ground water recharge in the area since the 70-78-foot width would provide sufficient opportunity for some of the surface flows to percolate through the Huerohuero loam soils into the groundwater table.

E. Protection from Storm and Flood Waters: the 70 to 78-foot extent and vegetation coverage in the wetland buffer are both wide and dense enough, respectively, to provide protection to surrounding areas, including the proposed fire station, from storm and flood waters that may occur during high storm events based on the site topography and frequency of flows through the study area. The proposed project site boundary does not intersect with the 100-year Federal Emergency Management Agency (FEMA) floodplain boundary but does intersect with the 500-year FEMA floodplain boundary (FEMA 2024).

The nearest wetland resource is more than 70 feet north of the project footprint impact area. Given the characteristics of the wetland and site development, this wetland buffer width is adequate to preserve the functions and values of the wetland resources that are adjacent to the project impact footprint in accordance with the City's Biology Guidelines (City of San Diego 2018). Therefore, the existing buffer characteristics are in compliance with the City's Biology Guidelines (City of San Diego 2018) and would result in no net loss of City wetland from implementation of the project.

Significance of Impact

Direct Impacts

The project would result in **no direct impacts** to jurisdictional resources and wetlands.

Indirect Impacts

The project would result in indirect impacts to adjacent jurisdictional resources that would be reduced to **less than significant** through implementation of avoidance and resource protection measures (**AM-BIO-1a** through **1c**) and standard construction stormwater pollution prevention requirements.

Mitigation

The project would require implementation of avoidance and resource protection measures (**AM-BIO-1a** through **1c**) and standard construction stormwater pollution prevention requirements.

Significance of Impact After Mitigation

Impacts would be reduced to less than significant through implementation of avoidance and resource protection measures (**AM-BIO-1a** through **1c**) and standard construction stormwater pollution prevention requirements.

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, or impede the use of native wildlife nursery sites?

Threshold

In accordance with the City's Significance Determination Thresholds (2022), 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.

Direct Impacts

The proposed project would not 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. As discussed in Section 5.4.1, Existing Conditions, the project site is not within the designated MHPA and is not located within a designated key biological core and linkage area, as noted in the City's

MSCP Subarea Plan (City of San Diego 1997). The project study area and off-site study area likely provides limited refuge and cover for wildlife species and their movements.

Indirect Impacts

While the project study area and off-site study area are not considered wildlife corridors or habitats linkages, due to the proximity of the project site and off-site construction staging area to adjacent MHPA lands, the project is required to comply with the City's Land Use Adjacency Guidelines (LUAG) (City of San Diego 1997).

Significance of Impact

The project would result in **no direct impacts** to wildlife movement, corridors, habitat linkages, or nursery sites. The project would result in **less-than-significant** indirect impacts to wildlife corridors or habitat linkages. The project would minimize impacts through compliance with the LUAG, as discussed in Issue 5 below.

Mitigation

No mitigation would be required.

5.4.3.4 Issues 5 and 6: MSCP Conflict and Edge Effects

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?*

Threshold

In accordance with the City's Significance Determination Thresholds (2022), the project would have a significant impact if it would:

- Result in a conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region.
- Introduce land use within an area adjacent to the MHPA that would result in adverse edge effects.

Impact

The proposed project would be located adjacent to the MHPA; a small portion (0.02-acre) of the proposed Zone 2 Brush Management Area overlaps with the MHPA. Per Section 1.4.2 of the City's MSCP Subarea Plan, Zone 2 Brush Management is considered a conditionally compatible use within the MHPA subject to certain general planning policies and design guidelines. In general, the project is located on the least sensitive portion of the property, adjacent to 47th Street and as far from Chollas Creek as possible. Measures such as walls have been incorporated into the project design to reduce the width of brush management zones. Consistency of the project with the MSCP LUAG is detailed below.

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.

The proposed fire station would be situated at the top of a canyon that drains towards the MHPA. Construction of the fire station would be completed in a manner consistent with the City's Storm Water Standards. During construction, measures to reduce runoff and prevent adverse impacts related to drainage would be required as standard permit conditions. Following construction, the project's drainage design minimizes stormwater flows toward the MHPA by routing stormwater runoff into an on-site biofiltration system followed by an underground detention system. The underground detention system would discharge into an existing 18-inch storm drainpipe. These stormwater management measures ensure that the release of toxins, chemicals, and other pollutants, as well as potentially erosive flows or sedimentation, are minimized within the MHPA.

The off-site study area would be situated on flat developed land and stormwater runoff would discharge into the existing storm drains along Federal Boulevard immediately south of the study area, away from 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.

During construction, the contractor is required to maintain a Storm Water Pollution Prevention Plan (SWPPP) that includes measures to safely store construction-related toxins, such as fuel. After construction, the fire station is designed with an appropriate trash enclosure, fuel tanks, and other operational procedures to safely store chemicals and ensure spills into the MHPA are avoided. The proposed walls around the fire station would also minimize the potential for toxins to enter the

MHPA. The temporary construction staging area shall be maintained in accordance with the SWPPP and to ensure spills into the MHPA to the northeast are avoided.

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.

The fire station would include exterior lighting and light fixtures to aide in the functions of providing emergency services, but these lights would be directed away from the MHPA. All exterior lighting on the building façade and elsewhere on the property would be designed to be directed away from the MHPA. A 6-foot-tall fire wall along the southern project boundary would provide additional shielding of any light from the building.

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.

Effects from short-term construction and long-term operational noise on covered species that have a moderate to high potential to forage, roost, and nest in the project study area may occur. Covered species with potential to occur in the project study area include California gnatcatcher, least Bell's vireo, and Cooper's hawk. These effects are most severe during the breeding season, as they may negatively affect species' ability to reproduce.

Clearing, grubbing, and grading associated with short-term construction activities would result in noise levels that could affect habitat occupied by breeding California gnatcatcher, least Bell's vireo, or raptors including Cooper's hawk.

Long-term operational noise is primarily oriented to the south, because walls and site grading separate the proposed building from the MHPA to the north. Consistent operational noise such as roof-mounted air conditioning units are expected to emit minimal noise and would be consistent with the existing urban environmental setting. Sporadic noise from sirens and other infrequent noise emitters, such as the emergency generator, are not expected to result in consistently elevated noise levels that would substantially change overall noise levels within the adjacent MHPA. The on-site emergency generator would be enclosed with solid masonry walls 16 feet in height. As described in Section 5.10, Noise of this EIR, infrequent noise emitters, such as the emergency generator, are not expected to result in consistently elevated noise levels that would substantially

change overall noise levels within the adjacent MHPA. As such, the project would comply with the LUAGs related to noise.

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.

A portion of the project impact footprint runs along the boundary of the MHPA and the siting of the fire station would discourage public access and domestic animal activity within the MHPA. The project includes barriers to entry into the MHPA including walls, fencing, and landscaping. The project is nearest to the MHPA at the southwest corner where a 6-foot-tall fire wall would be constructed along the southern project boundary to further provide a barrier between the building and the MHPA.

Invasives: No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.

The project would incorporate landscaping and a Zone 1 Defensible Space that would be lightly vegetated with a non-habitat forming, native species palette. All plant species installed within 100 feet of the MHPA shall comply with the Landscape Regulations (LDC142.0400 and per table 142-04F, Revegetation and Irrigation Requirements) and be non-invasive. The proposed landscape plan was reviewed to confirm no invasive plant species (as listed by the California Invasive Plant Council [Cal-IPC Inventory]) are included.

Brush Management: New residential 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.

The project would have Zone 1 and 2 brush management areas and is sited above and adjacent to the MHPA. The project incorporates a Zone 1 Defensible Space area that is outside of the MHPA and sited within the development pad in the project's impact footprint. Although the Zone 2 Brush Management area would encroach into the MHPA, this activity is considered impact neutral and is an approved use within the MHPA, according to the City's Subarea Plan and Biology Guidelines. Therefore, no impacts from Brush Management would occur within the MHPA.

Grading/Land Development: Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.

The project impact footprint is proposed to be contoured and graded for construction of the fire station. All manufactured slopes and grading associated with the project would occur within the impact footprint which is located outside the MHPA.

Area Specific Management Directives

Orange-throated Whiptail

Area specific management directives must address edge effects.

Edge effects and disturbance to this species would be reduced and minimized through compliance with the LUAG, as described above. In addition, since the project impact footprint would not overlap with the City's MHPA, no clearing of occupied habitat within the MHPA would occur as a result of the project's construction. Pursuant to San Diego Municipal Code Section 142.0412, brush management activities are prohibited within coastal sage scrub, maritime succulent scrub, and coastal sage-chaparral habitats, except where documented to the satisfaction of the City Manager that the thinning would be consistent with conditions of species coverage described in the City of San Diego's MSCP Subarea Plan.

Coastal California Gnatcatcher

Area specific management directives must 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. No cleaning of occupied habitat within the cities' MHPAs and within the County's Biological Resource Core Areas may occur between March 1 and August 15.

Edge effects and disturbance to this species would be reduced and minimized through compliance with the LUAG, as described above. A Fire Fuel Load Modeling Report (Appendix K) has been prepared for the project and contains fire protection measures, including a Brush Management Plan, to reduce the potential for habitat degradation. In addition, since the project impact footprint would not overlap with the City's MHPA, no clearing of occupied habitat within the MHPA would occur as a result of the project's construction. Pursuant to San Diego Municipal Code Section 142.0412, brush management activities are prohibited within coastal sage scrub, maritime succulent scrub, and coastal sage-chaparral habitats, except where documented to the satisfaction of the City Manager that the thinning would be consistent with conditions of species coverage described in the City of San Diego's MSCP Subarea Plan.

Least Bell's Vireo

Area specific management directives must include measures to provide appropriate successional habitat, upland buffers for all known populations, cowbird control, and specific measures to protect against detrimental edge effects to this species. Any clearing of occupied habitat must occur between September 15 and March 15 (i.e., outside of the nesting period).

An upland buffer (referred to in this report as “wetland buffer”) of approximately 70 to 78 feet would remain between the project impact footprint and adjacent suitable habitat for least Bell’s vireo. Focused surveys were negative for this species in 2018 (Appendix D) and there are no known CNDDB or USFWS occurrences within the project vicinity. However, this species is assumed potentially present since there is suitable riparian habitat in the project study area (Figure 5.4-1a). Note, the focused surveys are more than 24 months old as of the date of this report; therefore, they cannot be used as an accurate record of the current presence or absence of the species. The project would implement appropriate avoidance measures, including pre-construction surveys, as previously discussed regardless of presence or absence. The project impact footprint has been sited outside of all riparian habitat within the project study area; therefore, no clearing of occupied habitat would occur as part of the project’s construction. Pursuant to San Diego Municipal Code Section 142.0412, brush management activities are prohibited within coastal sage scrub, maritime succulent scrub, and coastal sage-chaparral habitats, except where documented to the satisfaction of the City Manager that the thinning would be consistent with conditions of species coverage described in the City of San Diego’s MSCP Subarea Plan.

In addition, the off-site study area has been sited outside of all riparian habitat and no clearing of riparian habitat would occur. Southern cottonwood-willow riparian forest occurs immediately north of the off-site study area and is suitable nesting and foraging habitat for least Bell’s vireo. There is no wetland buffer at this location since no permanent structures or other project components are proposed.

Cooper’s Hawk

Area specific management directives must include 300-foot impact avoidance areas around the active nests, and minimization of disturbance in oak woodlands and oak riparian forests.

Avoidance and resource protection measures (**AM-BIO-1a-c**) would ensure that there are no nesting Cooper’s hawks present within 300 feet of active construction (i.e., clearing, grubbing, and/or grading). No impacts to oak woodlands or oak riparian forests would occur as part of the project.

Significance of Impact

Short-term construction activities could result in noise levels that could affect habitat occupied by breeding California gnatcatcher, least Bell’s vireo, or raptors including Cooper’s hawk resulting in a **potentially significant impact**.

Mitigation

Implementation of avoidance and resource protection measures (**AM-BIO-1a** and **AM-BIO-2**), and **MM-BIO-3**.

Significance of Impact after Mitigation

With implementation of avoidance and resource protection measures (**AM-BIO-1a** and **AM-BIO-2**), and **MM-BIO-3**, the project would avoid adverse effects of excessive noise on sensitive species during the breeding season in compliance with the LUAG.

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?*

Threshold

In accordance with the City's Significance Determination Thresholds (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

The project would comply with the City's ESL Regulations and Biology Guidelines, as discussed above under Issues 1 through 6. In addition, the project would be consistent with applicable plans and policies. Refer to Section 5.1, Land Use, for further detail.

Significance of Impact

Impacts resulting from a conflict with any local policies or ordinances protecting biological resources would not occur because the project would be consistent with the City's ESL Regulations and Biology Guidelines. **No impact** would occur.

Mitigation

No mitigation would be required.

5.4.3.7 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?*

Threshold

In accordance with the City's Significance Determination Thresholds (2022), the project would have a significant impact if it would:

- Introduce invasive species of plants into natural open space area.

Impact

The project would incorporate landscaping and a Zone 1 Defensible Space that would be lightly vegetated with a non-habitat forming, native species palette. All plant species installed within 100 feet of the MHPA shall comply with the City's Landscape Regulations (LDC142.0400 and per table 142-04F, Revegetation and Irrigation Requirements) and be non-invasive. The proposed landscape plan was reviewed to confirm no invasive plant species (as listed by the California Invasive Plant Council [Cal-IPC Inventory] are included.

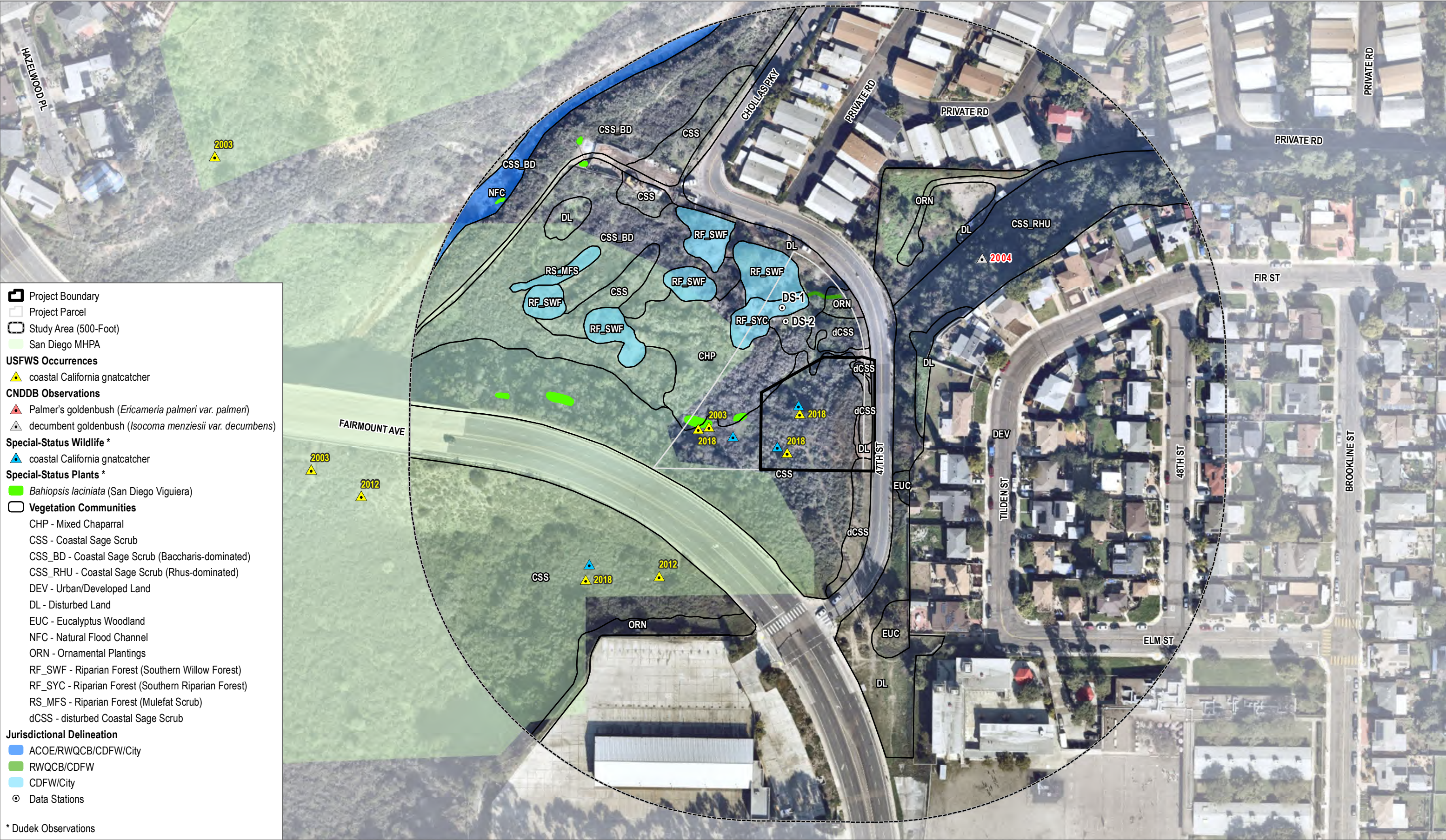
Significance of Impact

The project would not result in impacts related to the introduction of invasive plant species to natural open space area. **No impact** would occur.

Mitigation

No mitigation would be required.

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SOURCE: RRM Design Group 2024; USFWS 2020; SANGIS 2023, 2024

FIGURE 5.4-1a
On-Site Biological Resources
Fairmount Avenue Fire Station

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SOURCE: RRM Design Group 2024; USFWS 2020; SANGIS 2023, 2024

FIGURE 5.4-1b

Off-Site Construction Staging Area Biological Resources

Fairmount Avenue Fire Station

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SOURCE: RRM Design Group 2024; USFWS 2020; SANGIS 2023, 2024

FIGURE 5.4-2a
On-Site Project Impacts
Fairmount Avenue Fire Station

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SOURCE: RRMDesign Group 2024; USFWS 2020; SANGIS 2023, 2024

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5.5 ENERGY

This section describes the existing energy production/consumption conditions of the proposed Fairmount Avenue Fire Station (project), identifies the associated regulatory framework, evaluates potential impacts, and identifies mitigation measures, if applicable, related to implementation of the project.

The following discussion is consistent with and fulfills the intent of the CEQA Guidelines Appendix G and is based on information from the Air Quality and Greenhouse Gas Emissions Technical Report prepared by Dudek (Appendix C) and information the California Energy Commission (CEC), California Public Utilities Commission (CPUC), CARB, and U.S. EPA.

5.5.1 EXISTING CONDITIONS

Physical Conditions

The project site is undeveloped vacant land, located in the City of San Diego (City), which is within the central portion of San Diego County. Refer to Chapter 2, Environmental Setting, for additional details regarding the site conditions and surrounding community features.

Site Planning

The project site is designated Industrial Employment in the City's General Plan and zoned Open Space (OP-2-1) and Residential-Single Unit (RS-1-7) in the City's Zoning Code (City of San Diego 2024a). The project site is currently designated as Industrial in the Mid-City Communities Plan. The proposed off-site improvements would be within the 47th Street right-of-way and also within a temporary construction staging area located approximately 0.4 miles southwest of the site. Overall, the site is designated for industrial uses while the zoning indicates the site is planned for open space or residential uses.

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. The project site is undeveloped so does not consume electricity, natural gas or require petroleum.

Electricity

According to the U.S. Energy Information Administration, California used approximately 251,869 gigawatt hours (GWh) of electricity in 2022 (EIA 2023a). 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 consumes more electricity than all other states except Texas and Florida, yet it uses less per capita than any other state, but Hawaii (EIA 2023a).

San Diego Gas and Electric Company (SDG&E) provides electric services to 3.6 million customers through 1.4 million electric meters located in a 4,100-square-mile service area that includes San Diego County (County) and southern Orange County (SDG&E 2024).

According to the 2022 SDG&E Power Content Label, eligible renewable energy accounts for 44.8% of SDG&E's overall energy resources, with biomass and biowaste at 2.9%, solar power at 28.0%, and wind power at 13.9% (SDG&E 2023). Natural gas accounts for 54.4%, and unspecified power accounts for 0.8% of SDG&E's energy resources. Within the County, annual electricity use in 2022 was approximately 20,243 GWh per year (CEC 2024a).

Natural Gas

According to the U.S. Energy Information Administration (EIA), California used approximately 2,056,267 million cubic feet of natural gas in 2022 (EIA 2023b). The majority of California's natural gas customers are residential and small commercial customers (core customers). These customers account for approximately 35% of the natural gas delivered by California utilities (CPUC 2024). Large consumers, such as electric generators and industrial customers (noncore customers), account for approximately 65% of the natural gas delivered by California utilities (CPUC 2024).

SDG&E provides the county with natural gas service. SDG&E distributes energy services to 3.7 million people through 905,000 natural gas meters in San Diego and southern Orange counties. Within the county, annual natural gas use was approximately 522 million therms in 2022 (CEC 2024b).

Petroleum

According to the EIA, California used approximately 628 million barrels of petroleum in 2022, with the majority (534 million barrels) used for the transportation sector (EIA 2023c). There are 42 U.S. gallons in a barrel, so this equates to a total daily use of approximately 15 million barrels of petroleum among all sectors and 13 million gallons for the transportation sector. Petroleum usage in the state 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 VMT. Section 5.5.2 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 use of other energy resources or alternative transportation modes increasingly feasible.

5.5.2 REGULATORY FRAMEWORK

Please see Appendix C for a detailed overview of all federal and state regulations adopted to reduce GHG emissions and energy consumption. The following summarizes regulations applicable to the project.

Federal

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, this federal legislation requires ever-increasing levels of renewable fuels (the RFS) to replace petroleum (EPA 2025). The 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 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 keyways 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 (RFS2) 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 the U.S. Environmental Protection Agency 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 (environmentally beneficial) jobs.

State

California Code of Regulations, Title 24, Part 6

The California Building Standards Code 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 established 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 3 years by the Building Standards Commission and California Energy Commission (CEC) and revised if necessary (California Public Resources Code [PRC] Section 25402[b][1]). The regulations receive input from members of industry, as well as the public, to "reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (California PRC Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (California PRC Section 25402[d]) and cost effectiveness (California PRC Section 25402[b][2–3]). 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 current Title 24, Part 6 standards, referred to as the 2022 Title 24 Building Energy Efficiency Standards, became effective on January 1, 2023. The 2022 energy code focuses on four key areas in newly constructed homes and businesses quality (CEC 2021):

- Encouraging electric heat pump technology for space and water heating, which consumes less energy and produces fewer emissions than gas-powered units.
- Establishing electric-ready requirements for single-family homes to position owners to use cleaner electric heating, cooking, and EV charging options whenever they choose to adopt those technologies.
- Expanding solar photovoltaic (PV) system and battery storage standards to make clean energy available on site and complement the state's progress toward a 100% clean electricity grid.
- Strengthening ventilation standards to improve indoor air quality.

If approved, the 2025 Title 24 Standards would be effective on January 1, 2026. The 2025 Draft Energy Code introduces new areas compared to the 2022 Title 24 standards, including a stronger emphasis on electric heat pumps for space and water heating in new buildings. It also establishes electric-ready requirements for commercial kitchens and some multifamily buildings, mandates the replacement of end-of-life rooftop HVAC units with high-efficiency systems, and updates solar and storage standards for assembly buildings (CEC 2024c).

California Code of Regulations, Title 24, Part 11

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 (Part 11 of Title 24), which is 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 and schools and hospitals.

The 2022 CALGreen standards are the current applicable standards. For nonresidential projects, some of the key mandatory CALGreen standards involve requirements related to bicycle parking, designated parking for clean air vehicles, electric vehicle (EV) charging stations for passenger vehicles, shade trees, water conserving plumbing fixtures and fittings, outdoor potable water use in landscaped areas, recycled water supply systems, construction waste management, excavated soil and land clearing debris, and commissioning (24 CCR, Part 11).

California Code of Regulations, Title 20

Title 20 of the CCR requires manufacturers of appliances to meet state and federal standards for energy and water efficiency (20 CCR 1401–1410). The CEC certifies an appliance based on a manufacturer's demonstration that the appliance meets the 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; 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 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.

Local***SDG&E Individual Integrated Resource Plan***

SDG&E's Conforming Portfolio identifies a need for approximately 700 GWh 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 Renewable Portfolio Standard (RPS) targets—in 2018, approximately 45% of its energy mix came from delivering renewable resources (compared to an RPS requirement of 29%), 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 49% renewable energy in 2021, 98% of which would be from long-term contracts (SDG&E 2020).

City of San Diego General Plan

The following policies contained in the Conservation Element of the City's General Plan (City of San Diego 2024b) are 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.
- CE-A.6.** Design new and major remodels to City buildings, and where feasible, long term building leases for City facilities, to achieve at a minimum, the Silver Rating goal identified by the Leadership in Energy and Environmental Design (LEED) Green Building Rating System to conserve resources, including but not limited to energy and renewable resources.

City of San Diego Climate Action Plan

The City adopted a 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 addressed GHG emissions from the built environment, energy use, and transportation, among others (City of San Diego 2022). The CAP 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

City of San Diego Sustainable Building Policy

The City Council adopted Council Policy 900-14, “Sustainable Building Policy,” on May 20, 2003 (City of San Diego 2003), and updated it in December 2024. This policy asserts the City’s commitment to green building practices in City facilities. The LEED (Leadership in Energy and Environmental Design) Green Building Rating System is a voluntary, consensus-based national standard for developing high-performance, sustainable buildings. This policy requires City projects to achieve the U.S. Green Building Council’s LEED “Silver” Level Certification for all new buildings and major renovations over 5,000 square feet. In addition to achieving LEED “Silver” Level Certification, Council Policy 900-14 encourages sustainable building measures for all newly constructed facilities and major renovation projects regardless of square footage. To achieve LEED Silver certification for a non-residential building, a project must earn between 50 to 59 points on the LEED rating system. Some key areas where points can be earned include reducing water use through efficient landscaping, using renewable energy, and using sustainable building materials. The project is proposing to meet LEED Silver certification building standards.

City of San Diego Zero Emissions Municipal Buildings & Operations Policy

In December 2024, the San Diego City Council adopted an update to Council Policy No. 900-03, the Zero Emissions Municipal Buildings & Operations Policy (ZEMBOP), which establishes an implementing framework to ensure the City leads by example in decarbonizing the municipal building sector and transitioning to a zero-emissions fleet by 2035. ZEMBOP applies to all municipal facilities and parking lots and is included in all new leases of City-owned property.

With the adoption of ZEMBOP, new construction projects will be required to be all-electric, 10% more efficient than the state code, and designed to include a solar or other renewable energy system plus a battery energy storage system large enough to cover the facility’s electricity load. All new construction projects shall be designed and operated with exclusively electric systems or appliances for space conditioning, water heating, cooking, and lighting, and without using any fossil fuel energy source for non-emergency electricity generation or any other non-emergency functions. All fleet parking spaces in associated parking lots must be EV Ready (i.e. wiring to the spaces), and staff and public spaces must meet CALGreen Tier 1 requirements for EV charging infrastructure.

5.5.3 IMPACTS 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?*

Threshold

To determine the significance of the proposed 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, in evaluating a project's effects on energy conservation in the preparation of Environmental Impact Reports, staff and consultants are directed to Appendix F of the CEQA Guidelines. For purposes of this EIR, guidance provided by checklist questions listed in Appendix G of the State CEQA Guidelines are used to evaluate the potential for significant impacts to occur. Would the project result in a significant impact to energy conservation if it would:

- Result in the wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Impact

Pursuant to the City's Guidelines and State CEQA Guidelines Appendix F, energy conservation impacts were analyzed by estimating project energy requirements by amount and fuel type for each stage of the project.

Electricity

Construction Use

Electricity is not expected to be consumed in large quantity during project construction, as construction equipment and vehicles are typically not electric, but rather diesel- or gas-powered. Temporary electric power for as-necessary lighting and electronic equipment, such as computers inside temporary construction trailers, would be provided by SDG&E. The electricity used for such activities would be temporary and would have a negligible contribution to the 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 operating a fire station.

CalEEMod (version 2022.1.1) was used to estimate project emissions from energy uses. Default electricity generation rates in CalEEMod were used based on compliance with the current version of Title 24 (2022). Based on the results of the CalEEMod estimates, the proposed project would consume approximately 472,807 kWh per year. This equates to approximately 0.47 GWh per year. For context, in 2022, the total electricity demand for San Diego County was 20,243 GWh (CEC 2024a).

As described above, the electricity demand calculation for the project assumes compliance with Title 24 standards for 2022. However, the project would be required to meet the California Building Energy Efficiency Standards (24 CCR 6) in effect at the time building permits are requested, which may be more stringent than the current 2022 standards. In addition, the project would be subject to statewide mandatory energy requirements, as outlined in Title 24, Part 6, of the CCR. For example, for non-residential buildings, Title 24 mandates cool roofs and low-flow water fixtures to help reduce water and energy consumption. Title 24, Part 11, contains voluntary energy measures that are applicable to the project under the state's CALGreen Code. 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.

Moreover, in accordance with the City's General Plan Conservation Element and the City Council Policy 900-14 "Sustainable Building Policy," the project would achieve LEED "Silver" Level Certification. Furthermore, the project would be all-electric per the City's ZEMBOP. In addition, the project would not conflict with the six strategies of the City's CAP, as discussed in Section 5.7, Greenhouse Gas Emissions. Specifically, the project would be consistent with the Decarbonization of the Built Environment and Access to Clean and Renewable Energy strategies by including all-electric development, EV charging stations, and solar-ready design.

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 have a negligible contribution to the proposed project's overall energy consumption.

Operational Use

In accordance with the City's ZEMBOP, the project would be all-electric. The project is estimated to have a total natural gas demand of 0 thousand British Thermal Units (kBtu) per year.

Petroleum

Construction Use

Petroleum would be consumed throughout construction of the project. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction, and VMT 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 on-road trucks are assumed to use diesel fuel. It is assumed that construction workers would travel to and from the project site in gasoline-powered vehicles.

Fuel consumption from construction was estimated by converting the total emissions from each construction phase to gallons using conversion factors for carbon dioxide (CO₂) to gallons of gasoline or diesel. The estimated diesel fuel usage from construction equipment, haul trucks, and vendor trucks, as well as estimated gasoline fuel usage from worker vehicles, is shown in Table 5.5-1.

**Table 5.5-1.
Project Construction Petroleum Demand Summary**

	Off-Road Equipment (Diesel)	Haul Trucks (Diesel)	Vendor Trucks (Diesel)	Worker Vehicles (Gasoline)
Year	<i>Gallons</i>			
2026	5,061	1,534	288	368
2027	19,194	5,460	1,201	1,714
2028	15,160	0	1,641	3,471
2029	5,508	0	556	1,235
Total Project Construction Petroleum	44,923	6,994	3,686	6,788

Source: Appendix C.

Note: The conversion factor for gasoline is 8.78 kilograms per metric ton of CO₂ per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton of CO₂ per gallon (The Climate Registry 2024).

In summary, project construction is anticipated to consume approximately 62,391 gallons of petroleum in total. Notably, the project would be subject to CARB's In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and (4) requires fleets to reduce their emissions by retiring, replacing, or

repowering older engines or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the Best Achievable Control Technology requirements. Project construction would represent a “single-event” petroleum demand and would not require on-going or permanent commitment of petroleum resources for this purpose. Overall, project construction would not involve activities or uses that require equipment that would be less energy-efficient than at comparable construction sites in the region or state. Therefore, impacts would be less than significant.

Operational Use

During operations, fuel consumption resulting from the project would involve the use of motor vehicles, including diesel fire trucks, fire station employee vehicles, and vendor trucks, traveling to and from the project site, and stationary sources (i.e., routine testing and maintenance of the diesel emergency generator). Fuel consumption from operation of the project was estimated by converting the total emissions from mobile sources and stationary sources to gallons using conversion factors for carbon dioxide (CO₂) to gallons of gasoline or diesel. Fuel demand estimates for project operation are provided in Table 5.5-2.

**Table 5.5-2.
Project Annual Operational Petroleum Demand Summary**

Land Use	Estimated Annual Fuel Consumption (Gallons)			
	<i>Gasoline (employees)</i>	<i>Diesel (Trucks)</i>	<i>Diesel (Generator)</i>	<i>Total</i>
Project (fire station)	4,855	27,393	2,387	34,635

Source: Appendix C.

As shown in Table 5.5-2, project operations would require an annual fuel demand of approximately 34,635 gallons of petroleum. Fuel would be provided by current and future commercial vendors. The project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips or associated excess and wasteful vehicle energy consumption, nor does it propose excessive or wasteful stationary source energy consumption.

In addition, the transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands in the future. Therefore, the project’s construction and operational energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Renewable Energy Potential

Given the project's location and the nature of the project, there are anticipated considerable site constraints at a parcel level including potential limited land availability, incompatibility with onsite and surrounding land uses for large scale power generation facilities, and no known water or geothermal resources to harness, that would eliminate the potential for biomass, geothermal, solar, and hydroelectric renewable energy to be installed within the project area. Regarding wind power, due to the developed nature of the project area parcels and surrounding land uses, wind turbines are generally anticipated to not be feasible as it represents an incompatible use due to the height of the wind turbine blades and the need to avoid nearby obstacles.¹ However, the project is proposing that the building would be equipped with solar ready design features that would facilitate and optimize the installation of a rooftop solar photovoltaic (PV) system, following construction of the building. PV installation would require separate approvals and permits not included in the proposed project.

In summary, the project would include solar-ready design but would likely not include any other onsite renewable energy sources due to site constraints. However, in accordance with the City's General Plan Conservation Element and the City Council Policy 900-14 "Sustainable Building Policy," the project would be required to achieve LEED "Silver" Level Certification, as well as adhere to the CalGreen Building Code standards which include provisions that mandate energy efficiency.

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, the electricity consumption of the project during operation would not be inefficient or wasteful, as the project would be designed to meet the California Building Energy Efficiency Standards (24 CCR 6) to meet applicable Title 24 requirements. The project would achieve LEED "Silver" Level Certification and would be consistent with the six strategies of the CAP, all of which would help to minimize the project's energy use. For the reasons described above, the electricity consumption of the proposed project would not be inefficient or wasteful. Impacts would be **less than significant**.

Natural Gas

Natural gas is not anticipated to be required during project construction. In accordance with the City's ZEMBOP, the project would be all-electric and would not use natural gas for operation. In addition, the City would ensure that the proposed project meets applicable Title 24 building

¹ A general rule of thumb is to install a wind turbine on a tower with the bottom of the rotor blades at least 30 feet above anything within a 500-foot horizontal radius and to be sited upwind of buildings and trees (APA 2011; NREL 2015).

requirements. The natural gas consumption of the proposed project would not be inefficient or wasteful and impacts would be **less than significant**.

Petroleum

Construction of the project would increase petroleum use for worker vehicles, vendor trucks, haul trucks, and off-road equipment. However, project construction would represent a “single-event” petroleum demand and would not require on-going or permanent commitment of petroleum resources for this purpose. Although the proposed project would increase petroleum use during operation as a result of employees, fire trucks, and vendor trucks traveling to and from the project site, as well as an emergency generator, the use would be a small fraction of the countywide use and due to energy 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. Impacts would be **less than significant**.

Mitigation

No mitigation would be required.

5.5.3.2 Issue 2: State or Local Plan for Renewable Energy or Energy Efficiency

Issue 2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Threshold

To determine the significance of the proposed 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, in evaluating a project’s effects on energy conservation in the preparation of Environmental Impact Reports, staff and consultants are directed to Appendix F of the CEQA Guidelines. For purposes of this EIR, guidance provided by checklist questions listed in Appendix G of the State CEQA Guidelines are used to evaluate the potential for significant impacts to occur. Would the project result in a significant impact to energy conservation if it would:

- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Impact

Pursuant to the City’s guidelines and State CEQA Guidelines Appendix F, energy conservation impacts were analyzed by evaluating project compliance with regulatory requirements and existing energy standards.

Title 24 of the CCR contains energy efficiency standards for 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 all 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 project under the CALGreen Code. As discussed above under the previous threshold, the project would result in a minimal increase in demand for electricity and petroleum relative to what is consumed countywide. The project would comply with all mandatory measures required by Title 24, Part 11, which would decrease the consumption of electricity and petroleum.

In accordance with the City's General Plan Conservation Element Policies CE-A.5 and CE-A.6 and City Council Policy 900-14 "Sustainable Building Policy," the project would attain LEED "Silver" Level Certification and would employ sustainable or "green" building techniques through all-electric development, in accordance with the City's ZEMBOP. Furthermore, the project would comply with the six strategies included in the CAP designed to reduce unnecessary consumption of energy.

Significance of Impact

The proposed project would comply with Title 24, Part 6 and Part 11, would be consistent with the City's General Plan Conservation Element policies pertaining to energy use, Council Policy 900-14, and the City's CAP elements pertaining to energy use. Therefore, the project would not conflict with existing energy standards and regulations, or with a state or local plan for renewable energy or energy efficiency and impacts would be **less than significant**.

Mitigation

No mitigation would be required.

5.6 GEOLOGIC CONDITIONS

This section describes the existing geological conditions on the proposed Fairmount Avenue Fire Station 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 geotechnical investigation and updated geotechnical investigation prepared by SCST, LLC, an Atlas Company (March 2019; February 2020) and included as Appendix E.1 and E.2. In addition, a letter providing responses to geotechnical issues provided by the City of San Diego (City) was prepared by Atlas Technical Consultants (formerly SCST), which is included as Appendix E.3 (August 2021).

5.6.1 EXISTING CONDITIONS

Regional Geology

The project site is located within the Peninsular Ranges Geomorphic Province of California, which stretches from the Los Angeles basin to the tip of Baja California. This province is characterized by a series of northwest-trending mountain ranges separated by roughly parallel fault zones and a coastal plain. The mountain ranges are underlain primarily by metamorphic rocks (i.e., rocks that have been altered from their original form due to being subjected to intense heat and pressures) that were intruded by rocks from deep beneath the earth's surface (i.e., the Southern California batholith), while the coastal plain is underlain by subsequently deposited marine and non-marine sedimentary formations.

The Peninsular Ranges Province is considered a seismically active area with numerous Holocene-active faults (i.e., faults that have demonstrated displacement within the last 11,700 years) located throughout the region.

Physical Conditions

Under existing conditions, the project site consists of sloping undeveloped land covered in vegetation. Outcrops of the San Diego Formation (see description below) are exposed on the eastern portion of the site, adjacent to 47th Street (Appendix E.1). Outcrops of very old paralic¹ deposits are observed south of the site, adjacent to 47th Street. The site generally slopes downward

¹ Deposits are laid down on the landward side of a coast, in shallow fresh water subject to marine invasions. Thus, marine and nonmarine sediments are interbedded and form paralic deposits.

towards the north and west. Site elevations range from 194 feet amsl in the southeast to 140 feet amsl in the northwest (Appendix F.2). Over 40% of the site has a slope gradient that exceeds 25%.

Soils and Geologic Conditions

According to the geotechnical investigation performed at the project site, which included exploring the subsurface through test pits and trenching, the project site is underlain by undocumented fill, alluvium, very old paralic deposits, and Plio-Pleistocene-age San Diego Formation (Appendix E.1).

Undocumented Fill/Alluvium

The geotechnical report considered the fill and alluvium together due to similarities in characteristics. The fill and alluvium were encountered at the ground surface in each of the test pits and extended to depths ranging from about 1 to 12 feet below the existing ground surface.

Very Old Paralic (Marine and Non-Marine) Deposits

Very old paralic deposits were encountered beneath the undocumented fill in one of the test pits located in the southeast corner of the site, which extended to the total depth explored of about 3 feet below ground surface and consisted of hardened sandy claystone.

San Diego Formation

The San Diego Formation was encountered beneath the fill in most of the test pits and extended to the maximum depths explored of about 3 to 12½ feet below the ground surface. The San Diego Formation consists of weakly to strongly cemented silty sandstone and clayey sandstone, as well as hardened sandy claystone.

Groundwater

During the field explorations of the geotechnical investigation, groundwater was not encountered in any of the test pits or trenches; however, water seepage was encountered in one test pit located at the northern area of the site outside of the proposed development area at a depth of approximately 5½ feet below ground surface (Appendix E.1). The groundwater table at the project site is expected to be at a depth that is below a depth that would influence planned construction activities (Appendix E.1). However, groundwater levels can fluctuate due to rainfall, irrigation, broken pipes, or changes in site drainage.

Geologic Hazards

City of San Diego Seismic Safety Map

Based on the City of San Diego 2008 Seismic Safety Study, the site is located in Hazard Category 12, 32, and 52 (Appendix E.1). Geologic Hazard Category 12 is defined as faults that are potentially active, inactive, presumed inactive, or activity unknown. Category 32 is defined as areas with a low liquefaction potential with fluctuating groundwater and minor drainages. Geologic Hazard Category 52 is defined as level or sloping areas with favorable geologic structure and low risk (Appendix E.1)

Faulting and Seismicity

The Southern California region is seismically active with numerous regional Holocene-active faults that are all capable of experiencing substantive seismic events that could affect areas for many miles. The closest known Holocene-active fault to the project site is the Newport-Inglewood Rose Canyon (Offshore) fault zone, located approximately 4½ miles west of the site (Appendix E.1). The estimated maximum earthquake magnitude (M_w) and peak ground acceleration (g) for the Newport-Inglewood/Rose Canyon Fault are 7.5 and $0.24g^2$, respectively. The closest mapped fault is an unnamed fault located across 47th Street, adjacent to the site (City of San Diego, 2008 as cited in Appendix E.1).

This unnamed fault is not known to have offset Holocene sediments, indicating it is not a Holocene-active fault. The State of California does not consider this fault to be active, and an Alquist-Priolo earthquake fault zone has not been established for the fault. In addition, no evidence of faulting was found in the fault trench investigation conducted on the site. Accordingly, and consistent with California guidelines, the unnamed fault is not a potential source of seismic shaking or ground rupture (Appendix E.1). The site is not located in an Alquist-Priolo earthquake fault zone.

Liquefaction

Liquefaction hazards generally occur when shallow (less than 50 feet below ground surface (bgs), saturated, loose, or generally fine sands and silts are subjected to strong ground shaking. The cohesionless soils lose shear strength and begin to behave more like a liquid than a solid during ground shaking; potentially resulting in large total and differential ground surface settlements, as well as possible lateral spreading (i.e., when liquefiable soils move as a block towards an open slope face) during an earthquake. However, primarily due to the relatively dense subsurface materials

² Peak ground accelerations (pga) are stated in terms of their relative “g” or gravitational forces. For reference, the 1994 Northridge earthquake produced pga values that approached 1.0g.

underlying the site and the lack of shallow groundwater, the potential for liquefaction and dynamic settlement to occur at the site was determined to be low (Appendix E.1).

Landslides

Landslides include many phenomena that involve the downslope displacement and movement of material, triggered either by static (i.e., gravity) or dynamic (i.e., earthquake) forces. Exposed rock slopes undergo rockfalls, rockslides, or rock avalanches, while soil slopes experience soil slumps, rapid debris flows, or deep-seated rotational slides. Slope stability can depend on a number of complex variables, including the underlying geology, structure, and amount of groundwater, as well as external processes such as climate, topography, slope geometry, and human activity. Landslides can occur on slopes of 15% or less, but the probability is greater on steeper slopes that exhibit old landslide features such as scarps, slanted vegetation, and transverse ridges. As noted above, the site is mapped by the City as being in an area that is considered to be either level or sloping terrain with favorable geologic structure such that the landslide hazard is considered low even though the topography includes slopes that are greater than 25% (Geologic Hazard Category 52) (City of San Diego 2008 and Appendix E.1). There are no confirmed, known, or highly suspected landslides mapped on the project site or vicinity (San Diego 2008). According to the geotechnical investigation, no evidence of landslides or slope instabilities were observed during field investigation at the site nor shown on any geologic maps reviewed (Appendix E.1).

Expansive Soils

Expansive soils are generally clay soils that experience volumetric changes with changes in moisture content that can lead to substantive damage to improvements over time from the cyclical changes. According to the geotechnical report, the existing soils at the project site are considered to have a range of expansive properties, with the sandy and gravelly layers generally expected to have a low expansion potential and the more clayey layers with higher potential (Appendix E.1).

Tsunamis, Seiches, and Flooding

Tsunamis consist of a series of long-period ocean waves generated by different sources such as underwater earthquakes, volcanic eruptions, or submersed slope failures. Associated potential impacts include coastal inundation and water- or debris-related structural damage. The project site is located approximately 3.5 miles from San Diego Bay, where the risk associated with inundation hazards due to tsunamis is very low (Appendix E.1).

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 site is not located immediately adjacent to any enclosed or semi-enclosed bodies of water, the risk associated with inundation hazards due to seiche is very low (Appendix E.1).

The project site does encroach on the 100-year and 500-year flood zones associated with the Chollas Creek. However, the location of the proposed fire station in the southeast portion of the site is outside of the 100-year flood zone (Appendix E.1).

5.6.2 REGULATORY FRAMEWORK

Federal

International Building Code

The International Building Code (IBC) 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 CGS 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, Section 2690 et seq.) directs CGS 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).

As of 2012, Seismic Hazard Zone Maps had been prepared for portions of populated areas of Southern California. The project site is not located on the Seismic Hazard Zone Maps prepared for Southern California (CGS 2020). As a result, the provisions of the Seismic Hazards Mapping Act would not apply to the proposed 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 2022 CBC became effective January 1, 2023, and is based on the 2021 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 7-22, 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 Chapter 14, Article 5, Division 18, Section 145.1803 and Appendix D of the City's 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. No building permits are issued for construction where the geotechnical investigation report establishes that the construction of buildings or structures would be unsafe due to geologic hazards.

Municipal Code Chapter 12, Land Development Reviews, Article 9, Division 1 details the review process for construction plans prior to commencement of construction or occupancy to determine compliance with applicable codes and regulations to safeguard public health, safety, and welfare.

Municipal Code Chapter 14, General Regulations, Article 2, Division 1, Grading Regulations, details the regulations that address slope stability, protection of property, and erosion control. For slope stability the following slope gradient requirements are defined:

- All constructed slopes shall be designed for proper stability considering both geological and soil properties.
- Cut and fill slopes not greater than 8 feet in height shall not exceed a gradient of 66% (1-½ horizontal feet to 1 vertical foot).
- Cut and fill slopes greater than 8 feet in height shall not exceed a gradient of 50% (2 horizontal feet to 1 vertical foot).
- Where extraordinary conditions exist to the extent that compliance with the standards of this Section would be infeasible, the City Engineer, or the Building Official pursuant to Section 129.0104(a)(15), may authorize cut and fill slopes on property not owned, controlled or maintained by the City to be steeper than those specified in Section 142.0133(b) and (c). All such slopes within or adjacent to a public right-of-way must be approved by the City Engineer. A determination that such steeper slopes are warranted shall be based upon the required geotechnical report that clearly demonstrates that the steeper slope will be stable and not endanger public health, safety, and welfare. Such slopes shall be revegetated in accordance with a plan prepared by a landscape architect authorized to prepare landscape plans by the California Business and Profession Code.

In addition to the regulatory standards listed above, City requirements related to geologic and geotechnical issues include compliance with San Diego Municipal Code Chapter 14 Article 2 Division 1 Grading regulations. The purpose of these regulations is to address slope stability, protection of property, erosion control, water quality, landform preservation, and paleontological resources preservation, and to protect the public health, safety, and welfare of persons, property, and the environment. The City also requires conformance with applicable elements of the City's Storm Water Standards Manual and related documents that are also effective at reducing erosion potential (San

Diego Municipal Code Chapter 4, Article 3, Division 3, Section 43.0301, et seq.), with stormwater standards discussed in more detail in Section 5.9, Hydrology, and Section 5.17, Water Quality, of this EIR.

City of San Diego General Plan

The Public Facilities, Services and Safety Element of the City General Plan (City of San Diego 2024) 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 IMPACTS ANALYSIS

5.6.3.1 Issue 1: Geologic Hazards such as Earthquakes, Landslides, Mudslides, Ground Failure

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

Threshold

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

Potential for Hazards from Earthquakes

Surface/Fault Rupture

As previously described in Section 5.6.1, Existing Conditions, the project site is not located within an Alquist-Priolo Fault Hazard Zone, and there are no known Holocene-active faults, as defined by CGS, that are located in close proximity to the project site. The nearest Holocene-active fault to the site is the Newport-Inglewood/Rose Canyon Fault site which is approximately 4.5 miles to the west. There is an unnamed fault strand that crosses 47th Street adjacent to the site; however, with no known Holocene displacement, this fault is considered to not be a potential source of ground rupture or seismic ground shaking. Therefore, the potential for surface fault rupture to expose people or structures to ground failure from fault rupture would be negligible and the impacts less than significant.

Ground Shaking

Southern California is considered one of the most seismically active regions in the United States, with numerous Holocene-active faults and a history of destructive earthquakes. While the project site is located approximately 100 miles west of the San Andreas Fault, the predominate earthquake hazard in the state, other regional faults such as the Elsinore, San Jacinto, Coronado Bank, San Diego Trough, San Clemente, and La Nación are also capable of causing ground shaking in the vicinity of the site. As noted above, the nearest known active fault to the site is the Newport–Inglewood Rose Canyon Fault Zone, which is located approximately 4.5 miles west of the site.

A site-specific probabilistic seismic hazard analysis was completed as part of the geotechnical investigation (Appendix E.1). The site-specific seismic hazard analysis calculated the expected earthquake ground shaking that could occur at the site during future seismic events. The project site is likely to be subjected to strong ground motion from seismic activity similar to that of the rest of the City and Southern California, due to the seismic activity of the region as a whole. If not designed appropriately, this level of expected ground shaking could cause substantive damage. However, compliance with the most current CBC and the seismic design criteria specifications of the geotechnical investigation would reduce exposure of people or structures to potential substantial adverse effects from seismic ground shaking. As such, potential impacts related to ground shaking would be less than significant.

Landslides

As discussed in Section 5.6.1, the project site is mapped by the City as having a favorable geologic structure such that the landslide hazard is considered low (Geologic Hazard Category 52) (San Diego 2008 and Appendix E.1). While the site does include gradients that are 25%, there are no confirmed, known, or highly suspected landslides mapped on the project site or vicinity (San Diego 2008). In addition, the geotechnical investigation observed no evidence of landslides or slope instabilities during the field investigation (Appendix XE1). The building is proposed in the southeast portion of the project site in an area that is flatter. However, the proposed grading and development of the project would alter the landform and constitute new loadings (new weight) that could destabilize slope integrity if not engineered appropriately. As noted above, the project would be designed in accordance with the latest CBC and Municipal Code requirements, which include site preparation (e.g., site grading, benched slopes, and use of retaining walls) and foundation design requirements to minimize potential risks associated with landslides. In the preliminary geotechnical report, the recommendations ensure the project would be designed in accordance with building code requirements including making permanent slopes no greater than a 2:1 (horizontal: vertical) gradient, benching fills into sloping ground steeper than 5:1 and providing drainage controls to minimize water flowing over the top of exposed slopes (Appendix E.1). As described in Chapter 3,

Project Description and depicted on Figures 3-1, Project Site Plan and 3-3a through 3-3d, Elevations, the fire station is designed to incorporate the existing site topography and minimize grading. Adherence to current building code requirements and incorporation of geotechnical engineering recommendations into final design plans that have received approval by the City's plan approval process would reduce potential impacts related to landslides to less than significant.

Liquefaction and Seismically Induced 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 (e.g., sandy or silty), relatively loose, and groundwater is encountered within 50 feet of the surface. Per the geotechnical investigation, the potential for liquefaction at the site is considered to be low due to the density of the underlying materials and the lack of near-surface groundwater (Appendix E.1). Potential impacts related to liquefaction and settlement would be less than significant.

Tsunamis and Seiches

As previously described, the project site is located approximately 3.5 miles inland and is not located near or downstream of any surface water bodies susceptible to tsunami or 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 which would be incorporated into final design specifications. Further, the proposed project would be required to comply with the requirements of the most current CBC, which would further reduce impacts related to geologic hazards. With the implementation of the recommendations and appropriate building design measures consistent with the 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

No mitigation would be required.

5.6.3.2 Issue 2: Wind or Water Erosion of Soils

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

Threshold

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

Potential erosion and sedimentation impacts would be temporarily increased during construction, through activities such as excavation, grading, and removal of surface stabilizing features (e.g., vegetation). 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 if not managed appropriately. In addition, the off-site transport of sediment can potentially result in effects on 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 5.17.

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 within the project site would be stabilized through the installation of structures/hardscape and drought-tolerant, naturalized landscaping.

Short-term erosion and sedimentation impacts would be addressed through conformance with applicable elements of the City's stormwater program and related National Pollutant Discharge Elimination System (NPDES) standards. Specifically, this would entail conformance with applicable City regulatory codes including Municipal Code Chapter 14, General Regulations, Article 2, Division 1, Grading Regulations, as well as the NPDES Construction General Permit. Pursuant to the discussion of construction-related water quality concerns in Section 5.17, this would entail implementing an approved stormwater pollution prevention plan (SWPPP) and related plans and best management practices (BMPs), including appropriate measures to address erosion and sedimentation during construction. Municipal Code Chapter 14, Article 2, Division 1 requires that all development be conducted to prevent erosion and stop sediment and pollutants from leaving the work site. The City would be responsible for implementing and maintaining temporary and permanent erosion, sedimentation, and water pollution control measures to the satisfaction of the City Manager,

whether or not such measures are a part of approved plans. These measures that are designed to protect water quality are ultimately effective in reducing erosion and loss of topsoil to ensure erosion would not be significant.

Significance of Impact

Based on implementation of appropriate erosion and sediment control BMPs as part of, and in conformance with, an approved SWPPP and related City and NPDES requirements, associated potential erosion and sedimentation impacts from implementation of the project would be **less than significant**.

Mitigation

No mitigation would be required.

5.6.3.3 Issue 3: Unstable Geologic Units or Soil

Issue 3: Would the proposal 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?

Threshold

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 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

As outlined in Section 5.6.1 and the geotechnical investigation (Appendix E.1), the project site is underlain by surficial deposits consisting of undocumented fill, alluvium, very old paralic (marine and non-marine) deposits, and the San Diego Formation. The potential for landslides was discussed above, and with adherence to building code requirements and inclusion of geotechnical engineering recommendations into final design plan specifications, this would reduce the potential for landslides to less than significant. As also noted above, the potential for liquefaction to occur on site is considered low because of soil and site characteristics which is also true of lateral spreading, a hazard related to liquefaction. The geotechnical report did identify undocumented fills and alluvium that are not adequate to support proposed improvements and, as a result, would be removed and replaced with engineered fill materials in accordance with building code requirements. Fill materials would be required to meet geotechnical engineering specifications consistent with building code

requirements and sufficiently compacted under the oversight of a state-licensed geotechnical engineer. Some of the surficial soils are considered expansive and would require replacement with engineered fills that have low expansion potential. The proposed project would be required to implement the recommendations included in a final design-level geotechnical report, which would include specific requirements that address all onsite hazards including landslides, subsidence, expansive soils, and collapse, which would reduce potential impacts resulting from unstable soils and minimize the potential for on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Additionally, the proposed project would not be approved or built without adequately demonstrating compliance with the CBC and applicable geologic hazards regulations as set by the City. As the project would be built in accordance with a final design-level geotechnical report prepared by a state-licensed geotechnical engineer consistent with CBC requirements, impacts related to unstable soils would be less than significant.

Significance of Impact

Through implementation of associated design/construction recommendations set forth in the project geotechnical investigation, and mandatory conformance with applicable regulatory/industry standard and codes, including the IBC/CBC and pertinent City criteria would reduce the risk of potential effects from geologic hazards to acceptable levels. Therefore, impacts would be **less than significant**.

Mitigation

No mitigation would be required.

5.7 GREENHOUSE GAS EMISSIONS

This section identifies potential impacts related to climate change and greenhouse gas (GHG) emissions due to implementation of the proposed Fairmount Avenue Fire Station Project (project), identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if applicable.

The following discussion is based on the air quality and greenhouse gas emissions technical report, prepared by Dudek (October 2024) and included as Appendix C.

5.7.1 EXISTING CONDITIONS

Please see Appendix C for a detailed overview of all existing conditions related to GHGs, including sources of GHG emissions and potential effects of climate change.

Physical Conditions

The project site is undeveloped vacant land, located in the City of San Diego (City), which is within the central portion of San Diego County. Please refer to Chapter 2, Environmental Setting, for additional details regarding the site conditions and surrounding community features. There are no existing sources of development or human activity that generate GHG emissions within the site. The off-site area includes the 47th Street right-of-way and a temporary construction staging area.

Site Planning

The project site is designated Industrial Employment in the City's General Plan and zoned Open Space (OP-2-1) and Residential-Single Unit (RS-1-7) in the City's Zoning Code (City of San Diego 2024a). The project site is designated Industrial in the Mid-City: Communities Plan, while the proposed off-site improvements would be within the 47th Street right-of-way and also within a temporary construction staging area located approximately 0.4 miles southwest of the site. The City's Climate Action Plan (CAP) was prepared to address to greenhouse gas emissions (GHG) and is based on the site's underlying land use designations and zoning, as discussed below.

Climate Change Overview

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended period of time (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 2024).

The greenhouse effect is the trapping and build-up of heat in the atmosphere (troposphere) near the Earth's surface. The greenhouse effect traps heat in the troposphere through a threefold process: 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 the 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.

Greenhouse Gases

A GHG is any gas that absorbs infrared radiation in the atmosphere. GHGs include, but are not limited to, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), ozone (O₃), water vapor, black carbon, aerosols, hydrofluorocarbons (HFCs), hydrochlorofluorocarbons (HCFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Some GHGs, such as CO₂, CH₄, and N₂O, occur naturally and are emitted to the atmosphere through natural processes and human activities. Of these gases, CO₂ and CH₄ are emitted in the greatest quantities from human activities. Manufactured GHGs, which have a much greater heat-absorption potential than CO₂, include fluorinated gases (e.g., HFCs, HCFCs, PFCs, and SF₆), 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 (e.g., affect cloud formation or albedo¹) (EPA 2024). The Intergovernmental Panel on Climate Change (IPCC) 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).

5.7.2 REGULATORY FRAMEWORK

Please see Appendix C for a detailed overview of all federal and state regulations adopted to reduce the creation of GHGs. The following summarizes regulations applicable to the project.

¹ The fraction of light a surface reflects.

Federal

Federal Vehicle Standards

In response to a Supreme Court ruling, the Bush administration issued Executive Order (EO) 13432 in 2007, directing the Environmental Protection Agency (EPA), Department of Transportation, and Department of Energy to reduce GHG emissions from vehicles by 2008. Subsequent regulations were established, including the National Highway Traffic Safety Administration's (NHTSA) 2009 rule for 2011 model year vehicles and joint EPA-NHTSA rules for 2012-2016. In 2010, President Obama directed further standards, leading to stringent GHG and fuel economy standards for 2017-2025 model years. Additional standards for medium- and heavy-duty trucks were set in 2011. In 2022, NHTSA set new fuel economy standards for 2026, aiming for 49 miles per gallon by increasing efficiency annually.

State

State Climate Change Targets

The state has taken a number of actions to address climate change. These include executive orders (EOs), legislation, and CARB plans and requirements.

EO 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.

AB 32. In furtherance of the goals established in EO S-3-05, the legislature enacted AB 32 (Núñez and Pavley). AB 32 provided initial direction on creating a comprehensive multiyear program to limit California's GHG emissions to 1990 levels by 2020 and initiate the transformations required to achieve the state's long-range climate objectives.

SB 32. SB 32 and AB 197 (enacted in 2016) are companion bills that set a new statewide GHG reduction target, make changes to CARB's membership, increase legislative oversight of CARB's climate change-based activities, and expand 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 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030.

AB 1279. The legislature enacted AB 1279, the California Climate Crisis Act, in September 2022. The bill declares the policy of the state to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter. Additionally, the bill requires that by 2045, statewide anthropogenic GHG emissions be reduced to at least 85% below 1990 levels. Although AB 1279 establishes an overall policy to achieve net zero GHG emissions as

soon as possible, but no later than 2045, recognizing the need to implement CO₂ removal and carbon capture, utilization, and storage technologies, the legislature established a specific target of 85% below 1990 levels by 2045 for anthropogenic GHG emissions. Therefore, the net zero target does not directly apply to development projects, but the 2045 target of 85% below 1990 levels represents the reductions required to contribute to accomplishing the state's overall net zero policy.

CARB's Climate Change Scoping Plan

One specific requirement of AB 32 was for CARB to prepare a scoping plan for achieving the maximum technologically feasible and cost-effective GHG emission reductions by 2020 (Health and Safety Code Section 38561[a]), and to update the plan at least once every 5 years. In 2008, CARB approved the first scoping plan. Since 2008, the Scoping Plan has been updated, identifying new, technologically feasible and cost-effective strategies that will serve as the framework to achieve the 2030 GHG target as established by SB 32 and define the state's climate change priorities to 2030 and beyond.

The 2022 Scoping Plan outlines the state's plan to reach carbon neutrality by 2045 or earlier, while also assessing the progress the state is making toward reducing GHG emissions by at least 40% below 1990 levels by 2030, as is required by SB 32. The carbon neutrality goal requires CARB to expand proposed actions from only the reduction of anthropogenic sources of GHG emissions to also include those that capture and store carbon (e.g., through natural and working lands, or mechanical technologies). The carbon reduction programs build on and accelerate those currently in place, including moving to zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. The 2022 Scoping Plan also emphasizes that there is no realistic path to carbon neutrality without carbon removal and sequestration, and to achieve the state's carbon neutrality goal, carbon reduction programs must be supplemented by strategies to remove and sequester carbon (CARB 2022).

Title 24, Part 6 of the California Code of Regulations

Title 24 of the CCR was established in 1978 and serves to enhance and regulate California's building standards. Although not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically established building energy efficiency standards that are designed to ensure new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. The Building Standards Commission and California Energy Commission (CEC) review these energy efficiency standards every few years and revise them if necessary (California Public Resources Code [PRC] Section 25402[b][1]). The regulations receive input from members of industry and the public, with the goal of "reducing of wasteful, uneconomic, inefficient, or unnecessary

consumption of energy” (California PRC Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (California PRC Section 25402[d]) and cost effectiveness (California PRC Sections 25402[b][2] and [b][3]). 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 2022 Title 24 standards are the currently applicable building energy efficiency standards and became effective on January 1, 2023. The 2022 Title 24 standards improve upon the 2019 standards for new construction of, and additions and alterations to, residential and nonresidential buildings.

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 (Part 11 of Title 24) is commonly referred to as CALGreen and 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. The CALGreen 2022 standards, which are the current standards, became effective January 1, 2023.

Title 20 of the California Code of Regulations

Title 20 of the CCR requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. Performance of appliances must be certified through the CEC to demonstrate compliance with standards.

State Vehicle Standards (Assembly Bill 1493 and Executive Order B-16-12)

AB 1493 (July 2002) was enacted in response to the transportation sector accounting for more than one-half of California’s CO₂ emissions. AB 1493 required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by the state board to be vehicles that are primarily used for noncommercial personal transportation in the state. AB 1493 required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. CARB adopted the standards in September 2004. EO B-16-12 (March 2012) required that state entities under the governor’s direction and control support and facilitate the rapid commercialization of zero-emissions vehicles. It ordered CARB, CEC, the California Public Utilities Commission, and other relevant agencies to work with the Plug-In Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to help achieve goals by 2015, 2020, and 2025. On a statewide basis, EO B-16-12 established a target reduction of GHG emissions from the transportation sector equaling 80% less than 1990 levels by 2050. This directive

did not apply to vehicles that have special performance requirements necessary for the protection of the public safety and welfare.

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.

Senate Bill 97

SB 97 (Dutton) (August 2007) amends the CEQA statute to add Section 21083.05 and repeal Section 21097 of the Public Resources Code, and requires the development of and transmission to the Resources Agency guidelines for the feasible mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions.

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 emissions threshold, instead allowing a lead agency to develop, adopt, and apply its own thresholds of significance or those developed by other agencies or experts. CNRA also acknowledged 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 2009).

With respect to GHG emissions, the CEQA Guidelines state in Section 15064.4(a) 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: the extent a project may increase or reduce GHG

emissions as compared to the existing environmental setting; whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4[b]).

Local

San Diego Association of Governments

Regional Transportation/Sustainable Communities Strategy

The passage of SB 375 requires Metropolitan Planning Organizations (MPOs) to prepare an SCS in their RTP. SANDAG serves as the MPO for the San Diego region and is responsible for developing and adopting a SCS that integrates transportation, land use, and housing to meet GHG reduction targets set by CARB. The most recent, San Diego Forward: The 2021 Regional Plan, was adopted in 2021 and provides guidance on meeting or exceed GHG targets through implementation of five key transportation strategies. Through these strategies, the 2021 Regional Plan is projected to reduce per capita GHG emissions from cars and light-duty trucks to 20% below 2005 levels by 2035, exceeding the regions state-mandated target of 19% (SANDAG 2021).

City of San Diego

General Plan

The City of San Diego General Plan was adopted in March 2008 and amended in 2024. The City's General Plan includes various goals and policies in the Conservation Element related to directly and indirectly reducing GHG emissions (City of San Diego 2024b). Applicable policies include the following:

- CE-A.2.** Reduce the City's carbon footprint. Develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth in the General Plan.
- CE-A.5.** Employ sustainable or "green" building techniques for the construction and operation of buildings.
- CE-A.6.** Design new and major remodels to City buildings, and where feasible, long term building leases for City facilities, to achieve at a minimum, the Silver Rating goal identified by the Leadership in Energy and Environmental Design (LEED) Green Building Rating System to conserve resources, including but not limited to energy and renewable resources.

City of San Diego Municipal Code

Construction and Demolition Debris Diversion Deposit Program

SDMC Sections 66.0601–66.0610 outline the Construction and Demolition (C&D) Debris Diversion Deposit Program. This program is designed to encourage the recycling and reuse of materials generated during construction and demolition projects. The program sets specific diversion goals, requiring a significant portion of the debris to be recycled or reused instead of being disposed of in landfills.

Land Development Manual: Landscape Standards

SDMC Section 142.0402, Land Development Manual: 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. Additionally, the Landscape Standards provide the technical standards to create and maintain landscapes that conserve and efficiently use water.

The “Whitebook”

The City’s Standard Specifications for Public Works Construction (also known as the “Whitebook”) has been used to establish the uniformity of plans and specifications accepted and used by those involved in public works construction. The Whitebook provides general provisions on construction materials and construction methods for ECP projects and waste diversion (City of San Diego 2021).

Climate Action Plan

The City adopted a CAP in 2015 and most recently completed an update in 2022 (City of San Diego 2022a). The 2022 CAP establishes a communitywide goal of net zero GHG emissions by 2035, committing San Diego to an accelerated trajectory for GHG emissions. 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 serves as a qualified GHG reduction plan for purposes of tiering under CEQA as set forth in CEQA Guidelines Section 15183.5. The CAP 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 CAP sets the target GHG 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 of 63.3% below 1990 levels, which is far stricter than the SB 32 target of 40% below 1990 levels by 2030.

CAP Consistency Regulations and CAP Consistency for Plan- and Policy-Level Documents and Public Infrastructure Projects

On August 2, 2022, the City updated its GHG threshold, which included a project's compliance with CAP Consistency Regulations as the new GHG threshold upon the applicable effective date of Ordinance O-21528 implementing the CAP Consistency Regulations. Ordinance O-21528 provides amendments to the San Diego Municipal Code to ensure that all new development is consistent with the CAP Consistency Regulations and will collectively achieve the specified GHG emission reduction targets of the CAP. 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).

For public infrastructure projects and for plan- and policy-level environmental documents, the City provides alternative guidance for how to demonstrate compliance with the CAP, as described in "Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects" (City of San Diego 2025).

City of San Diego Sustainable Building Policy

Council Policy 900-14, "Sustainable Building Policy," (City of San Diego 2024) asserts the City's commitment to green building practices in City facilities. The LEED (Leadership in Energy and Environmental Design) Green Building Rating System is a voluntary, consensus-based national standard for developing high-performance, sustainable buildings. This policy requires City projects to achieve the U.S. Green Building Council's LEED "Silver" Level Certification for all new buildings and major renovations over 5,000 square feet. In addition to achieving LEED "Silver" Level Certification, Council Policy 900-14 encourages sustainable building measures for all newly constructed facilities and major renovation projects regardless of square footage.

City of San Diego Zero Emissions Municipal Buildings & Operations Policy

In December 2024, the San Diego City Council adopted an update to Council Policy No. 900-03, the Zero Emissions Municipal Buildings & Operations Policy (ZEMBOP), which establishes an implementing framework to ensure the City leads by example in decarbonizing the municipal building sector and transitioning to a zero-emissions fleet by 2035. ZEMBOP applies to all municipal facilities and parking lots and is included in all new leases of City-owned property.

With the adoption of ZEMBOP, new construction projects will be required to be all-electric, 10% more efficient than the state code, and designed to include a solar or other renewable energy system plus a battery energy storage system large enough to cover the facility's electricity load. All new construction projects shall be designed and operated with exclusively electric systems or appliances for space conditioning, water heating, cooking, and lighting, and without using any fossil fuel energy source for non-emergency electricity generation or any other non-emergency functions. All fleet parking spaces in associated parking lots must be EV Ready (i.e. wiring to the spaces), and staff and public spaces must meet CALGreen Tier 1 requirements for EV charging infrastructure.

5.7.3 IMPACTS ANALYSIS

5.7.3.1 Issue 1: 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?*

Threshold

To determine the significance of the proposed project's impact on the environment, the City's CEQA Significance Determination Thresholds (City of San Diego 2022c) were used. The method for determining significance depends on whether the action requires plan- or policy-level or project-level environmental analysis.

- For plan- and policy-level environmental documents, as well as environmental documents for public infrastructure projects, the Planning Department has prepared a Memorandum, Climate Action Plan Consistency for Plan- and Policy-Level Documents and Public Infrastructure Projects, to provide guidance on significance determination as it relates to consistency with the strategies in the Climate Action Plan.

As the project is a public infrastructure project, the project's significance is evaluated per the Memorandum, Climate Action Plan Consistency for Plan- and Policy-Level Documents and Public Infrastructure Projects (City of San Diego 2025).

Impact

Pursuant to the City's Memorandum, Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects (City of San Diego 2025), the environmental analysis should include a discussion of the project's potential to conflict with each of the six strategies of the CAP. The CAP's six strategies were developed to reduce citywide GHG emissions and achieve the GHG reduction targets identified in the CAP. The project's overall consistency and potential to conflict with these strategies is discussed below.

Strategy 1: Decarbonization of the Built Environment

This strategy aims to avoid GHG emissions from buildings across the city and improve indoor air quality. It includes measures to address emissions from existing buildings, municipal facilities, and new development.

As a new City municipal building greater than 5,000 SF, the project would be required to achieve the U.S. Green Building Council's LEED Silver Certification per the City's Sustainable Building Policy. In addition, consistent with the City's ZEMBOP, the project would be all-electric. Furthermore, the project would provide two electric vehicle parking spaces. Therefore, the project would support and would not conflict with the City's goals to decarbonize the built environment.

Strategy 2: Access to Clean and Renewable Energy

This strategy maintains the City's commitment to 100% renewable energy through San Diego Community Power, sets targets for converting the City's fleet of vehicles to electric, and aims to increase the number of electric vehicles used by our communities. As described in Strategy 1, the project would provide two electric vehicle parking spaces. In addition, the proposed building would be equipped with solar ready design features that would facilitate and optimize the installation of a rooftop solar photovoltaic (PV) system, following construction of the building. The project would not conflict with the City's ability to implement this strategy.

Strategy 3: Mobility and Land Use

This strategy focuses on emissions from transportation and includes actions that support mode shift through mobility and land use actions and policies.

The project site remains undeveloped, serving as natural open space dominated by native and non-native vegetation. The project would develop a public service facility, specifically a fire station, which is a use permitted in any land use designation. If necessary, temporary lane closures on roadways would not result in a permanent change to the Level of Service of the surrounding transportation system and would not impact any public transit facilities. The project would not conflict with or impede implementation of a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. In addition, the project would involve designing and implementing a safe and interconnected pedestrian route for the project site and surrounding area. Frontage improvements, including a sidewalk, would be constructed along the project's 47th Street boundary, and a crosswalk would connect the site to the existing sidewalk across the street. The project would not involve any change or modification to existing bike facilities and transit service in the area. While Strategy 3 is not directly applicable to the project, the project would not conflict with the applicable CAP goals and strategies identified in Strategy 3.

Strategy 4: Circular Economy and Clean Communities

This strategy maintains a 90% waste diversion rate, as well as CH₄ capture from landfill and wastewater treatment facilities. It also includes actions to increase healthy food access and food recovery.

The project includes the requirement for the construction contractor to comply with the latest edition of the City's Whitebook standards. It is assumed the project would comply with SDMC Sections 66.0601–66.0610 (the City's Construction and Demolition Debris Diversion Deposit Program) to reduce construction waste. Therefore, the project would not conflict with the applicable CAP goals and strategies identified in Strategy 4.

Strategy 5: Resilient Infrastructure and Healthy Ecosystems

This strategy will help the City thrive in the face of impacts attributed to climate change through a greater focus on the greening of the City, starting with Communities of Concern. It also includes targets for the restoration of salt marshland for carbon sequestration and increasing local water supply through Pure Water San Diego.

Due to the type of project, this strategy is not directly applicable. However, the project includes a landscaping plan adapted to the site consistent with the landscaping requirements set forth in SDMC Section 142.0402, Land Development Manual, Landscape Standards, and other applicable City and regional standards for landscape installation and maintenance. The project is a fire station that would increase fire protection throughout the community, thereby supporting resilient infrastructure. The project would not conflict with the applicable CAP goals and strategies identified in Strategy 5.

Strategy 6: Emerging Climate Actions

Strategy 6 addresses GHG emissions that will remain after all identified measures and actions have been implemented, including implementation of emerging climate actions. Further action, new policies, technological innovation, partnerships, and research are all necessary components of emerging climate actions that are beyond the ability of the CAP to quantify and assess.

The project would indirectly support broad goals and strategies of the CAP by providing a necessary public service. Project operation would implement emerging technologies to reduce GHGs using more-efficient vehicles and maintenance methods. While Strategy 6 is not directly applicable to the project, the project does not include any features that would conflict with the City's action to implement Strategy 6.

Conclusion

The project would be consistent with and would not conflict with the applicable strategies of the City's CAP. Therefore, the project would not generate GHG emissions that would have a significant impact on the environment.

Significance of Impact

The anticipated project-generated GHG emissions would not directly or indirectly conflict with the City's CAP. Impacts would be **less than significant**.

5.7.3.2 Issue 2: Climate Action Plan Consistency

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?*

Threshold

To determine the significance of the proposed project's impact on the environment, the City's CEQA Significance Determination Thresholds (City of San Diego 2022c) were used. The method for determining significance depends on whether the action requires plan- or policy-level or project-level environmental analysis.

- For plan- and policy-level environmental documents, as well as environmental documents for public infrastructure projects, the Planning Department has prepared a Memorandum, Climate Action Plan Consistency for Plan- and Policy-Level Documents and Public Infrastructure Projects, to provide guidance on significance determination as it relates to consistency with the strategies in the Climate Action Plan.

As the project is a public infrastructure project, the project's significance is evaluated per the Memorandum, Climate Action Plan Consistency for Plan- and Policy-Level Documents and Public Infrastructure Projects (City of San Diego 2025).

Impact

As described above under Issue 1, the project would be consistent with and would not conflict with the applicable strategies of the City's CAP. As such, the project would not conflict with the City's CAP or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Furthermore, the project would not conflict with the City's General Plan Policies CE-A.2 and CE-A.5. As detailed in Issue 1, per the City's Sustainable Building Policy, the project would achieve the U.S.

Green Building Council's LEED Silver Certification, and per the City's ZEMBOP, the project would be all-electric. As such, the project would employ sustainable building techniques for the construction and operation of buildings, which would help reduce the City's carbon footprint. In addition, the project would not conflict with General Plan Policy CE-A.6, as the project would achieve the LEED Silver Rating.

Conclusion

The project would be consistent with and would not conflict with the applicable strategies of the City's CAP and the City's General Plan. Therefore, the project would not conflict with the City's CAP or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The project would have a less-than-significant impact.

Significance of Impact

The project would not conflict with the City's CAP or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, the impact that would be **less than significant**.

5.8 HEALTH AND SAFETY

This section describes the existing health and safety conditions of the proposed Fairmount Avenue Fire Station Project (project) site, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if applicable, related to implementation of the project.

5.8.1 EXISTING CONDITIONS

Current Physical Conditions

Currently, the project site is undeveloped and vacant, surrounded by residential developments, industrial uses, and open spaces. The site is primarily characterized by undeveloped land which gently slopes down to a flat basin bottom from the north, east, and south, with steep hillsides on the east side. A variety of native and non-native vegetation types is present on site.

The surrounding development consists of residential neighborhoods to the east and north, open spaces to the north and west, and an industrial area and a school situated to the south of the project site. Undeveloped land and open spaces are located to the north and west. The existing land uses in the vicinity of the project site are reflective of the surrounding suburban environment and include mobile home development to the north, northeast and single-family residential development to the east. Undeveloped open space lands are adjacent to the south and west intertwined with open space within a canyon to the west, providing a natural break in the developed landscape. South of the project site, along 47th Street, lies an array of industrial areas, encompassing a FedEx Shipping Center, Sanwood Fine Carpentry and Construction Inc., and Antonio's Metal Works along Federal Boulevard. Across 47th Street is Webster Elementary School, approximately 450 feet directly to the southeast. The area immediately north and west of the project site consists of an undeveloped canyon. The open space within this canyon serves as a recreational area for the community with trails along the arroyo. Sunshine Bernardini Field Park and the proposed off-site construction staging area (see Figure 3-6, Off-Site Construction Staging Area) are west of the project site.

The project site is within Review Area 2 of the ALUCP for the San Diego International Airport. As discussed in Section 5.18, Wildfire, the project site is immediately surrounded by a Very High Fire Hazard Severity Zone, including Fairmount Avenue, 47th Street, and adjacent development.

Site History

Based on a review of historic aerial photographs and topographic maps, the project site has remained undeveloped since 1953. Early disturbances were due to the construction of 47th Street, with surrounding residential and commercial development occurring by the 1960s. Grading and vegetation removal occurred sporadically, particularly near the intersection of Chollas Parkway and

47th Street, with significant changes between 1986 and 1996 due to nearby road expansions. By 2020, the site remained undeveloped with no historic structures present, aside from some cleared areas and utility poles (Appendix I, Cultural Resources Phase I Inventory Letter Report).

5.8.2 REGULATORY FRAMEWORK

Federal

Federal Hazardous Materials Transportation Law

The U.S. Department of Transportation regulates hazardous materials transportation under Title 49 of the Code of Federal Regulations (49 U.S.C. § 5101 et seq.). The Hazardous Materials Regulations (HMR), 49 CFR Parts 171-180, cover registration, hazardous materials classification, hazard communication, training and security, packaging requirements, and operational rules. The HMR apply to the transportation of hazardous materials in interstate, intrastate, and foreign commerce by aircraft, railcar, vessel, and motor vehicle. 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.

FAA Part 77

FAA Part 77 pertains to the Safe, Efficient Use, and Preservation of the Navigable Airspace. It requires individuals to file a notice for proposed construction or alteration that may affect navigable airspace, using FAA Form 7460-1. The regulations aim to identify potential aeronautical hazards and promote air safety. Projects that exceed established height limits typically require an evaluation by the Federal Aviation Administration (FAA) for obstruction under Part 77 regulations.

State

Cortese List

The provisions in Government Code Section 65962.5 are commonly referred to as the “Cortese List” after the Legislator who authored the legislation that enacted it. In 1992 when the law was enacted, the Cortese List was a planning document used by the state, local agencies, and developers to comply with CEQA requirements by providing information about the location of hazardous materials release sites. While Government Code Section 65962.5 makes reference to the preparation of a “list,” many changes have occurred related to web-based information access since 1992 and this information is now largely available on the websites of the responsible organizations. Government Code Section 65962.5(a) requires CalEPA to develop an updated Cortese List annually, at minimum. DTSC, Department of Health Services, State Water Resources Control Board, and the local

enforcement agency (as designated) are responsible for the information contained in the Cortese List.

California Accidental Release Prevention Program

The purpose of the CalARP program is to prevent accidental releases of substances that can cause serious harm to the public and the environment, and to minimize the damage if releases do occur. CalARP requires certain facilities (referred to as “stationary sources”) which handle, manufacture, use, or store any regulated substances above threshold quantities to take actions to proactively prevent and prepare for accidental releases. Facilities subject to CalARP requirements must submit a Risk Management Plan (RMP). An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance (as specified in Tables 1-3, CCR, Title 19 Section 5130.6) in a process is required to submit an RMP. The proposed fire station would not handle quantities of chemicals that exceed regulatory thresholds and is not subject to the CalARP Program.

Title 22 of the California Code of Regulations

Title 22, California Code of Regulations (CCR) (Div. 4.5, Environmental Health Standards for the Management of Hazardous Waste) details the regulatory requirements for the implementation of hazardous waste management statutes contained in the Health and Safety Code.

Resource Conservation and Recovery Act and Hazardous Waste Control Law

The Resource Conservation and Recovery Act (RCRA) defines hazardous wastes and provides guidelines for their management from their creation to ultimate disposal (cradle to grave). RCRA regulates the generation, transportation, treatment, and disposal of those wastes it defines as hazardous. Hazardous Waste Control Law (HWCL), (1972) is California’s statute regulating the management of hazardous waste. Health and Safety Code, Division 20, Chapter 6.5 (HSC § 25100 et seq) HWCL sets forth definitions of hazardous wastes and procedures for their safe handling, transportation, treatment and disposal. Although RCRA and HWCL, and their respective implementing regulations are similar, not all the requirements for various permitting activities are identical. DTSC policy is to follow the most stringent or comprehensive requirements.

The Tanner Act

(HSC § 25199), also known as the Tanner Act (AB 2948, 1986), requires counties to prepare, for DTSC approval, hazardous waste management plans. These plans must estimate the volume and type of hazardous waste produced within the county, identify the capacity to treat and dispose of these wastes and establish siting criteria for hazardous waste treatment, storage and disposal (TSD) facilities.

California Occupational Safety and Health Administration

The State of California Department of Industrial Relations, Division of Occupational Safety and Health is also known as Cal/OSHA. 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.

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 ASTs and USTs, and medical and hazardous materials and waste.

The County of San Diego regulates any City property that stores hazardous materials in amounts at or above 55 gallons. All current Fire Stations have existing Hazardous Materials Business Plans (HMBP) and corresponding Unified Program Facility Permits (i.e., County permits to store hazardous materials). The Fairmount Ave Fire Station will have a 1,000-gallon aboveground fuel storage tank, and therefore will be subject to HMBP regulations and subject to routine audits by the County.

The Hazardous Waste Establishment division of the SDMC (Chapter 4, Article 2, Division 8) enables the Health Officer (i.e., Director of the County of San Diego DEHQ) 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 proposed fire station requires the use of hazardous materials that could result in hazardous waste.

Multi-Jurisdictional Hazard Mitigation Plan

The City is a participating jurisdiction in the San Diego County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP), a County-wide plan to identify risks and minimize damage from natural and man-made disasters (County of San Diego 2023). The primary goals of the MJHMP 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 federal Disaster Mitigation Act of 2000 requires all local governments to create such a disaster plan in order to qualify for hazard mitigation funding. The City of San Diego's 2023 MJHMP identifies planning area and resources, identifies the planning team and process, reviews community capabilities, conducts a risk assessment, and develops a risk mitigation strategy. Hazards profiled in the plan include wildfire, structure fire, flood, drought, extreme heat, and earthquakes.

County of San Diego Office of Emergency Services

The Unified Disaster Council (UDC) is the governing body of the Unified San Diego County Emergency Services Organization. The Council is comprised of the San Diego County Board of Supervisors, who serves as Chair of the Council, and representatives from the 18 incorporated cities. The County of San Diego Office of Emergency Services (OES) serves as staff to the UDC. In this capacity, OES is a liaison between the incorporated cities, the California Governor's Office of Emergency Services and the Federal Emergency Management Agency, as well as non-governmental agencies such as the American Red Cross.

The San Diego County Operational Area (OA) was formed in the 1960's to assist all of the cities and the County in developing emergency plans, exercising those plans, developing Mutual Aid capabilities between jurisdictions and, in general, establishing relationships that would improve communications between jurisdictions and agencies. The OA consists of the County and all jurisdictions within the county.

The Operational Area (OA) Emergency Operations Plan (EOP) is for use by the County and all of the cities within the county to respond to major emergencies and disasters. It describes the roles and responsibilities of all county departments (including many city departments), and the relationship between the County and its departments and the jurisdictions within the county. The Cities are encouraged to adopt the OA EOP as their own, with modifications as appropriate for their city. The Plan is subject to update every four years by the Office of Emergency Services (OES) and the Unified Disaster Council (UDC) of the Unified San Diego County Emergency Services Organization.

San Diego Office of Homeland Security

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 multidepartment and City-wide emergencies

to support incident response activities and maintain City-wide response capabilities (County of San Diego 2023).

San Diego County Emergency Operations Plan

Additionally, the City is a participating agency in the County's Unified San Diego County Emergency Services Organization and 2022 County of San Diego Operational Area Emergency Operations Plan (EOP), which addresses emergency issues. The San Diego County EOP's operational area consists of 19 jurisdictions 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 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.

The 2022 EOP notes that "Primary evacuation routes consist of the major interstates, highways and prime arterials within San Diego County." The closest primary evacuation routes within the vicinity of the project site are I-15 and I-805 west of the site and SR 94 south of the site (County of San Diego 2022).

Airport Land Use Compatibility Overlay Zone

The project site is within the Airport Influence Area (San Diego International Airport – Review Area 2), Airport Land Use Compatibility Overlay Zone. Chapter 13 Article 2, Division 15 of the SDMC establishes the Airport Land Use Compatibility Overlay Zone, which ensures that new development located within an airport influence area is compatible with respect to airport-related noise, public safety, airspace protection, and aircraft overflight areas. Regulations include safety compatibility and aircraft overflight notification.

City of San Diego General Plan

The City's General Plan Land Use and Community Planning Element and Public Facilities, Services, and Safety Element (City of San Diego 2024) present goals and policies relating to health and safety. The following goals and policies are applicable to the project.

- LU-G.4** Submit development projects affected by an airport influence area to the ALUC after the adoption or amendment to an Airport Land Use Compatibility Plan to ensure that they are consistent up until the time that the ALUC has determined the General Plan, community plans, and specific plans consistent with the Airport Land Use Compatibility Plan or have the City Council take steps to overrule the ALUC.

- LU-G.6.** Require that all proposed development projects (ministerial and discretionary actions) notify the FAA in areas where the proposed development meets the notification criteria as defined by Code of Federal Regulation Title 14, Part 77. a. Require that all proposed development projects that are subject to FAA notification requirement provide documentation that FAA has determined that the project is not a Hazard to Air Navigation prior to project approval. b. Require that the Planning Commission and City Council approve any proposed development that the FAA has determined to be a Hazard to Air Navigation once state and ALUC requirements are satisfied.
- PF-D.6.** Provide public safety related facilities and services to assure that adequate levels of service are provided to existing and future development.
- PF-D.10** Buffer or incorporate design elements to minimize impacts from fire stations to adjacent sensitive land uses, when feasible.

5.8.3 IMPACTS ANALYSIS

5.8.3.1 Issues 1, 2, and 3: Hazardous Materials

- Issue 1:** *Would the proposal 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?*
- Issue 2:** *Would the proposal expose people to toxic substances, such as pesticides and herbicides, some of which have long-lasting ability, applied to the soil during past agricultural uses?*
- Issue 3:** *Would the proposal 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

Per the City's Significance Determination Thresholds (City of San Diego 2022), impacts related to health and safety could be significant if the project would:

- Be located on a site on or near known contamination sources. Project sites that meet one or more of the following criteria may result in a significant impact:
 - Located within 1,000 feet of a known contamination site;

- Located within 2,000 feet of a known border zone property (also known as a Superfund site) or a hazardous waste property subject to corrective action pursuant to the Health and Safety Code;
- If a DEHQ (formerly DEH) site file is closed. These cases are especially important where excavation is involved. DEHQ often closes a listing when there is no longer danger to the existing use on the property. Where a change in use is proposed DEHQ should be consulted. Excavation, which would disturb contaminated soils, potentially resulting in the migration of hazardous substances would require consultation by the applicant and analyst with DEHQ. The applicant may be required to obtain a concurrence letter from DEHQ subsequent to participation in the Voluntary Assistance Program (VAP);
- Location in Centre City San Diego, Barrio Logan or other areas known or suspected to contain contamination sites (Check with DEHQ).
- Location on or near an active or former landfill. Hazards associated with methane gas migration and leachates should be considered. Consult with the Local Enforcement Agency (LEA) for assistance.
- Properties historically developed with industrial or commercial uses which involved dewatering (the removal of groundwater during excavation), in conjunction with major excavation in an area with high groundwater (such as downtown).
- Located on a site presently or previously used for agricultural purposes.

Impact

The Cortese List was reviewed for hazardous waste sites along the project alignment. Resources included on the Cortese List include the following:

- List of leaking underground storage tank (LUST) sites from the SWRCB GeoTracker database;
- List of hazardous waste and substances sites from the DTSC EnviroStor database (currently mapped on GeoTracker);
- 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; and
- List of hazardous waste facilities subject to corrective action identified by DTSC.

The project site was not identified in any of the above Cortese List databases. Nine cases were identified on the GeoTracker website within 2,000 feet of the project site, none of which are a known border zone property or a hazardous waste property subject to corrective action pursuant to the

Health and Safety Cod. None of the cases are located on the project site, and all cases are closed. Three cases at two sites were identified within 1,000 feet of the project: Webster Elementary School and Federal Express. The Webster Elementary School is about 450 feet from the project (i.e., within ¼ mile) and is a school site built on an old burn dump operating from approximately 1934 to 1941. The case is closed and completed as of 2014, and there are no potential media of concern listed on GeoTracker. Today, burn ash is overlain by about 2 to 15 feet of cover fill, asphalt, concrete/building slabs, and/or decomposed granite. In January 2018, DTSC conditionally approved the Removal Action Completion Report provided a Land Use Covenant and Operation and Maintenance Agreement are executed for the site. An Operation and Maintenance Plan was submitted and approved by DTSC on March 15, 2018 (DTSC 2025). Documentation of the site indicates that potential contamination is limited to the school property and does not extend into nearby properties, such as the proposed project site. The two other cases are approximately 900 feet south of the project site and involved the release of hazardous substances or petroleum products to the environment (SWRCB 2025). No accidents or other incidents involving the release of hazardous materials were identified within one mile of the project site. Based on the information provided, the regulatory status (closed), groundwater gradient and flow direction, and distance from the project site, it is unlikely that the three cases at these sites would be affected by development of the project.

The project is not located in Centre City San Diego, Barrio Logan, or other areas known or suspected to contain contamination sites. The project is not located on an active or former landfill. According to the geotechnical report (Appendix E.1), the groundwater table is expected to be below a depth that would influence planned construction. Therefore, the potential for dewatering is unlikely to be required. Additionally, the property has not been historically developed with industrial or commercial uses which involved dewatering. The property has not been previously used for any known agricultural purposes, and therefore is not anticipated to contain significant pesticides.

Construction of the project would involve the transport of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents. These materials would be used and stored in a designated off-site construction staging area and potentially within the boundaries of the project site, and once construction is completed any remaining materials would be transported off site.

Hazardous materials associated with operation of the fire station would be limited to use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available household hazardous materials. 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; use of these substances would be subject to the limitations listed on the labels intended to minimize health risk to the public associated with these products. The project also includes a 1,000-gallon diesel fuel tank that would be used to fuel the onsite emergency generator and other equipment. All hazardous materials have

the potential to become hazardous waste (e.g., spilled diesel), so an HMBP and permit are required to operate the proposed Fire Station. Strict operational protocols and safety measures as set forth by the SDFD would be in place to manage and reduce risk to health and safety from all use of hazardous materials as detailed below.

Fire station employees are trained in the proper use, storage, and handling of any potentially hazardous materials. SDFD has a specialized program and Station 45 for hazardous materials response. The SDFD HAZMAT Program is equipped with two primary hazardous materials response units; HM1 and HM2. Each of these "Big Red" HAZMAT units is a specialized emergency response vehicle equipped to handle hazardous material incidents (chemical spills, fuel spills, compressed gas releases, etc.) and is staffed with specially trained personnel. Each apparatus is equipped with a mobile mini-laboratory, which allows the Hazardous Materials Technicians and Specialists to identify unknown substances and "suspicious" materials on site. Each unit carries a wide range of PPE, specifically designed to be worn in the presence of hazardous environments that are immediately dangerous to life and property. This specialized PPE allows the HAZMAT Techs to work for extended periods in IDLH (Immediately Dangerous to Life or Health) atmospheres.

In addition, SDFD works in tandem with the County in a joint effort called the Hazardous Incident Response Team. All SDFD first responder personnel are trained and equipped to perform at the "First Responder Operational (FRO) Level." As defined in Title 8, Section 5192 of the California Code of Regulations, the response objectives of FRO personnel are:

- a. Protect life, the environment, and property from the effects of the release.
- b. Respond in a defensive fashion, working to contain the release from a safe distance, reducing spread and protecting exposures.
- c. Initiate appropriate decontamination procedures to protect emergency responders, the public, equipment, and property.
- d. Request additional resources as necessary to assist with the incident, including the Hazardous Materials Incident Response Team (HIRT).

The HIRT provides specialized emergency response services to actual or threatened releases of hazardous materials anywhere within the County of San Diego. All HIRT members are trained and equipped to perform at or above the "Hazardous Materials Technician Level." Their functions include:

- a. Evaluate the incident specifics and provide a hazard and risk assessment to the Incident Commander (IC)
- b. Perform specialized control, containment, and confinement operations
- c. Identify unknown materials

- d. Establish a decontamination plan
- e. Determine proper personal protective equipment (PPE)
- f. Develop an Incident Action Plan (IAP) and a Site Safety Plan
- g. Provide a Hazardous Materials Safety Officer
- h. Gather responsible party information for cost recovery
- i. Perform rescues requiring chemical protective clothing
- j. Insure proper notifications are completed
- k. Provide recommendations and assistance to the IC regarding site mitigation and clean-up procedures
- l. Evaluate cleanup contractor to insure safe and effective operations

With trained first responders at the proposed station, and an additional station that could be utilized by HIRT, response times to hazardous incidents in the vicinity of the station would improve. Extensive training of SDFD staff as well as 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 are minimized and that such substances are handled appropriately in the event of accidental release.

Significance of Impact

The project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Soil contamination is not expected to be disturbed by project construction. Any hazardous materials used during construction or operation of the project would be transported, stored, handled, and disposed of by trained personnel in accordance with applicable federal, state, and local laws and regulations pertaining to the management and use of hazardous materials. All project operations would adhere to the SDFD requirements to ensure the safety of its employees and surrounding community. Impacts would be **less than significant**.

Mitigation

No mitigation would be required.

5.8.3.2 Issues 4 and 5: Airport Hazards

Issue 4: *Would the proposal result in a safety hazard for people residing or working in a designated airport influence area?*

Issue 5: *Would the proposal result in a safety hazard for people residing or working in a designated airport influence area or within two miles of a private airstrip or heliport facility that is not covered by an adopted ALUCP?*

Thresholds

Per the City's Significance Determination Thresholds (City of San Diego 2022), health and safety impacts may be significant if the project would:

- Projects located in a designated airport influence area and where the Federal Aviation Administration (FAA) has reached a determination of “hazard” through FAA Form 7460-1, “Notice of Proposed Construction or Alteration” as required by FAA regulations in the Code of Federal Regulations (CFR) Title 14 77.13. Note: if the FAA determines the project would be considered a hazard, a Site Development Permit (SDP) in accordance with Process 5 would be required for Council approval in accordance with the Municipal Code 126.0502(e).
- Inconsistency with an Airport's Land Use Compatibility Plan (ALUCP) could be a significant impact.
- For a project within the boundaries of a comprehensive airport land use plan, or if a comprehensive land use plan has not been adopted for a project within two nautical miles of a public airport or public use airport, CEQA Section 21096 and CEQA State Guidelines Section 15154 requires that the lead agency consider whether the project would result in a safety hazard or noise problem for persons using the airport or for persons residing or working in the project area in order to adopt a negative declaration or mitigated negative declaration.

Impact

The project site is located within the Airport Influence Area (San Diego International Airport – Review Area 2), Airport Land Use Compatibility Overlay Zone. Review Area 2 is defined by the combination of the airspace protection and overflight boundaries beyond Review Area 1. Only airspace protection and overflight policies and standards apply within Review Area 2. Airport land use compatibility or ALUC review is required for land use plans and regulations within Review Area 2 that propose buildings or uses that exceed the 200-foot height limit and for land use projects that; have received from the FAA a Notice of Presumed Hazard, a Determination of Hazard or a Determination of No Hazard subject to conditions, limitations or marking and lighting requirements, and/or would create glare, lighting, electromagnetic interference, dust, water vapor, smoke, thermal plumes, and bird attractant hazards. The project site is not located within the boundary of the noise contours for San Diego International Airport and is not within a Safety Zone for the San Diego International Airport (County of San Diego 2014).

The project is proposing a 22,443 square-foot four story fire station on a 1.28-acre project site that would be 64 feet in height. The project would not exceed the ALUCP height limit of 200 feet within Review Area 2. The project does not include elements that would generate lighting, glare, dust, or other hazards that could interfere with aircraft operations.

Given that the project has been designed in compliance with FAA regulations and would not introduce any hazards to air navigation, including glare or electromagnetic interference, the project is not anticipated to result in a safety hazard for people working in a designated airport influence area. Furthermore, because the project site is located outside any designated noise contours or Safety Zones associated with the San Diego International Airport, the project is not expected to pose additional risks to employees on site from airport operations.

Additionally, the project is consistent with the San Diego International Airport's ALUCP and the project site is not located within two miles of any private airstrips or heliports that are not covered by an adopted ALUCP. As a result, the project would not present a safety hazard for people residing or working near such facilities. The design and function of the fire station align with applicable standards, and the project's location relative to air navigation and operational zones further minimizes any potential hazards. Compliance with the FAA regulations and the ALUCP Review Area 2 requirements would ensure that the project would result in a less-than-significant airport safety hazard impact.

Significance of Impact

The project site is not located within the San Diego International Airport Safety Zone (San Diego County Regional Airport Authority 2025); therefore, no conflicts within the San Diego International Airport Safety Zone would occur. The project would not result in airport safety hazards for people working in the project area and the project would be consistent with the San Diego International Airport ALUCP and would not result in a safety hazard for people working within an airport influence area. Also, the project is not located within 2.0 miles of a private airstrip or helipad facility. The project is in compliance with the ALUCP Review Area 2 and FAA Determination of No Hazards requirements. Consequently, impacts would be **less than significant**.

Mitigation

No mitigation would be required.

5.8.3.3 Issue 6: Wildland Fires

Issue 6: *Would the proposal 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?*

Threshold

Per the City's Significance Determination Thresholds (City of San Diego 2022), health and safety impacts may be significant if the project would 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.

Impact

As discussed in Section 5.18, Wildfire, and shown in Figure 5.18-1, the project site is within a LRA and classified as a non-Very High FHSZ. Although the site itself is not within a designated High or Very High FHSZ, it is adjacent to undeveloped areas to the north, west, and east, which could present a wildfire risk due to the presence of natural vegetation. In light of this, the project has been designed to comply with the City's fire safety standards, specifically implementing the City's Brush Management Regulations as outlined in Section 142.0412 of the Land Development Code. These regulations prescribe key design measures to ensure adequate fire safety for development within the City, especially when interfacing with areas of native or naturalized vegetation.

To further reduce wildfire risks, the project would implement a detailed Brush Management Plan, which includes the designation of two distinct Brush Management Zones (BMZ) to provide a firebreak between developed structures and surrounding wildlands:

- Zone One is located adjacent to the structure and includes non-flammable materials, such as pavement, and permanently irrigated ornamental planting. Tree canopies within Zone One would be situated no closer than 10 feet from any habitable structures to prevent the risk of fire spread via vegetation. Additionally, Zone One is restricted from being placed on slopes with a gradient steeper than 4:1, further minimizing fire risks in areas with challenging terrain. Zone One extends up to 43 feet beyond the northern side of the fire station and between 10 and 15 feet beyond the western and southern sides of the fire station.
- Zone Two is situated between Zone One and contiguous areas of native or naturalized vegetation. It would consist of thinned native or naturalized, non-irrigated vegetation, which serves as a buffer, further reducing the risk of wildfire spread into developed areas. A Zone Two Brush Management area, varying from approximately 53 feet in the northwest portion of the project area up to approximately 90 feet in the western portion of the project area, would extend beyond Zone 1.
- A 6- to 25-foot-tall retaining wall would function as an alternative construction measure to compensate for the reduced Zone One Defensible Space.

While the brush management zones and overall site layout aim to minimize wildfire risks during both construction and operation phases, certain conditions have been identified that could introduce short-term risks during construction. For example, excavation and grading activities would involve heavy equipment operating near undeveloped areas, creating the potential for sparks that could ignite a fire. However, the Brush Management Plan would address this through pre-construction vegetation clearance and ongoing maintenance of firebreaks throughout the construction period. Vegetation removal, particularly in the BMZs, would be conducted in accordance with the SDMC Section 142.0412, under the supervision of the SDFD, ensuring compliance with all applicable fire safety measures.

Additionally, as part of the project, a 1,000-gallon diesel fuel tank would be installed to fuel the onsite emergency generator and other equipment. Although this introduces a potential fuel source for fire, strict operational protocols and safety measures would be in place to manage and reduce this risk. Furthermore, the fire station's operations would focus on fire suppression and emergency response, which inherently reduces the likelihood of fire-related incidents occurring on-site or spreading from adjacent undeveloped areas.

Overall, the proposed fire station's design, combined with the implementation of the Brush Management Plan, would ensure that the risk of wildfires impacting people or structures is minimized. The project would comply with City's fire safety regulations, particularly regarding brush management and landscaping, to prevent fire spread from surrounding vegetation. Given these proactive measures, the potential for exposure to significant risk of loss, injury, or death involving wildland fires is considered less than significant.

Significance of Impact

Impacts related to exposure to wildfire risk would be **less than significant**.

Mitigation

No mitigation would be required.

5.8.3.4 Issue 7: Emergency Response Plan or Emergency Evacuation Plan

Issue 7: Would the project impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Threshold

Per the City's Significance Determination Thresholds (City of San Diego 2022), health and safety impacts may be significant if the project would impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Impact

As discussed in Section 5.8.2, Regulatory Framework, the City is a participating entity in the MHMP (County of San Diego 2023), which is generally intended to provide compliance with regulatory requirements associated with emergency response efforts. The 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, including Interstate 805 and Highway 94. The project site is located 0.8 miles east of Interstate 805 and approximately 0.50 miles north of Highway 94, both of which are designated as emergency evacuation routes. Given the proximity of these highways, the project

location is designed to facilitate access to evacuation routes, which would help to ensure efficient emergency response and evacuation efforts.

The project, which involves the construction and operation of a fire station, does not introduce new housing or a permanent population, thereby minimizing any potential impacts on the surrounding transportation network in an emergency. The nature of the project as a fire station further enhances emergency response capabilities in the area, as the facility would serve as a critical first responder in the event of an emergency.

During short-term construction, temporary encroachments into 47th Street may occur, but these would be carefully managed to prevent obstructions to vehicle flow in the event of an emergency. Construction-related impacts would be minor and temporary, with no anticipated interference with emergency response or evacuation routes. No intersection or roadway improvements are proposed as part of the project, as the project would not substantially increase vehicle trips in the area. The fire station itself would generate minimal new daily trips, primarily consisting of operational staff and fire service vehicles.

As detailed in Section 3.2.4, the project would connect to the City's existing 8-inch water main located in 47th Street, which has sufficient pressure (104 psi) to meet fire safety standards. The fire service would be supported by a dedicated 6-inch water service line with a Reduced Pressure Backflow Device and Lateral, ensuring the necessary water supply in the event of an emergency. In terms of access, the project site would be served by two driveways off 47th Street: one standard driveway for passenger vehicles and one larger driveway connected to the apparatus bay to accommodate fire vehicles and equipment. Both access points are located on the east side of the project site and are designed to ensure efficient ingress and egress, even during emergencies.

Finally, the project is subject to review by the San Diego Fire-Rescue Department and the City of San Diego's Building Codes to ensure compliance with all applicable safety standards, further minimizing any potential for interference with emergency response or evacuation plans.

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

No mitigation would be required.

5.9 HYDROLOGY

This section describes the existing hydrology conditions of the proposed Fairmount Avenue Fire Station 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 Floodplain Evaluation report, prepared by RRM Design Group (July 22, 2019), the Preliminary Drainage Study, prepared by RRM Design Group (January 29, 2020; and the Updated Geotechnical Investigation, prepared by SCST, an Atlas company (February 5, 2020). These reports are included as Appendices F.1, F.2, and E.1.

5.9.1 EXISTING CONDITIONS

Regional Hydrology

The project site is located within the Chollas Creek Watershed which encompasses approximately 16,270 acres of urbanized land within San Diego County. The watershed is further divided into larger North Fork (9,276 acres) and South Fork (6,997 acres) subwatersheds (County of San Diego 2009). The drainage area of the Chollas Creek Watershed originates in the cities of Lemon Grove and La Mesa. Chollas Creek flows through the City of San Diego (City) and empties to the eastern shoreline of San Diego Bay. Over the past 68 years, Chollas Creek has been modified, diverted, channelized, and concrete-lined in several locations, primarily for flood control purposes. Approximately 30% of the creek was channelized prior to the November 28, 1975, adoption of the Water Quality Control Plan for the San Diego Basin (Basin Plan). There have been more recent efforts to restore natural flow in the watershed.

The North Fork of Chollas Creek is located approximately 300 feet northwest of the project site where it crosses in a northeast to southwest direction (Appendix F.1).

Existing Drainage Patterns

Currently, the project site consists of undeveloped land covered in vegetation where the existing drainage occurs as sheet flow in a northerly to northwesterly direction over the moderate to steeply sloping natural hillside. The existing topographic elevations range from 194 feet amsl in the southeast to 140 feet amsl in the northwest (Appendix F.2). Over 40% of the site has a slope gradient that exceeds 25%. An existing 18-inch storm drain line that collects flows from 47th Street, crosses onto the project site below ground then daylights at the bottom of the site slope at the north of the site and drains offsite towards Chollas Creek (Appendix F.2). All other runoff from the project site drains north to Chollas Creek.

According to calculations that were made for the site as part of the Preliminary Drainage Study, the 50-year¹ and 100-year design storms would create peak discharges at the major point of concentration on the site of 2.25 and 2.60 cubic feet per second (Appendix F.2).

Groundwater

The project site is located within the Coastal Plain of the San Diego Groundwater Basin (9-033). The basin underlies the cities of San Diego, National City, Chula Vista, Imperial Beach, and San Ysidro in southwestern San Diego County (Department of Water Resources [DWR] 2024a). The basin boundary represents the area underlain by the San Diego Formation. The basin is bound on the west by the San Diego Bay and the Pacific Ocean, on the south by the international border with Mexico, on the east by the La Nacion fault and the lateral extents of the San Diego Formation and the alluvial areas in Otay Valley and Sweetwater Valley, and on the north by the alluvium of the Mission Valley Basin. The surface waters that provide recharge to the basin are drained westerly towards the Pacific Ocean by the Sweetwater River, the Otay River, the Tijuana River, and various creeks. Average annual precipitation in the city ranges from about 12 to 20 inches.

The basin has approximately 195 groundwater wells, of which approximately 13 are water supply wells (Groundwater Exchange 2024). Groundwater accounts for approximately 5% of the basin's water supply (Groundwater Exchange 2024). According to the Department of Water Resources and the Sustainable Groundwater Management Act, the basin is considered a low priority and is not required to prepare and implement a groundwater sustainability plan (DWR 2024b).

No groundwater was encountered during the field explorations (i.e., test pits and trenching) conducted as part of the preliminary geotechnical investigation of the project site (Appendix E.1). However, water seepage was observed in one test pit at a depth of about 5 ½ feet below ground surface (Appendix E.1). According to the geotechnical report, the groundwater table is expected to be below a depth that would influence planned construction. However, groundwater levels may fluctuate in the future due to rainfall, irrigation, broken pipes, or changes in site drainage (Appendix E.1).

Flood Hazards

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), the project site encroaches on the 100-year and 500-year flood zone areas associated with Chollas Creek (FEMA 2024). However, the area of proposed improvements are located outside of the 100-year flood zone (FEMA 2024). The 100-year and 500-year flood zones are defined as areas that are

¹ A 50-year storm is defined as a storm that has 2% chance of occurring in any one year. A 100-year storm event has a 1% chance of occurring in any one year.

considered to have a 1% and 0.2% chance, respectively, of being exceeded in any one given year. See Figure 5.9-1, Flood Hazards identifies the flood zone areas.

Flooding can also occur due to the catastrophic failure of a dam. There have been at least 85 dam failures across California in recorded history including the 1916 failure of the dam abutments on the Sweetwater Dam in San Diego County, located over 5 miles southeast of the project site (and outside of the inundation area). The project site is well outside of the inundation area for the Sweetwater Dam, but according to mapping compiled by the California Department of Safety of Dams (DSOD), a catastrophic failure of Chollas Dam (No. 8-2) would inundate areas adjacent to the project site (DSOD 2024).

5.9.2 REGULATORY FRAMEWORK

Federal

Clean Water Act

The Clean Water Act (CWA), as amended, authorizes federal, state, and local entities to cooperatively create comprehensive programs for eliminating or reducing the pollution of state waters and tributaries. The primary goals of the CWA are to restore and maintain the chemical, physical, and biological integrity of the nation's waters and to make all surface waters fishable and swimmable. As such, the CWA forms the basic national framework for the management of water quality and the control of pollutant discharges. The CWA also sets forth a number of objectives in order to achieve the above-mentioned goals. These objectives include regulating pollutant and toxic pollutant discharges; providing for water quality that protects and fosters the propagation of fish, shellfish and wildlife; developing waste treatment management plans; and developing and implementing programs for the control of non-point sources of pollution.

The CWA deems the discharge of pollutants into waters of the United States from any point source unlawful unless authorized by a National Pollutant Discharge Elimination System (NPDES) permit. EPA issues NPDES permits for Municipal Separate Storm Sewer Systems (MS4s), specific categories of industrial activity (including landfills); and construction activity that disturbs 1 acre or more of land. The NPDES permit program is typically administered by individual authorized states; in California, the NPDES stormwater permitting program is administered by the State Water Resources Control Board (SWRCB).

The joint authority of water distribution and water quality protection allows the SWRCB to provide protection for the state's waters, through its nine RWQCBs. The RWQCBs develop and enforce water quality objectives and implement plans that best protect California's waters, acknowledging areas of different climates, topography, geology, and hydrology. The RWQCBs develop "basin plans" for their

hydrologic areas, issue waste discharge requirements, enforce action against stormwater discharge violators, and monitor water quality. The RWQCB is responsible for the protection of the beneficial uses of waters within the project area. The RWQCB uses its planning, permitting, and enforcement authority to meet its responsibilities adopted in the Basin Plan for the Coastal Watersheds of San Diego (Basin Plan) to implement plans, policies, and provisions for water quality management.

Sections 401 & 404 of the Clean Water Act (Dredge and Fill Permits)

Section 401 of the CWA requires that an applicant for any federal permit (e.g., a U.S. Army Corps of Engineers [ACOE] Section 404 permit) obtain certification from the state, requiring that discharge to waters of the United States would comply with provisions of the CWA and with state water quality standards. For example, an applicant for a permit under Section 404 of the CWA must also obtain water quality certification per Section 401 of the CWA. Section 404 of the CWA requires a permit from the ACOE prior to discharging dredged or fill material into waters of the United States, unless such a discharge is exempt from CWA Section 404. For the project site, the RWQCB must provide the water quality certification required under Section 401 of the CWA. As discussed in Section 4.4, Biological Resources, of this Draft EIR, an ACOE Section 404 permit and associated 401 Certification are not expected to be required for the project.

Section 402 of the Clean Water Act (National Pollutant Discharge Elimination System)

The NPDES permit program, as authorized by Section 402 of the CWA, was established to control water pollution by regulating point sources that discharge pollutants into waters of the United States (33 USC 1342). In the state of California, the U.S. EPA has authorized the SWRCB permitting authority to implement the NPDES program. The regulations require that stormwater discharges from small MS4s be regulated by an NPDES General Permit for Storm Water Discharges Associated with Construction Activity, Order No. 99-08-DWQ. The Construction General Permit requires the development and implementation of a stormwater pollution prevention plan (SWPPP), which describes best management practices (BMPs) the discharger would use to protect stormwater runoff. The SWPPP must contain a visual monitoring program, a chemical monitoring program for non-visible pollutants to be implemented if there is a failure of BMPs and a sediment-monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment. Routine inspection of all BMPs is required under the provisions of the Construction General Permit. On September 2, 2009, the SWRCB issued a new NPDES General Permit for Storm Water Associated with Construction Activities (Order No. 2009-0009-DWQ, NPDES No. CAS000002), which became effective July 1, 2010.

National Flood Insurance Act

The National Flood Insurance Act of 1968 established the National Flood Insurance Program in order to provide flood insurance within communities that were willing to adopt floodplain management programs to mitigate future flood losses. The act also required the identification of all floodplain areas within the United States and the establishment of flood-risk zones within those areas. FEMA is the primary agency responsible for administering programs and coordinating with communities to establish effective floodplain management standards. FEMA is responsible for preparing Flood Insurance Rate Maps that delineate the areas of known special flood hazards and their risk applicable to the community. The program encourages the adoption and enforcement by local communities of floodplain management ordinances that reduce flood risks. In support of the program, FEMA identifies flood hazard areas throughout the United States on FEMA flood hazard boundary maps. The project site encroaches on the 100-year and 500-year flood zone areas associated with Chollas Creek (see Figure 5.9-1).

Executive Order 11988

Under Executive Order 11988 – Floodplain Management, the FEMA is responsible for management of floodplain areas defined as the lowland and relatively flat areas adjoining inland and coastal waters subject to a 1% or greater chance of flooding in any given year (the 100-year floodplain). FEMA requires that local governments covered by federal flood insurance pass and enforce a floodplain management ordinance that specifies minimum requirements for any construction within the 100-year floodplain. The Order addresses floodplain issues related to public safety, conservation, and economics. It generally requires federal agencies who construct, permit, or fund a project in a floodplain to avoid incompatible floodplain development, be consistent with the standards and criteria of the National Flood Insurance Program, and restore and preserve natural and beneficial floodplain values.

State

National Pollutant Discharge Elimination System Permits

In California, the SWRCB and its nine RWQCBs administer the NPDES permit program. NPDES permits cover all construction and subsequent drainage improvements that disturb 1 acre or more, industrial activities, and municipal separate storm drain systems. Construction and industrial activities are typically regulated under statewide general permits that are issued by the SWRCB, who also issue a statewide general small MS4 stormwater NPDES permit for public agencies that fall under the Phase II NPDES regulations (SWRCB 2025).

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 currently operates under the NPDES Municipal Separate Storm Sewer System (MS4) 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 RWQCB approved a regional MS4 Permit for San Diego, southern Orange, and southwestern Riverside counties, which became effective on June 27, 2013 (R9-2013-0001). 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 2013 MS4 Permit renewed the previous municipal NPDES permit and changed some of the requirements for water quality improvements and construction BMPs. These updated requirements are reflected in the February 2016 update of the Stormwater Standards Manual (see below). The Regional MS4 Permit required the development of Water Quality Improvement Plans that 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.

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, and to protect the public health, safety, and welfare of persons, property, and the environment. The Grading Regulations require permittees to 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 Drainage Design Manual

The primary purpose of the City's Drainage Design Manual, last updated May 2021, 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 2021).

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; and the Conservation Element (City of San Diego 2024a, 2024b). Goals and policies applicable to the project are 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 (City of San Diego 2024a). Specific policies applicable to the project include:

- PF-G.1.** Ensure that all storm water conveyance systems, structures, and maintenance practices are consistent with the federal Clean Water Act and California Regional Water Quality Control Board NPDES 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.3.** Meet and preferably exceed regulatory mandates to protect water quality 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

This 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). Specific policies include:

- CE-E.2.** Apply water quality protection measures to land development projects early in the process-during project design, permitting, construction, and operations-in order to minimize the quantity of runoff generated on-site, the disruption of natural water flows and the contamination of storm water runoff.
- a. Increase on-site infiltration, and preserve, restore or incorporate natural drainage systems into site design.
 - b. Direct concentrated drainage flows away from the MHPA and open space areas. If not possible, drainage should be directed into sedimentation basins, grassy swales or mechanical trapping devices prior to draining into the MHPA or open space areas.
 - c. Reduce the amount of impervious surfaces through selection of materials, site planning, and street design where possible.
 - d. Increase permeable areas for new trees and restore spaces that have been paved, focused in areas with the greatest needs.
 - e. Increase the use of plants in drainage design.
 - f. Maintain landscape design standards that minimize the use of pesticides and herbicides.
 - g. 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.

- h. Apply land use, site development, and zoning regulations that limit impacts on, and protect the natural integrity of topography, drainage systems, and water bodies.
- i. Enforce maintenance requirements in development permit conditions.
- j. Increase the use of green infrastructure, both at watershed scale and site-specific locations.

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.

CE-E.4. Continue to participate in the development and implementation of Water Quality Improvement Plans for water quality and habitat protection.

CE-E.5. Assure that City departments continue to use “Best Practice” procedures so that water quality objectives are routinely implemented.

- a. Incorporate water quality objectives into existing regular safety inspections.
- b. Follow Best Management Practices and hold training sessions to ensure that employees are familiar with those practices.
- c. Educate City employees on sources and impacts of pollutants on urban runoff and actions that can be taken to reduce these sources.
- d. Ensure that contractors used by the City are aware of and implement urban runoff control programs.
- e. Serve as an example to the community-at-large.

CE-E.6. Continue to encourage “Pollution Control” measures to promote the proper collection and disposal of pollutants at the source, rather than allowing them to enter the storm drain system.

- a. Promote the provision of used oil recycling and/or hazardous waste recycling facilities and drop-off locations.
- b. Review plans for new development and redevelopment for connections to the storm drain system.

- c. Follow up on complaints of illegal discharges and accidental spills to storm drains, waterways, and canyons.

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

5.9.3 IMPACTS ANALYSIS

5.9.3.1 Issues 1 and 2: Drainage

Issue 1: *Would the project result in impervious surfaces and associated increased runoff?*

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

Thresholds

The City's Significance Determination Thresholds (City of San Diego 2022) identify potentially significant impacts related to runoff if a project would:

1. Result in increased flooding on- or off-site there may be significant impacts on upstream or downstream properties and to environmental resources;
2. Result in decreased aquifer recharge there may be significant impacts on hydrologic conditions and well-water supplies because the area available for aquifer recharge is reduced. When a subsurface water source fails to be recharged by rainfall, its volume will be reduced. Reduced groundwater elevation can affect landholders who are dependent on well water, vegetation, and surface water replenishment. In addition, if a project would result in extraction of water from an aquifer, impacts on hydrologic conditions would be significant if there would be a net deficit in the aquifer volume or a reduction in the local groundwater table.
3. Projects which would create over 1.0 acres of impermeable hardscape in areas utilizing well water and projects which would install groundwater extraction wells may result in significant impacts.
4. If a project would grade, clear, or grub more than 1.0 acre of land, especially into slopes over a 25% grade, and would drain into a sensitive water body or stream there may be significant impacts on stream hydrology if uncontrolled runoff results in erosion and subsequent sedimentation of downstream water bodies.

5. If a project would result in modifications to existing drainage patterns there may be significant impacts on environmental resources such as biological communities and archaeological resources.

Projects which would result in substantial changes to stream-flow velocities or quantities may result in a significant impact (to be determined on a case by case basis; streambed characteristics will affect determination)

Impact

Aquifer and Groundwater Recharge

The project site is currently entirely covered by pervious surfaces and development of the project would develop 30% of the site (located in the southeast portion) and increase impervious surfaces to 84% of the site for the disturbed portion of the site while the remaining 70% of the site would remain entirely pervious (Appendix F.2). The site currently includes relatively steep slopes with over 40% of the site with a slope gradient that exceeds 25% which reduces the ability for onsite infiltration. If not designed appropriately, the increase in impervious surfaces would result in a reduction in onsite groundwater recharge. As required by the City's Municipal Code and in accordance with the City's Stormwater Standards Manual and MS4 Permit requirements, the project would be required to include drainage control improvements that retain/detain peak stormwater flows onsite. The detention requirements would work in conjunction with the Hydromodification Management Plan requirements, as described in the City's Stormwater Standards Manual. The project would be designed so that runoff rates and durations are controlled to maintain existing conditions for the 50-year and 100-year storm events by retaining peak stormwater events onsite (Appendix F.2). Stormwater runoff from the project site would continue to be directed toward Chollas Creek and would maintain or reduce pre-project runoff conditions with implementation of retention and detention systems consistent with existing stormwater regulations. Therefore, as the project would only disturb 30% of the site (approximately 0.38 acres), and with the implementation of onsite retention/detention facilities, the project would not 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. Impacts would be less than significant.

Runoff

As discussed in Section 5.9.1, the project site is currently undeveloped. Implementation of the project would result in a substantial increase in impervious surfaces at the project site (from 0 to 84%). According to the Preliminary Drainage Study prepared for the project (Appendix F.1), the project design would have Low Impact Development features that include a detention system to

provide management of stormwater associated with development and reduce the peak runoff rates to not exceed existing conditions (Appendix F.2).

As shown in Figure 5.9-2, Proposed Drainage Control Conditions, the project development area would be subdivided into 3 different drainage basins (DMA-1, DMA-2, and DMA-3). For DMA-1, runoff would be captured by a property-line trench drain at the bottom of the driveway and conveyed via an underground storm drain to the biofiltration system. The treated runoff would then be stored in the underground detention vault until final discharge to Chollas Creek via the existing drainage path (Appendix F.2). Runoff from DMA-2 would be captured by trench drains and a drainage inlet and conveyed to the biofiltration system. The treated runoff then would be stored in the underground detention vault as with DMA-1 runoff. Runoff from DMA-3 would be self-treated with runoff contained within the drainage area and allowed to infiltrate onsite (Appendix F.2). The remainder of the site would not be developed, and stormwater would continue to flow north towards Chollas Creek the same as under existing conditions. The proposed runoff conditions for the site are provided in Table 5.9-1.

Table 5.9-1
Proposed Stormwater Runoff Conditions

Discharge Locations	Unretained Conditions			Detained Conditions		
	<i>Drainage Basin</i>	<i>Acres</i>	<i>50/100-year flow (cfs)*</i>	<i>Drainage Basin</i>	<i>Acres</i>	<i>50/100-year flow (cfs)*</i>
Entire Site (Existing Conditions)**	Project Site	1.28	2.60	—	—	—
Building Footprint and driveway	—	0.22	1.21/1.40	DMA-1	0.22	0.90/1.04
Parking Lot, trash area, lobby	—	0.20	0.88/1.02	DMA-2	0.20	0.71/0.82
Area between building and Retaining Wall (self-treating)	—	0.04	0.07/0.08	DMA-3	0.04	0.02/0.02

Source: Appendix F.2.

Notes:

* cfs = cubic feet per second

** In the undeveloped (existing condition), runoff was calculated for the peak discharge for the major point of concentration which is the lowest point of the site towards the northwest edge of the site boundary (See Figure C-5.1 of Appendix F.2). The proposed conditions focus on the 0.45-acre portion of the site that would be graded and developed.

As shown in this table, the implementation of the project would provide both detention and Hydromodification Management Plan (HMP)² facilities to reduce runoff rates to match existing conditions for the 50- and 100-year storm event. Requirements for the developed portion of the site would be designed so that runoff rates and durations are controlled to maintain or reduce pre-project downstream erosion conditions and protect the receiving water body, Chollas Creek. The project would address the increase in runoff by implementing stormwater Best Management Practices (BMPs) and installing a detention facility, which has been specifically designed for both detention and hydromodification management (Appendix F.2). As required by the City, the project would provide the storage needed to ensure stormwater flow rates are controlled to existing levels consistent with the Stormwater Standards Manual which meets NPDES MS4 Permit requirements.

While the project would change the existing drainage patterns within the development footprint and would increase impervious surfaces, these increased runoff volumes would be adequately retained to below the existing runoff rate conditions through the proposed BMPs and the detention basin. Therefore, potential impacts related to changes in runoff would be less than significant.

Erosion and Sedimentation

As discussed above, the project would include on-site drainage features (storm drainpipes, inlets, biofiltration system, underground detention system) to capture and convey stormwater runoff. The runoff would be treated for the Design Capture Volume (DCV) and Hydromodification Management Plan (HMP) facilities would be implemented to adhere to the City's retention and treatment requirements such that the potential increase in stormwater runoff rates due to the proposed increase in impervious areas would not result in substantive increases in erosion or sedimentation. Detention and water quality treatment facilities would be provided for the proposed development in accordance with the requirements of the City's Municipal Code and the San Diego RWQCB MS4 Permit. Thus, through compliance with the City and MS4 Permit requirements, the project would not result in substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes causing uncontrolled runoff that results in erosion and subsequent sedimentation of downstream water bodies. As a result, with runoff flows being equal to or less than existing conditions, there would be less than significant impacts to biological communities or archaeological sites, and impacts would be less than significant.

² Hydromodification management refers to drainage control features (e.g., detention/retention basins) that can be incorporated into design plans to address stormwater flow increases and potential pollutant sources that could occur with development or changes to existing drainage patterns.

Significance of Impact

The project would not result in increased stormwater runoff, decrease aquifer recharge, increase erosion of sedimentation, or have an adverse effect on drainage patterns. Impacts would be **less than significant**.

Mitigation

No mitigation would be required.

5.9.3.2 Issue 3: Flood Hazards

Issue 3: *Would the project develop wholly or partially within the 100-year floodplain as identified in the FEMA maps or impose flood hazards on other properties?*

Thresholds

The City's Significance Determination Thresholds (City of San Diego 2022) identify potentially significant impacts related to flood hazards if a project would:

- Impose flood hazards on other properties or development, or result in substantial changes to stream flow velocities or quantities; or
- Impose flood hazards on other properties or development, or be proposed to develop wholly or partially within the 100-year floodplain identified on the FEMA maps.

Impact

As shown in Figure 5.9-1, the project site encroaches on the 100-year and 500-year flood zone associated with Chollas Creek (FEMA 2024). None of the proposed improvements, which are all located in the southeastern corner of the site, are located within the 100-year flood zone. However, the proposed improvements do encroach on the 500-year flood zone towards the northwest (Figure 5.9-1). As noted in the Floodplain Evaluation Report prepared for the project, where encroachments do occur, the grading and design would ensure that the building is sufficiently above the 500-year flood zone (Appendix F.1). In addition, as detailed above, the project would result in runoff flow rates at or below existing conditions with the inclusion of the proposed detention and HMP facilities. These stormwater control features would be sized and designed consistent with the City's Municipal Code requirements, Stormwater Standards Manual, and NPDES MS4 Permit requirements that include standards to ensure development does not result in increased flow volumes during peak storm events. Discharges from the underground detention vault would occur via the existing drainage path eventually flowing into Chollas Creek. Overall, the project would not result in changes

in flood flows that could create flood hazards on surrounding property or develop within a floodplain area. Therefore, project impacts related to flooding would be less than significant.

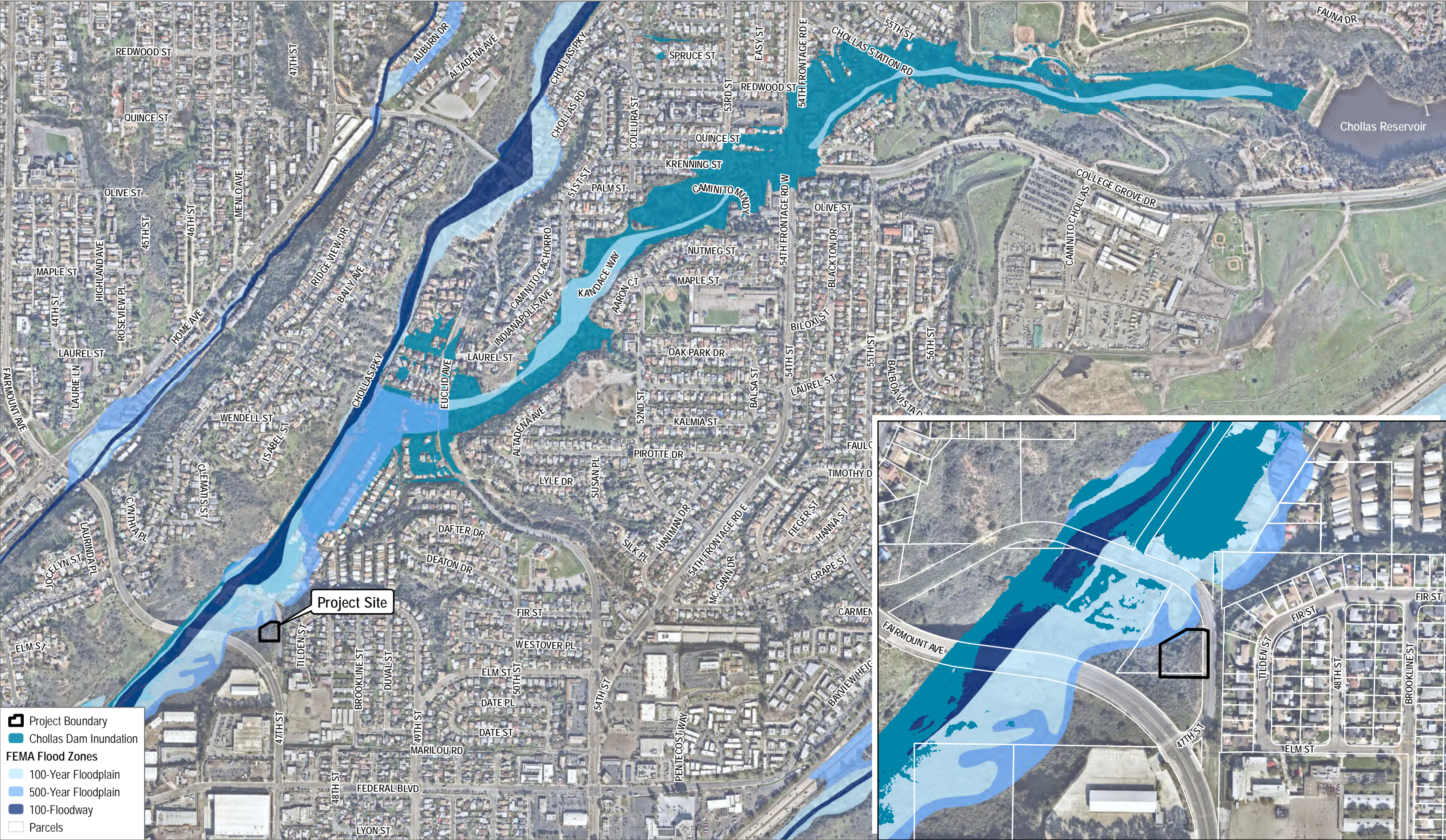
Significance of Impact

The project would not impose flood hazards on other properties or development or would develop within a 100-year floodplain. Impacts would be **less than significant**.

Mitigation

No mitigation would be required.

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SOURCE: RRM Design Group 2024; FEMA; CA Department of Water Resources; SANGIS 2023, 2024

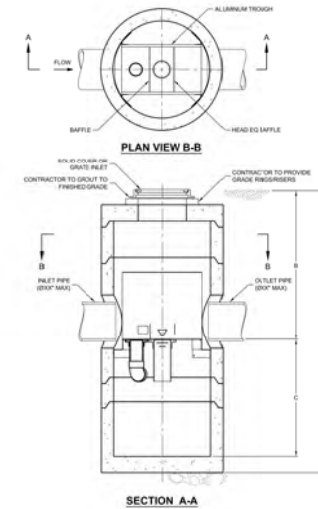
FIGURE 5.9-1
Flood Hazards
Fairmount Avenue Fire Station

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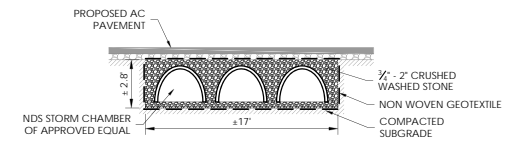
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LEGEND

- PROPERTY LINE
- - - DMA LIMITS
- BUILDING AREA (ROOF TOP)
- PARKING AREA (AC PAVEMENT)
- CONCRETE
- LANDSCAPE
- STORM DRAIN LATERAL
- DETENTION SYSTEM



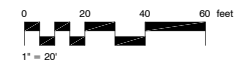
(A) BIO-FILTRATION SYSTEM
N.T.S.



(B) UNDERGROUND DETENTION SYSTEM
N.T.S.

DMA TABLE

DMA NUMBER	AREA (ACRES)	IMPERVIOUS AREA (ACRES)	% IMPERVIOUS	HSG	WEIGHTED RUNOFF COEFFICIENT	DCV (CUBIC FEET)	TREATED BY (BMP ID)	POLLUTANT CONTROL TYPE	DRAINS TO (POC ID)
TOTAL	0.46	0.37	80%	TYPE D	0.83	620	BF-1	BIOFILTRATION	POC 2
1	0.22	0.21	95%	TYPE D	0.96	345	BF-1	BIOFILTRATION	POC 1
2	0.20	0.16	80%	TYPE D	0.82	268	BF-1	BIOFILTRATION	POC 1
3	0.04	0	0%	TYPE D	0.10	7	SELF-TREATING	NA	NA



SOURCE: RRM 2024

DUDEK

FIGURE 5.9-2

Proposed Drainage Control Conditions

Fairmount Avenue Fire Station

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5.10 NOISE

This section describes the existing noise conditions of the proposed Fairmount Avenue Fire Station Project (project) site, describes basic fundamentals of noise and vibration, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if applicable, related to implementation of the project.

The following discussion is based upon the noise analysis technical report prepared by Dudek (February 2025) and included as Appendix G.

5.10.1 EXISTING CONDITIONS

5.10.1.2 Noise and Vibration Basics

Sound

Per the City's Significance Thresholds, noise is defined as unwanted or objectionable sound. Sound may be described in terms of level or amplitude (measured in decibels [dB]), frequency or pitch (measured in hertz or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the amplitude of sound is the decibel. Because the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale is used to relate noise to human sensitivity. The dBA scale performs this compensation by discriminating against low and very high frequencies in a manner approximating the sensitivity of the human ear. Several descriptors of noise (noise metrics) exist to help predict average community reactions to the adverse effects of environmental noise, including traffic-generated noise, on a community. These descriptors include the equivalent noise level over a given period (L_{eq}), the statistical sound level, the day-night average noise level (L_{dn}), and the Community Noise Equivalent Level (CNEL). Each of these descriptors uses units of dBA. Table 5.10-1 provides examples of A-weighted noise levels from common sounds. In general, human sound perception is such that a change in sound level of 3 dBA is barely noticeable, a change of 5 dBA is clearly noticeable, and a change of 10 dBA is perceived as doubling or halving the sound level.

**Table 5.10-1.
Typical Exterior and Interior Sound Levels in the Environment**

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
—	110	Rock band
Jet flyover at 300 meters (1,000 feet)	100	—
Gas lawn mower at 1 meter (3 feet)	90	—
Diesel truck at 15 meters (50 feet), at 80 kilometers per hour (50 mph)	80	Food blender at 1 meter (3 feet)
		Garbage disposal at 1 meter (3 feet)

**Table 5.10-1.
Typical Exterior and Interior Sound Levels in the Environment**

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
Noisy urban area, daytime	70	Vacuum cleaner at 3 meters (10 feet)
gas lawn mower at 30 meters (100 feet)		
Commercial area	60	Normal speech at 1 meter (3 feet)
Heavy traffic at 90 meters (300 feet)		
Quiet urban daytime	50	Large business office
		Dishwasher, next room
Quiet urban nighttime	40	Theater, large conference room (background)
Quiet suburban nighttime	30	Library
Quiet rural nighttime	20	Bedroom at night, concert hall (background)
—	10	Broadcast/recording studio
Lowest threshold of human hearing	0	Lowest threshold of human hearing

Source: Caltrans 2013.

Note: dBA = A-weighted decibel.

The L_{eq} value is a sound level energy-averaged over a specified period (typically no less than 15 minutes for environmental studies). It is a single numerical value that, if constant over time, represents the same amount of variable sound energy received by a receptor during a time interval. For example, a 1-hour L_{eq} measurement would represent the average amount of energy contained in all the noise that occurred in that hour. The L_{eq} value is thus an effective noise descriptor because of its ability to assess the total time-varying effects of noise on sensitive receptors.

Unlike the L_{eq} metric that can be defined for any duration, L_{dn} and CNEL descriptors always represent 24-hour periods, often on an annualized basis. The L_{dn} and CNEL values also differ from L_{eq} because they apply a time-weighted dB adjustment designed to emphasize noise events that occur during the evening and nighttime hours (when speech and sleep disturbance is of more concern). “Time weighted” refers to the fact that L_{dn} and CNEL penalize noise that occurs during certain sensitive periods. In the case of CNEL, noise occurring during the daytime (7:00 a.m.–7:00 p.m.) receives no penalty. Noise during the evening (7:00 p.m.–10:00 p.m.) is penalized by adding 5 dB, while nighttime (10:00 p.m.–7:00 a.m.) noise is penalized by adding 10 dB. L_{dn} differs from CNEL in that the daytime period is defined as 7:00 a.m.–10:00 p.m., thus eliminating the evening period. L_{dn} and CNEL are the predominant criteria used to measure roadway noise affecting residential receptors. These two metrics generally differ from one another by no more than 0.5 dB to 1 dB and, as such, are often treated as equivalent to one another.

Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Vibration can be a serious concern, causing buildings to shake and rumbling sounds to be heard. In contrast to noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as blasting, pile driving, and heavy earthmoving equipment.

Several different methods are used to quantify vibration. Peak particle velocity (PPV), expressed in inches per second (ips), is defined as the maximum instantaneous peak of the vibration signal and is most frequently used to describe vibration impacts to buildings. The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body and is defined as the average of the squared amplitude of the signal. Decibel notation (VdB) is commonly used to describe this RMS magnitude with respect to a reference value, which acts to compress the range of numbers required to discuss vibration in the context of impact assessment.

5.10.1.2 Existing Noise Environment

Physical Conditions

The project site is primarily characterized by undeveloped land on the top of a canyon between Fairmont Avenue and 47th Street, with Chollas Parkway to the northwest of the site. The project site is adjacent to undeveloped land to the north and west that contains native and non-native vegetation. The site is also surrounded by existing residential and commercial development. The adjacent uses consist of open space, single-family residential communities to the north, west, and east of the site, and commercial development to the south along Fairmont Avenue and Federal Boulevard. Leisureland Mobile Homes is located north of the project and Webster Elementary School is located to the southeast.

Ambient Noise Conditions

The existing ambient noise environment in the project vicinity was surveyed on March 27 and 28, 2024. Meteorological conditions during the monitoring periods were consistent with seasonal expectations and appropriate for collection of usable noise level data.

Long-term (LT) noise monitoring (24-hour) was performed at one location in the project vicinity. Ambient noise levels recorded at the long-term noise monitoring location are presented in Table 5.10-2 and the location is shown in Figure 5.10-1, Noise Measurement Locations.

Table 5.10-2.
Summary of Long-Term Ambient Noise Measurements

Site	Location	L _{dn}	Average Noise Levels (dBA)							
			Daytime				Nighttime			
			L _{eq}	L _{max}	L ₅₀	L ₉₀	L _{eq}	L _{max}	L ₅₀	L ₉₀
LT1	North of Fairmount Ave., east of 47th St.	60	53	87	56	52	53	56	48	44

Source: Appendix G.

Notes: dBA = A-weighted decibels; L_{dn} = Day Night noise level; L_{eq} = average equivalent noise level; L_{max} = maximum noise level; L₅₀ = sound level exceeded 50% of the period; L₉₀ = sound level exceeded 90% of the period.

The primary noise source affecting the long-term noise monitoring location was vehicular traffic on the local roadway network. Additional noise sources experienced during the noise-monitoring were bird noise, distant dogs barking, intermittent adjacent truck operations, and heavy trucks loading nearby. During the long-term noise monitoring, the day-night (L_{dn}) noise level was approximately 60 dBA. The measured average long-term noise levels were approximately 53 dBA L_{eq} during the daytime and nighttime. The maximum sound levels reached were 87 dBA L_{max} during the daytime and 56 dBA L_{max} during the night.

Short-term (ST) noise monitoring was conducted at three locations (as shown on Figure 5.10-1; ST2 and LT1 share an approximate location), with results presented in Table 5.10-3, to further characterize noise levels generated by the existing ambient noise environment. As shown in Table 5.10-3, the three ST noise measurements documented average sound levels ranging from 44.9 dBA L_{eq} to 60.8 dBA L_{eq}, with maximum sound levels reaching 69.3 L_{max} at ST3.

Table 5.10-3.
Summary of Short-Term Ambient Noise Measurements

Site	Location	Time	Average Noise Levels (dBA)			
			L _{eq}	L _{max}	L ₅₀	L ₉₀
ST1	North of 47th Street, south of the Leisureland Mobile Homes	9:09 AM to 9:24 AM	44.9	50.3	42.3	39.9
ST2	On the eastern corner of the Fairmount Ave. and 47th St. intersection	9:28 AM to 9:43 AM	57.7	62.1	57.0	54.1
ST3	East of 47th St. and west of Webster Elementary School	9:44 AM to 9:59 AM	60.8	69.3	56.8	64.9

Source: Appendix G.

Notes: dBA = A-weighted decibels; L_{eq} = average equivalent noise level; L_{max} = maximum noise level; L₅₀ = sound level exceeded 50% of the period; L₉₀ = sound level exceeded 90% of the period.

Noise Sensitive Land Uses

Noise sensitive land uses (NSLUs) generally include uses where exposure to noise would result in adverse effects, as well as uses where a quiet environment is an essential element of the intended purpose of the use. Residential uses are considered an NSLU of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. There are several NSLUs located in the vicinity of the project, including residential single-family uses located on the northern/eastern side of 47th Street to the north and east, and Webster Elementary School to the southeast.

Vibration

Vibration from roadways is considered to be the primary source of groundborne vibration within the project area. Heavy truck traffic can generate groundborne vibration, which varies considerably depending on vehicle type, weight, and pavement conditions. However, groundborne vibration levels generated from vehicular traffic are not typically perceptible outside of the roadway right-of-way. There are no other significant sources of groundborne vibration within the project vicinity.

5.10.2 REGULATORY FRAMEWORK

Federal

Federal Noise Control Act of 1972

The U.S. Environmental Protection Agency (EPA) Office of Noise Abatement and Control was originally established to coordinate federal noise control activities. After its inception, the EPA's Office of Noise Abatement and Control issued the Federal Noise Control Act of 1972, establishing programs and guidelines to identify and address the effects of noise on public health, welfare, and the environment. In 1981, EPA administrators determined that subjective issues such as noise would be better addressed at more local levels of government. Consequently, responsibilities for regulating noise control policies were transferred to state and local governments in 1982. However, noise control guidelines and regulations contained in the EPA rulings in prior years are still adhered to by designated federal agencies where relevant. There are no federal noise regulations that are directly applicable to the construction or operation of the project.

State

California Department of Transportation - Vibration

In its *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020), the California Department of Transportation (Caltrans) recommends 0.5 ips PPV as a threshold for the avoidance of structural damage to typical newer residential buildings exposed to continuous or frequent

intermittent sources of groundborne vibration. For transient vibration events, such as blasting, the damage risk threshold would be 1.0 ips PPV (Caltrans 2020) at the same type of newer residential structures. For older structures, these guidance thresholds would be more stringent: 0.3 ips PPV for continuous/intermittent vibration sources, and 0.5 ips PPV for transient vibration events. With respect to human annoyance, Caltrans guidance indicates that building occupants exposed to continuous groundborne vibration in the range of 0.1 ips PPV (“strongly perceptible”) to 0.4 ips PPV (“severe”) would find it “annoying” at 0.2 ips PPV and “unpleasant” at the 0.4 ips PPV value. Although these Caltrans guidance thresholds are not regulations, they can serve as quantified standards in the absence of such limits at the local jurisdictional level.

Local

City of San Diego Municipal Code

The SDMC serves to further protect the welfare and the peace and quiet of the community through the establishment of both objective and subjective methods for determining non-compliance with the City noise regulations. The City has enumerated these standards and methods of enforcement in Chapter 5, Article 9.5. Relevant noise standards and thresholds are presented below (City of San Diego 2019).

- a. It shall be unlawful for any person to cause noise by any means to the extent that the one-hour average sound level exceeds the applicable limit given in the following Table 5.10-4, 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 5.10-4.
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

**Table 5.10-4.
Applicable Noise Limits**

Land Use	Time of Day	One-Hour Average Sound Level (dB)
Industrial or agricultural	Any time	75

Note: dB = decibels.

Source: City of San Diego 2019.

- b. The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts. Permissible construction noise level limits shall be governed by Sections 59.5.0404 of this article.
- c. Fixed-location public utility distribution or transmission facilities located on or adjacent to a property line shall be subject to the noise level limits of Part A. of this section, measured at or beyond six feet from the boundary of the easement upon which the equipment is located.

Section 59.5.0402 (b) Noise Ordinance, Motor Vehicles

Section 59.5.0402 (b) of the SDMC states that nothing in the Noise Ordinance section shall apply to authorized emergency vehicles when being used in emergency situations, including the blowing of sirens and/or horns.

Section 59.5.0404 Construction Noise

Section 59.5.0404 of the SDMC establishes the City's requirements specific to construction noise, as listed below.

- 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, 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 2024). 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. Table 5.10-5 reproduces Table NE-3 from the City's General Plan Noise Element.

Table 5.10-5
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
<i>Parks and Recreational</i>					
Parks, Active and Passive Recreation					
Outdoor Spectator Sports, Golf Courses; Water Recreational Facilities; Indoor Recreation Facilities					
<i>Agricultural</i>					
Crop Raising and Farming; Community Gardens, Aquaculture, Dairies; Horticulture Nurseries and Greenhouses; Animal Raising, Maintain and Keeping; Commercial Stables					
<i>Residential</i>					
Single Dwelling Units; Mobile Homes		45			
Multiple Dwelling Units*		45	45*		
<i>Institutional</i>					
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		

Table 5.10-5
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
Cemeteries						
<i>Retail Sales</i>						
Building Supplies/Equipment; Food, Beverages and Groceries; Pets and Pet Supplies; Sundries, Pharmaceutical, and Convenience Sales; Wearing Apparel and Accessories				50	50	
<i>Commercial Services</i>						
Building Services; Business Support; Eating and Drinking; Financial Institutions; Maintenance and Repair; Personal Services; Assembly and Entertainment (includes public and religious assembly); Radio and Television Studios; Golf Course Support				50	50	
Visitor Accommodations			45	45	45	
<i>Offices</i>						
Business and Professional; Government; Medical, Dental and Health Practitioner; Regional and Corporate Headquarters				50	50	
<i>Vehicle and Vehicular Equipment Sales and Services Use</i>						
Commercial or Personal Vehicle Repair and Maintenance; Commercial or Personal Vehicle Sales and Rentals; Vehicle Equipment and Supplies Sales and Rentals; Vehicle Parking						
<i>Wholesale, Distribution, Storage Use Category</i>						
Equipment and Materials Storage Yards; Moving and Storage Facilities; Warehouse; Wholesale Distribution						
<i>Industrial</i>						
Heavy Manufacturing; Light Manufacturing; Marine Industry; Trucking and Transportation Terminals; Mining and Extractive Industries						
Research and Development					50	
<i>Table Shading Key</i>						
	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.			

**Table 5.10-5
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
		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 2024.

* 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 5.10-4) 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 5.10-5), 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.

San Diego Fire Department Operations Manual

The City exempts noise generated by emergency sirens. The San Diego Fire Department Operations Manual Standard Instruction 01, Fire Suppression: Response Guidelines, Section IV.B. states that the California Vehicle Code Regulation 21055 – Exemption of Authorized Emergency Vehicles is “exempt from the rules of the road under all the following conditions:

b. if the driver of the vehicle sounds a siren as may be reasonably necessary...”

5.10.3 IMPACT ANALYSIS

5.10.3.1 Issue 1: Ambient Noise Levels

Issue 1: Would the project result or create a significant increase in the existing ambient noise levels?

Threshold

The City of San Diego has adopted their own California Environmental Quality Act (CEQA) Significance Determination Thresholds (City of San Diego 2022).

The City CEQA Significance Determination Thresholds address the following noise issues:

1. Interior and Exterior Noise Impacts from Traffic Generated Noise (Table 5.10-5 provides the general thresholds of significance for uses affected by traffic noise.)

Related to those issues, the City CEQA Significance Determination Thresholds discuss interior and exterior noise impacts from traffic generated noise; Housing and Urban Development (HUD) funded projects and noise; airport noise impacts; noise from adjacent stationary uses (noise generators); impacts to sensitive wildlife; temporary construction noise; and 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 updated its General Plan in 2024 (Blueprint SD) including the Noise Element. The City's most recent information is used for this analysis herein.

Per the City's CEQA Significance Thresholds, the following thresholds and context, categorized by noise sources or type of potentially impacted receptors, have been used in this analysis for identifying potentially significant noise impacts as a result of project implementation.

Exterior Noise Land Use Compatibility

The General Plan Noise Element was updated in July 2024 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). The Noise Element includes the noise compatibility guidelines presented above in Table 5.10-5. Impacts of the project on the environment would be significant if the project resulted in a perceptible change in noise level and the noise level exceeds the exterior noise land use compatibility guidelines.

Noise from Adjacent Stationary Uses (Noise Generators)

As detailed in the Section 5.10.2, 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 level at the property line should be the arithmetic mean of the decibel levels allowed for each use as set forth in SDMC Section 59.5.0401.

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 Section 5.10.2, Regulatory Framework, per SDMC Section 59.5.0404, 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 buildings occupants (Caltrans 2020). As for the receiving structure itself, Caltrans guidance provided in Section 5.10.2, Regulatory Framework, 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

Short-Term Construction

The project would generate noise associated with the operation of heavy construction equipment and construction related activities in the vicinity of the project area. Construction noise levels would fluctuate depending on the type, number, and duration of usage for the various pieces of equipment, as well as the relative exposure and distance between the source and receptors.

The effects of construction noise depend largely on the types of construction activities occurring on any given day, noise levels generated by those activities, distances to noise-sensitive receptors, and the existing ambient noise environment in the vicinity of the receiver. Construction generally occurs in several discrete and sequential phases, with each phase varying the equipment mix and the associated noise. These phases of onsite project construction activities thus temporarily alter the characteristics of the outdoor ambient noise environment on the project site and in the surrounding community for the duration of construction progress.

The site preparation and grading stages typically generate the most substantial noise levels due to onsite equipment grading and excavating activities, which often uses the loudest mix of construction equipment. Specific site preparation equipment can include backhoes, loaders, and excavation equipment such as graders. Table 5.10-6 below lists the maximum noise levels typically generated by various types of common heavy construction equipment.

**Table 5.10-6.
Typical Construction Equipment Maximum Noise Levels**

Equipment Type	Maximum Noise Levels, L_{max} (dBA) at 50 feet
Air Compressor	80
Asphalt Paver	80
Backhoe	80
Compactor	82
Concrete Pump	90
Concrete Saw	85
Crane, Mobile	85
Dozer	85
Forklift	85
Front-End Loader	80
Generator	82
Grader	85
Paver	85
Pneumatic Tools	85
Rock Drill	85

Table 5.10-6.
Typical Construction Equipment Maximum Noise Levels

Equipment Type	Maximum Noise Levels, L_{\max} (dBA) at 50 feet
Roller	85
Scraper	85
Trucks	84
Water Pump	84
Welder	84

Source: DOT 2006, FHWA 2008, FTA 2018.

Notes: dBA = A-weighted decibels; L_{\max} = maximum noise level; all equipment fitted with a properly maintained and operational noise control device, per manufacturer specifications.

To assess noise levels associated with the various equipment types and their operation, construction equipment can be considered to operate in two modes, mobile and stationary. Mobile equipment sources move around a construction site performing tasks in a recurring manner (e.g., loaders, graders, dozers). Stationary equipment operates in a location for an extended period to perform continuous or periodic operations (e.g., compressor or generator). Thus, it is necessary to determine the location of stationary sources during specific stages of construction, and the effective acoustical center of operations for mobile equipment during various stages of the construction process. The effective acoustical center is the idealized point from which the energy sum of all construction activity noise near and far would appear to originate. As one increases the distance between equipment and/or between areas with simultaneous construction activity, dispersion and distance attenuation reduce the effects of separate noise sources added together.

A Microsoft Excel-based noise prediction model was used to estimate construction noise levels. Input variables for the predictive modeling consist of the equipment type and number of each, the acoustical usage factor, the expected duration (in hours) of onsite activity, the distance from the receiver, and the construction schedule for the consideration of concurrent construction activities. Conservatively, no topographical or structural shielding was assumed in the modeling. The construction scenario assumptions are shown in Table 5.10-7.

**Table 5.10-7.
Project Construction Equipment Roster**

Construction Phase	One-Way Vehicle Trips			Equipment		
	<i>Average Daily Worker Trips</i>	<i>Average Daily Vendor Truck Trips</i>	<i>Daily Haul Truck Trips</i>	<i>Equipment Type</i>	<i>Qty.</i>	<i>Usage Hours</i>
Site Preparation (20 days)	6	2	2	Graders	1	8
				Tractors/Loaders/Backhoes	1	8
Grading (280 days)	12	4	8	Graders	1	6
				Rubber Tired Dozers	1	6
				Tractors/Loaders/Backhoes	1	7
Building construction (380 days)	30	6	0	Cranes	1	4
				Forklifts	2	6
				Tractors/Loaders/Backhoes	2	8
Paving (20 days)	18	2	0	Cement and Mortar Mixers	4	6
				Pavers	1	7
				Rollers	1	7
				Tractors/Loaders/Backhoes	1	7
Architectural coating (10 days)	4	2	0	Air compressors	1	6

Source: Appendix C.

Using the construction information in Table 5.10-7, predicted construction noise levels at the nearest noise-sensitive receptor (the single-family residences to the east of the project) are summarized in Table 5.10-8 below. The two calculation scenarios are as follows:

- Usage of the shortest activity-to-receptor distance for all equipment in a construction phase; and
- An “acoustic centroid” approach, akin to the Federal Transit Administration (FTA) general assessment technique for estimating construction noise, whereby all listed equipment for a construction phase is represented by a common location at the geographic center of the studied construction zone or area.

The first of these methods is considered a conservative approach to assess what might be characterized as a peak exposure level, applicable to not more than approximately 10%–15% of the total construction period and when the studied construction activity is taking place with the loudest equipment along the property boundary closest to these nearest off-site receivers. The second approach uses the acoustic centroid technique to represent a time-averaged location for the phase

equipment and activity, thereby yielding average noise levels to represent overall noise exposure as experienced for adjacent receivers over the duration of each construction phase. Appendix G displays the construction noise model worksheets for each of these analysis approaches.

Although the quantities and types of equipment per construction phase are the same in each of the two approaches, due primarily to the differences in source-to-receptor distance variables, Table 5.10-8 shows predicted construction noise levels of both scenarios by individual construction phase.

**Table 5.10-8.
Predicted Construction Noise Levels per Construction Activity Phase**

Construction Phase (and Equipment Types Involved)	Closest Distance to Nearest Noise Sensitive Receptor	Acoustic Center to Nearest Noise Sensitive Receptor
	12-hour L_{eq} , dBA	12-hour L_{eq} , dBA
Site Preparation (Grader, Backhoe)	74.7	67.1
Grading (Grader, Dozer, Backhoe)	75.1	67.5
Building Construction (Crane, Lift, Backhoe)	71.4	63.8
Paving (Mixer Truck, Paver, Roller, Backhoe)	74.9	67.3
Architectural Coating (Air Compressor)	65.7	58.1

Source: Appendix G.

Notes: L_{eq} = equivalent noise level; dBA = A-weighted decibels.

As presented in Table 5.10-8, the estimated construction noise exposure levels are not predicted to exceed 75 dBA L_{eq} over a 12-hour period at the nearest noise-sensitive receptors under either approach.

The application of construction BMPs during project construction would further reduce noise levels at nearby sensitive receptors. BMP's may include pro-active public relations such as: clear and abundant notices or alerts of potentially noisy construction activity well in advance of actual work periods; and special consideration for selected receptors that may be closest to project activities or otherwise at risk of greatest adverse effects (with respect to noise and other topics, such as traffic interruption). In addition, construction activities would adhere to the SDMC (Section 59.5.0404) allowable hours and days of construction between 7:00 a.m. to 7:00 p.m. Monday through Saturday. Construction would not be permitted on legal holidays as specified in SDMC Section 21.04, with the exception of Columbus Day and Washington's Birthday.

Therefore, temporary construction-related noise impacts at nearby residential receptors would not exceed the City's threshold of 75 dBA L_{eq} at a residentially zoned receptor and impacts would be considered less than significant.

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.”

The main concern associated with ground-borne vibration is annoyance; however, in extreme cases, vibration can cause damage to buildings, particularly those that are old or otherwise fragile. Some common sources of ground-borne vibration are trains, and construction activities such as blasting, pile-driving, and heavy earth-moving equipment. The primary source of ground-borne vibration occurring as part of the project is construction activity. The project does not require blasting or pile driving for construction.

According to Caltrans, D-8 and D-9 Caterpillars, earthmovers, and trucks, such as those expected to be used during project construction, have not exceeded 0.10 ips PPV at 10 feet (Caltrans 2020). Since the closest off-site residence is located approximately 70 feet away from likely heavy construction equipment, vibration from construction activities at the closest sensitive receiver would not exceed the significance threshold of 0.20 ips PPV.

Operationally, vibration associated with fire station activities would primarily be attributed to vehicle traffic. However, as stated in the FTA guidance: “If the roadway is fairly smooth, the vibration from rubber-tired traffic is rarely perceptible” and “buses and trucks rarely create vibration that exceeds 70 VdB unless there are bumps due to frequent potholes in the road” (FTA 2018). Therefore, construction and operation vibration impacts due to the project would be less than significant.

Noise Impacts to Biological Resources

The City’s MSCP is implemented through the MSCP Subarea Plan (City of San Diego 1997). The MSCP established a 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.

Effects from short-term construction and long-term operational noise on covered species that have a moderate to high potential to forage, roost, and nest in the project study area may occur. Covered species with potential to occur in the project study area include California gnatcatcher, least Bell's vireo, Cooper's hawk, and southwestern willow flycatcher (Appendix D). These effects are most severe during the breeding season, as they may negatively affect species' ability to reproduce.

As noted in Section 5.4, Biological Resources, 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 LUAG 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 Leq. If coastal California gnatcatchers are present in these areas, then no clearing, grubbing, or grading of occupied California gnatcatcher habitat shall be permitted during the breeding season. 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 Leq, or noise attenuation measures shall be provided, along with a noise model documenting noise levels 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 described in Section 5.4.

Mitigation would be required for indirect noise impacts to least Bell's vireo, which have the potential to be present in riparian habitat adjacent to the project footprint. Should work be proposed to occur during this species' breeding season (March 15 to September 15), compliance with the California Fish and Game Code Section 3503.5 would avoid any impacts to Cooper's hawk. With implementation of these measures described in Section 5.4, the project would avoid adverse effects of excessive noise on sensitive species during the breeding season in compliance with the City's MSCP LUAG.

Long-term operational noise is primarily oriented to the south, because of walls and grading that separate the proposed building from the MHPA to the north. Consistent operational noise such as roof-mounted air conditioning units are expected to emit minimal noise and be consistent with the existing urban environmental setting. Sporadic noise from the emergency generator, sirens, and other infrequent noise emitters are not expected to result in consistently elevated noise levels that would substantially change overall noise levels within the adjacent MHPA. As such, the project would comply with the City's MSCP LUAG related to noise and impacts to protected biological resources would be less than significant.

Long-Term Operation Noise

Operational Noise Exposure

The proposed fire station would be served by an emergency generator, transformer, and roof-mounted heating, ventilation, and air conditioning (HVAC) equipment that includes outdoor-exposed packaged air-handling units and air-cooled condensers that provide the expected cooling demand (expressed as refrigeration “tonnage”) for a building. The emergency generator would be enclosed with solid masonry walls 16 feet in height and would run once a week, typically after 7 am, to ensure they are functional and in the event of a power outage. The primary source of operational noise generated by the project would be from the emergency generator.

Based on the modeling, operational noise generated by the project is predicted to be up to 40 dBA L_{eq} at the nearby residential land use and is therefore expected to be lower than and thus comply with the City’s 50 dBA L_{eq} daytime threshold and 40 dBA L_{eq} nighttime threshold for single-family residential land uses. Reference sound level calculations and detailed information can be found in Appendix G.

The project may feature other noise emitters, such as people talking outside, the hum of an electrical box, or car doors opening and closing, but their contributions would tend to be sporadic or otherwise occur infrequently and thus be expected to have no greater acoustic contribution to an hourly L_{eq} than the continuous-type HVAC noise studied herein. Therefore, as operational noise generated by the project would not exceed the City’s 50 dBA L_{eq} daytime threshold and 40 dBA L_{eq} nighttime threshold for single-family residential land uses, impacts associated with operational noise exposure would not exceed the City’s thresholds.

Significance of Impact

Construction

Short-Term Construction Noise

As discussed above, the estimated construction noise exposure levels are not predicted to exceed 75 dBA L_{eq} over a 12-hour period at the nearest noise-sensitive receptors. The application of construction BMPs during project construction would further reduce the noise level at nearby sensitive receptors. Impacts would be **less than significant**.

Groundborne Vibration

As stated above, D-8 and D-9 Caterpillars, earthmovers, and trucks have not exceeded 0.10 ips PPV at 10 feet and thus would be no greater than the annoyance threshold recommended by Caltrans. Impacts would be **less than significant**.

Noise Impacts to Biological Resources

As stated above, the project would be required to demonstrate compliance with the City's MSCP LUAG, which would provide a further reduction in indirect noise impacts to biological resources within the MHPA during construction of the project. Long-term operational noise would be minimal and would not substantially change overall noise levels within the MHPA adjacent to the project site. 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**.

Operational

On-Site Stationary Operations

Operational noise generated by the project would not exceed 40 dBA Leq and thus would be compliant with the City's nighttime threshold of 40 dBA hourly Leq and the City's daytime threshold of 50 dBA Leq. Impacts would be **less than significant**.

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 than the aforementioned threshold to annoy occupants of such structures; thus, vibration damage risk to nearby structures is considered **less than significant**.

Mitigation

No mitigation would be required.

5.10.3.2 Issue 2: Adopted Noise Ordinance

***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**

Threshold

Refer to Section 5.10.3.1

Impact

Refer to Section 5.10.3.1

¹ Table K-4 has been superseded. The updated land use noise compatibility table is included as Table 5.10-5.

Significance of Impact

Temporary construction-related noise impacts at nearby residential receptors would not exceed the City's threshold of 75 dBA L_{eq} at a residentially zoned receptor. Operational noise generated by the project would not exceed the City's 50 dBA L_{eq} daytime threshold and 40 dBA L_{eq} nighttime threshold for single-family residential land uses. Additionally, the project would not introduce a new residential population. Thus, the project would not result in exposure of people to noise levels in excess of the City's adopted noise standards. Impacts would be **less than significant**.

Mitigation

No mitigation would be required.

5.10.3.3 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 Transportation Element of the General Plan or an adopted airport Comprehensive Land Use Plan?*

Threshold

The City's Significance Determination Thresholds (2022) identify potentially significant impacts related to future transportation noise levels if a project would exceed thresholds listed below. As shown in Table 5.10-9, the traffic noise level at exterior usable open space for single- and multifamily residences as well as parks should not exceed 65 dBA (City of San Diego 2022). 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) (e.g., 65 dBA daytime for single-family residential land uses). An increase of 3 dBA is perceived by the human ear as a barely perceptible increase.

**Table 5.10-9.
City of San Diego Traffic Noise Significance Thresholds**

Structure of Proposed Use That Would Be Impacted by Traffic Noise	Interior Space	Exterior Useable Space ¹	General Indication of Potential Significance ²
Single-family detached	45 dB	65 dB	Structure or outdoor useable area is <50 feet from the center of the closest (outside) lane on a street with
Multi-family, school, library, hospital, day care center, hotel, motel, park, convalescent home	City of San Diego Environmental Designee (ED) ensures 45 dB	65 dB	

**Table 5.10-9.
City of San Diego Traffic Noise Significance Thresholds**

Structure of Proposed Use That Would Be Impacted by Traffic Noise	Interior Space	Exterior Useable Space¹	General Indication of Potential Significance²
	pursuant to Title 24		existing or future ADTs >7,500
Office, church, business, Professional uses	n/a	70 dB	Structure or outdoor useable area is <50 feet from the center of the closest lane on a street with existing or future ADTs >20,000
Commercial, retail, industrial, outdoor sports uses	n/a	75 dB	Structure or outdoor useable area is <50 feet from the center of the closest lane on a street with existing or future ADTs >40,000

Source: City of San Diego 2022.

Notes: ADT = average daily traffic

- ¹ Exterior usable areas do not include residential front yards or balconies, unless the areas such as balconies are part of the required usable open space calculation for multifamily units.
- ² If a project is currently at or exceeds the significance thresholds for traffic noise described above, and noise levels would result in less than a 3 dB increase, then the impact is not considered significant.

Impact

According to acoustical principles, the increase in traffic noise level relates directly to the increase in traffic volumes. The project would therefore have to roughly double traffic volumes on nearby roadway segments to increase traffic noise by 3 dBA, which would be considered a barely perceptible increase (Caltrans 2013).

The project would result in the creation of additional vehicle trips on local roadways (i.e., 47th Street and Fairmount Avenue), which could result in increased traffic noise levels at adjacent noise-sensitive land uses. The total daily trips generated by the project is estimated to be 230 PCE vehicles (Appendix B). According to the SANDAG, average daily traffic (ADT) for Fairmount Avenue is approximately 9,100 vehicles and 1,200 for 47th Street. Comparing the maximum number of daily project trips (230 PCE) to the average daily traffic volume of the lowest-volume street (1,200 vehicles on 47th Street), the

additional vehicle trips would amount to an increase of approximately 19%. Based upon the fundamentals of acoustics, a doubling (i.e., a 100% increase) would be needed to result in a 3-dB increase in noise levels, which is the level corresponding to an audible change to the typical human listener. An increase in traffic volumes on the order of 19% (all other things being equal) would amount to an increase of approximately 0.76 dB.

As noted in Section 5.10.2, Regulatory Framework, noise produced by emergency vehicle sirens is exempt from city sound level limits. Further, the San Diego Fire Department Operations Manual clarifies the exemption through the California Vehicle Code Regulation 21055, which exempts emergency vehicle drivers from all rules of the road if the driver of the vehicle sounds a siren as may be reasonably necessary. In practice, the sirens are not automatically turned on and are subject to the discretion of the driver. Drivers may take into account the setting (for example, residential areas during nighttime hours) while maintaining safety when making the decision to turn on the emergency siren (City of San Diego Fire-Rescue Department 2024).

Therefore, traffic related to project activities would not result in exposure of people to transportation noise levels in excess of City standards.

Significance of Impact

The addition of project traffic to the roadway network would result in an 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** is expected for project-related off-site traffic noise increases affecting existing residences in the vicinity.

Mitigation

No mitigation would be required.

5.11.3.4 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 (CLUP)?*

Threshold

The City's Significance Determination Thresholds (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 will 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 City of San Diego Environmental Designee (ED) and do not need to be mitigated through conditions in the environment report, but the BDR requirements should be noted. BDR 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. 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 dBA 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

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 or within an AEOZ. The project also does not propose adding a new residential population to the area. The nearest airport is the San Diego International Airport, located approximately 4.7 miles west of the project site. The project site is within the Airport Influence Area of San Diego International Airport within Review Area 2 which addresses airspace protection and/or overflight notification primarily related to building heights. The project site is not within the 60 dBA CNEL contour shown in the San Diego International Airport Land Use Compatibility Plan (San Diego County Regional Airport Authority 2025).

Significance of Impact

The project site is not located within an AEOZ and is not within a 60 dBA CNEL contour and would not subject fire station employees to noise levels associated with an airport to above 65 dBA CNEL levels; therefore, **no impact** would occur.

Mitigation

No mitigation would be required.



SOURCE: RRM Design 2024; SANGIS 2023, 2024

FIGURE 5.10-1
Noise Measurement Locations
 Fairmount Avenue Fire Station

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SOURCE: Google 2025

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5.11 PALEONTOLOGICAL RESOURCES

This section describes the existing paleontological resource conditions of the proposed Fairmount Avenue Fire Station Project (project) site, identifies associated regulatory requirements, and evaluates potential impacts related to implementation of the project.

The following discussion is based on the geotechnical investigation prepared by SCST, LLC, an Atlas Company (March 2019) and included as Appendix E.1. In addition, an update to the geotechnical investigation has been prepared, which is included as Appendix E.2 (February 2020). A letter providing responses to geotechnical issues provided by the City of San Diego (City) was prepared by Atlas Technical Consultants (formerly SCST) and is included as Appendix E.3 (August 2021). The San Diego Natural History Museum (SDNHM) paleontological records search results letter is included as Confidential Appendix H.

5.11.1 EXISTING CONDITIONS

Physical Conditions

Under existing conditions, the project site consists of sloping, undeveloped land covered in vegetation. The San Diego Formation (see description below) was exposed encountered as shallowly as 2 feet below the ground surface in the southcentral portion of the project site (Appendix E.2). The site generally slopes downward towards the north and west. Site elevations range from approximately 194 feet amsl at the upper southeastern portion of the site down to 140 feet amsl at the northern portion of the site.

Geologic Units Underlying the Project Area

Geological mapping of the project site by Kennedy and Tan (2008) and the SDNHM paleontological records search results indicate that the site is underlain by the early Pleistocene to late Pliocene (approximately 1.5 million years ago to 3 million years ago) San Diego Formation (map unit Tsdss). According to the site-specific geotechnical investigations (Appendix E.1 and E.2), which included exploring the ground subsurface through geotechnical test pits and trenching, the project site is underlain by undocumented fill/alluvium (undifferentiated), middle to early Pleistocene (approximately 129,000 years ago to 2.58 million years ago) very old paralic deposits (map unit Qvop), and the early Pleistocene to late Pliocene San Diego Formation (map unit Tsdss) (Appendix E.1 and E.2). The listed geologic units and their paleontological sensitivities are summarized below.

Undocumented Fill/Alluvium

The geotechnical report considered the fill and alluvium undifferentiated due to similarities in characteristics. The fill and alluvium were encountered at the ground surface in each of the test pits and extended to depths ranging from about 1 to 12 feet below the existing ground surface. According to the City's 2022 Thresholds, alluvium has a low paleontological sensitivity rating. Undocumented fill has not been given a paleontological sensitivity rating by the City and monitoring is not required when grading documented or undocumented artificial fill; thus, it is assumed that this geologic unit has a low sensitivity rating (City of San Diego 2022).

Very Old Paralic Deposits

Very old paralic deposits were encountered beneath the undocumented fill in one of the test pits located in the southeast corner of the site, which extended from approximately 2 feet below ground surface to the total depth explored of about 3 feet below ground surface and consisted of hardened sandy claystone (Appendix E.2). Very old Paralic Deposits are equivalent to the Lindavista Formation of Kennedy and Tan (1977) and have been assigned a high paleontological sensitivity rating in nearby Mira Mesa and Tierrasanta (both located along Interstate 15 north of the project site) and a moderate paleontological sensitivity rating in all other areas where the geological unit occurs, according to the City's Paleontology Guidelines (City of San Diego 2022).

San Diego Formation

The San Diego Formation is mapped at the surface within the project area according to Kennedy and Tan (2008) and was encountered beneath the undifferentiated fill/alluvium in most of the geotechnical test pits and extended to the maximum depths explored of about 3 to 12½ feet below ground surface (Appendix E.1 and E.2). The San Diego Formation consists of weakly to strongly cemented, silty sandstone and clayey sandstone, and hardened sandy claystone. The San Diego Formation has been given a high paleontological sensitivity rating (City of San Diego 2022).

Records Search Results

A paleontological records search was requested from SDNHM on April 1, 2024, and the results were received on April 15, 2024. Although no previous fossil localities have been reported from within the project site, 16 localities were reported within 1 mile of the project site from the San Diego Formation. These localities yielded the following fossils: marine invertebrates (bryozoans, clams, scallops, mussels, oysters, snails, sand dollars, barnacles, and crabs), marine vertebrates (rays, toothed whales, baleen whales, eared seals, and albatrosses), and terrestrial vertebrates (rabbits) (Confidential Appendix H). One locality from the Pleistocene Lindavista Formation, time equivalent to the very old paralic deposits, was also reported within 1-mile of the project site.

5.11.2 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 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

City of San Diego General Plan

The City of San Diego General Plan does not include any goals or policies related to paleontological resources. However, specific Thresholds of Significance have been outlined for paleontological resources (City of San Diego 2022).

Mid-City Communities Plan

The MCCP includes one goal specific to preserving and protecting paleontological resources.

Goal

- Preserve areas of Mid-City possessing significant archaeological and paleontological interest.

City of San Diego Municipal Code – Paleontological Resources Requirements for Grading Activities

The City's Municipal Code includes specific requirements for grading activities that address the potential to unearth paleontological resources during construction activities. Chapter 14, Article 2, Division 1 of the City's Municipal Code 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 [San Diego Municipal Code] 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 fossil remains are contained in underlying formations and geologic rock units, 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 (City of San Diego 2022). The resource sensitivity and ratings are provided below under "Thresholds".

5.11.3 IMPACTS ANALYSIS

5.11.3.1 Issue 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 (QIn, QLB) occurring in Mira Mesa/Tierrasanta, Lusardi Formation (KI) occurring within Black Mountain Ranch/Lusardi Canyon Poway/Rancho Santa Fe, Mission Valley Formation (TMV), Mt. Soledad Formation (Tm, Tmss, Tmssc) 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 (QIn, QLB), Lusardi Formation (KI), Mt. Soledad Formation (Tm, Tmss, Tmssc), Pomerado Conglomerate (Tp), River/Stream Terrace Deposits (Qt) occurring in South Eastern/Chollas Valley/Fairbanks Ranch/Skyline/Paradise Hills/Otay Mesa, Nestor/San Ysidro, and Santiago Peak Volcanics (Jsp) occurring in Black Mountain Ranch/La Jolla Valley, 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 low sensitivity.

Impacts

The project site is mapped as being underlain by the San Diego Formation; however, geotechnical test pits indicated the project site is underlain by undifferentiated fill/alluvium, very old paralic deposits (broadly equivalent to the Lindavista Formation), and the San Diego Formation (Appendix E.1 and E.2). The undifferentiated fill/alluvium has zero to low paleontological sensitivity rating, the very old paralic deposits have a moderate paleontological sensitivity rating, and the San Diego Formation has a high paleontological resource sensitivity rating. The project would require a net export of 3,785 cubic yards of soil, with a maximum excavation depth of 20 feet (Appendix E.2), thereby exceeding the excavation parameters of the threshold for geological units with moderate and high paleontological sensitivity. It is likely that high-sensitivity formations would be encountered at the surface in some areas of the project site, with the potential to impact the San Diego Formation.

Given the underlying paleontologically sensitive deposits and depth of proposed construction-related excavation activities, the project site has the potential to yield scientifically significant paleontological resources. The project is subject to compliance with the City's grading ordinance (SDMC Section 142.0151) and the requirement for paleontological monitoring, which would be made a condition of project approval. Additionally, the project would be required to comply with the City's Paleontological Guidelines identified in Appendix P of the Land Development Manual. Project construction would also be subject to the Whitebook Section 6-6.2.2, Paleontological Monitoring Program.

Significance of Impact

Paleontological monitoring conducted in accordance with the Municipal Code and Appendix P of the Land Development Manual would ensure no significant impact would occur; no mitigation would be required. Impacts would be **less than significant**.

Mitigation

No mitigation would be required.

5.12 HISTORICAL RESOURCES

This section describes the existing historical resource conditions of the Fairmount Avenue Fire Station Project (project) site, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if applicable, related to implementation of the project.

The following analysis is based on the Cultural Resources Phase I Inventory Letter Report, prepared by Dudek (September 2024) included as Appendix I.

5.12.1 EXISTING CONDITIONS

Physical Conditions

The project area of potential effect (APE) consists of all areas subject to project impact activities, including ground and foundation preparation, utility installation, framing and assembly of the building and associated apparatus bay, grading and paving the parking lot and driveway areas, vegetation removal, and landscaping. The project APE consists of the 1.28-acre project site which includes an undeveloped parcel (Accessors Parcel Number (APN) 541-190-16) that contains a variety of native and non-native vegetation in addition to the project's offsite improvements. The offsite improvements consist of a new 22-foot-wide driveway apron and new 40-foot-wide driveway apron, and new crosswalk, concrete curb cut, and electrical power pole that comprise 0.08-acres within the existing 47th Street right-of-way. In addition, a 0.52-acre temporary offsite construction staging area is located south of Sunshine Beradini Park and north of Federal Boulevard. The total APE is 1.88-acres including the project site and the offsite improvements. Some portions of the project APE have been previously disturbed due to development of 47th Street and Fairmount Avenue, and adjacent residential and commercial development.

The project APE is surrounded by residential developments to the east and north, open space to the north and west, industrial uses and a school to the southeast. The North Fork of Chollas Creek is located approximately 300 feet northwest of the project APE.

Cultural Setting

Evidence for continuous human occupation in the San Diego region spans the last 10,000 years. Various attempts to parse out variability in archaeological information 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 trends in archaeological collections, 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 I of this EIR.

California Historical Research Information System Records Search Results

A California Historical Research Information System (CHRIS) records search was conducted using information from the South Coastal Information Center (SCIC) by Dudek on February 23, 2018. The search encompassed the project APE and a one-mile buffer around the project APE. In addition to a review of previously prepared 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 APE. However, 44 previously recorded cultural resources were identified within one-mile of the project APE, listed in Table 5.12-1. Of the 44 cultural resources identified, six are prehistoric resources, including one habitation/midden site, one shell scatter, and four lithic sites. The remaining 38 are historic period resources including 26 residential properties, seven trash deposits, three commercial buildings/structures, and one recorded resource which includes a series of historic sidewalk stamps identified in the vicinity. No historic properties are located within the project APE or within the 1-mile of the project APE.

**Table 5.12-1.
Previously Recorded Cultural Resources in the One-Mile Record Search Radius**

Primary Number	Trinomial (CA-)	Age	Description	Eligibility for CRHR
<i>Outside the Project APE</i>				
37-005580	SDI-005580	Historic	Adobe Remains	Not evaluated
37-010528	SDI-010528	Historic	Multiple Trash deposits/scatters	Not Evaluated
37-013002	SDI-013002	Prehistoric	Habitation Site with Midden	Not Evaluated
37-013003	SDI-013003	Prehistoric	Lithic artifact scatter	Not Evaluated
37-014493	—	Historic	Historic Police Range/ Structures	Not Evaluated
37-014494	SDI-014162	Prehistoric	Lithic Scatter	Not Evaluated
37-014495	SDI-014163	Historic	Trash Deposit	Not Evaluated
37-014496	SDI-014164	Historic	Trash Deposit	Not Evaluated
37-014497	SDI-014165	Historic	Trash Deposit	Not Evaluated
37-014498	SDI-014166	Prehistoric	Lithic Procurement & Scatter	Not Evaluated
37-014499	SDI-014167	Prehistoric	Lithic Procurement & Scatter	Not Evaluated
37-024259	—	Historic	Trash Deposit	Not Evaluated

**Table 5.12-1.
Previously Recorded Cultural Resources in the One-Mile Record Search Radius**

Primary Number	Trinomial (CA-)	Age	Description	Eligibility for CRHR
<i>Outside the Project APE</i>				
37-027548	—	Historic	Multi-family Property	Ineligible
37-027558	—	Historic	Single Family Property	Ineligible
37-027554	—	Historic	Single Family Property	Ineligible
37-027557	—	Historic	Single Family Property	Ineligible
37-027549	—	Historic	Single Family Property	Ineligible
37-027550	—	Historic	Single Family Property	Ineligible
37-027551	—	Historic	Multi-family Property	Ineligible
37-027552	—	Historic	Single Family Property	Ineligible
37-027553	—	Historic	Single Family Property	Ineligible
37-027555	—	Historic	Single Family Property	Ineligible
37-027556	—	Historic	Single Family Property	Ineligible
37-027559	—	Historic	Multi-family Property	Ineligible
37-027560	—	Historic	Single Family Property	Ineligible
37-027561	—	Historic	Single Family Property	Ineligible
37-027562	—	Historic	Single Family Property	Ineligible
37-027563	—	Historic	Single Family Property	Ineligible
37-027564	—	Historic	Single Family Property	Ineligible
37-027565	—	Historic	Single Family Property	Ineligible
37-027566	—	Historic	Single Family Property	Ineligible
37-027568	—	Historic	Multi-family Property	Ineligible
37-027564	—	Historic	Single Family Property	Ineligible
37-027570	—	Historic	1-Story Commercial Building	Ineligible
37-027587	—	Historic	Single Family Property	Ineligible
37-027591	—	Historic	Single Family Property	Ineligible
37-027592	—	Historic	Single Family Property	Ineligible
37-031588	—	Historic	Trash Deposit	Not Evaluated
37-031589	SDI-020038	Prehistoric	Shell Scatter	Not Evaluated
37-032340	SDI-020506	Historic	Trash Deposit	Not Evaluated
37-033515	—	Historic	Sidewalk Stamps	Not Evaluated
37-035416	—	Historic	Unimproved Property	Ineligible
37-035944	—	Historic	Holy Cross Cemetery & Mausoleum	Appears Eligible
37-035945	—	Historic	Single Family Property	Ineligible

Source: Appendix I.

Previous Studies

The records search indicates that 95 previous studies have been conducted within one-mile of the project APE. Of the 95 studies, four studies intersect the project APE: SD-03604, SD-11826, SD-12200, and SD-16427,

as shown in Table 5.12-2. None of the four studies identified any cultural resources within the project APE. Based on these previous studies, the entire project APE (100%) has been previously studied.

**Table 5.12-2.
Reports Intersecting Project APE**

Report Number	Authors	Date	Title
SD-03604	CITY OF SAN DIEGO, DEVELOPMENT SERVICES	1999	CULTURAL RESOURCES INVENTORY OF THE MAY PROPERTY AT FAIRMONT AVENUE AND 47TH STREET, CITY OF SAN DIEGO, CALIFORNIA APN NO. 541-190-16-00
SD-11826	AFFINIS	2008	ARCHAEOLOGICAL RESOURCES ANALYSIS FOR THE MASTER STORMWATER SYSTEM MAINTENANCE PROGRAM, SAN DIEGO, CALIFORNIA PROJECT. NO. 42891
SD-12200	CITY OF SAN DIEGO DEVELOPMENT SERVICES DEPARTMENT	2009	DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE MASTER STORM WATER SYSTEM MAINTENANCE PROGRAM (MSWSMP)
SD-16427	CALTRANS	1987	ARCHIE MOORE HOME, 3517 E STREET, SAN DIEGO, CA 92102

Source: Appendix I.

Historic Aerial Review

Historic maps and aerial photographs were reviewed to understand development of the project APE and surrounding properties. Historic aerial photographs of the project APE were available for between 1953 and 2020 (NETR 2023). The 1953 aerial photograph reveals that portions of the project APE had been disturbed due to construction of 47th Street and the surrounding area was starting to be developed with residential properties. By 1964, the aerial imagery shows grading and commercial development immediately south of the project APE, where the Reddaway Trucking Company is currently located, and an increase in residential development to the northwest of the APE. The 1966 aerial shows mass grading for residential development (structures and roads) to the north of the project APE, where the Leisureland Mobile Homes is currently located. No substantial changes are observed within the project APE and the surrounding area in the following aerials from 1980 to 1985.

By 1986, there is some vegetation removal and light grading along the intersection of Chollas Parkway and 47th Street, along the northern section of the project APE. Additional grading is observed in the 1987 aerial imagery at the intersection of Chollas Parkway and 47th Street. On the 1988 aerial, some vegetation clearing is observed within the northern and southern sections of the project APE. By 1990, the aerial imagery reveals that a majority of the vegetation within the project APE had been cleared. The 1993 aerial photograph reveals mass grading within the southern section of the project APE, and immediately south of the project APE for the expansion of Fairmont Avenue to 47th Street. By 1994, the northern portion of 47th

Street near Chollas Parkway had been graded. Additionally, there is evidence of grading within the southern section of the project APE and immediately south of the project APE. The 1996 aerial imagery reveals vegetation removal throughout a majority of the project APE. No substantial changes are observed within the project APE and the surrounding area in the aerials from 1997 to 2016.

The aerial imagery from 2019 reveals a cleared dirt pathway within the project APE, and two small areas within the eastern section of the APE where two utility poles currently exist. The 2020 aerial imagery represents the current conditions of the project APE. No historic age structures are present within the project APE. The review of the historic aerials reveals that the project APE has undergone some grading during the construction of 47th Street, Fairmount Avenue, and the adjacent residential development, especially near the eastern and southern portions of the project APE; however, the project site has remained undeveloped.

The historic topographic (topo) maps of the project APE were reviewed (earliest map available is 1904). The 1904 topo map and subsequent topo maps shows Chollas Creek to the northwest of the project APE, and 47th Street is first observed on the 1944 topo map. A review of the topo maps did not identify historic age structures within the project APE.

Native American Heritage Commission Sacred Lands File Search

The Native American Heritage Commission (NAHC) was contacted for a Sacred Lands File (SLF) search on October 27, 2023 (Appendix I). The SLF consists of a database of known Native American resources that may not be included in the SCIC database. The NAHC SLF results were received on November 27, 2023, and the results were negative. The NAHC additionally provided a list of Native America tribes and individuals/organizations with traditional geographic associations that might have knowledge of cultural resources in this area. Dudek mailed outreach letters on November 29, 2023, to all Native American representatives included on the NAHC contact list. One response has been received to date. The Baraona Band of Mission Indians responded on December 15, 2023 stating that they are not aware of any specific cultural resources on the project site, however, the site is along a watercourse that is a tributary to the San Diego River in Mission Valley, where ancestors of the Barona Band lived in pre-contact times, which increases the likelihood that cultural resources are present on or below the surface of the site and wish to have a qualified archaeologist walk the site to determine if there is any indication of surface or buried cultural resources before any ground disturbance occurs.

Refer to Section 5.15, Tribal Cultural Resources, of this EIR for a discussion related to potential impacts on tribal cultural resources.

Intensive Pedestrian Survey

Dudek archeologists conducted intensive pedestrian surveys on November 8, 2023 and September 9, 2024, employing standard archaeological procedures and techniques consistent with the Secretary of the Interior Standards for a cultural resources inventory. Kumeyaay Native American monitors from Red Tail Environmental were also present during the surveys.

The project APE is generally undeveloped, with the exception of the offsite construction staging area. Approximately 75% of the APE contains dense vegetation consisting of dense brush and shrubs that obscured the ground visibility. Ground visibility was poor (0-25%) in the north and northwestern sections of the project APE that contained dense vegetation and ground visibility was good (50-75%) in the southern section of the project APE, which contained dirt trails and cleared areas for irrigation systems. Evidence of previous ground disturbance related to construction of 47th Street and Fairmount Avenue, and adjacent residential and commercial development was observed. The offsite temporary staging area is located on a vacant lot adjacent to a park, concrete drainage, and a roadway. Gravel has been placed throughout a majority of the staging area. Vegetation consisted of non-native grass, horsetweed, and non-native trees. A majority of the ground visibility was great (80-90%), especially in areas where the ground surface was not obscured by vegetation or gravel. Ground visibility was fair (25-50%) in areas where dense vegetation was present, which were located along the northern and eastern boundary of the staging area. Modern day debris was also scattered throughout the project APE.

No cultural, archaeological, or built environment resources were identified during the pedestrian surveys of the project APE.

Buried Site Sensitivity

According to the U.S. Department of Agriculture Natural Resources Conservation Services (USDA 2024), two soil types are mapped in the project APE: Huerhuero loam, 15 to 30 percent slopes, and made land. The Huerhuero loam soil series generally occur on marine terraces at elevations at approximately 1,100 feet and are comprised of calcareous alluvium derived from sedimentary rock. Reoccurring alluvial action and flooding serve to support the presence of subsurface cultural deposits in the area. Since there are alluvial soils present throughout the project APE, there is moderate potential for subsurface cultural resources.

5.12.2 REGULATORY FRAMEWORK

State

California Register of Historical Resources

Under the CEQA, the term “historical 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” (California Public Resources Code [PRC] 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 PRC 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 National Register of Historic Places (NRHP) criteria (California 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 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 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 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 (CAL-NAGPRA), 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. CAL-NAGPRA 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 and Public Resources Code Section 5097.98

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in California Health and Safety Code Section 7050.5 and PRC Section 5097.98.

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. 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 7050.5[b]). 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 7050.5[c]). In accordance with California PRC Section 5097.98(a), the NAHC will notify the Most Likely Descendant (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. Within 48 hours of being granted access to the site, the MLD may recommend means of treatment or disposition, with appropriate dignity, of the human remains and associated grave goods.

California Environmental Quality Act

As described further below, the following CEQA statutes and CEQA Guidelines are relevant to the analysis of historic, archaeological, and tribal cultural resources:

1. California PRC Section 21083.2(g): Defines “unique archaeological resource.”
2. California PRC 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 PRC Section 21074(a): Defines “tribal cultural resources” and Section 21074(b): Defines a “cultural landscape.”
4. California PRC 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 PRC 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 PRC 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 PRC Section 5024.1[g]). 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 PRC 21084.1; CEQA Guidelines section 15064.5(a)).

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 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 (California Public Resources Code Section 21083.2[a]; 14 CCR Section 15064.5[c][4]).

Pursuant to these sections, the 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 PRC Section 5097.98.

Assembly Bill 52

California Assembly Bill 52, which took effect July 1, 2015, establishes a consultation process between California Native American Tribes and lead agencies in order to address tribal concerns regarding project impacts and mitigation to “tribal cultural resources” (TCR). Public Resources Code Section 21074(a) defines TCRs and states that a project that has the potential to cause a substantial adverse change to a TCR is a project that may have an adverse effect on the environment. A TCR is defined as a site, feature, place, cultural landscape, sacred place, and object with cultural value to a California Native American tribe that is either:

1. listed or eligible for listing in the CRHR or a local register of historical resources, or
2. determined by a lead agency to be a TCR.

Local

The Programmatic Environmental Impact Report for the City General Plan states the following:

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

Historical Resources Guidelines, located in the Land Development Manual, provide property owners, the development community, consultants and the general public explicit guidance for the management of historical resources located within the City's jurisdiction. These guidelines are designed to implement the historical resources regulations and guide the development review process 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.

Any improvement, building, structure, sign, interior element and fixture, feature, site, place, district, area, or object may be designated a historical resource by the City's Historical Resources Board if it meets one or more of the following designation criteria:

- a. Exemplifies or reflects special elements of the City's, a community's, or a neighborhood's, historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping or architectural development;
- b. Is identified with persons or events significant in local, state or national history;
- c. Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
- d. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman;

- e. Is listed or has been determined eligible by the National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the State Historical Preservation Office for listing on the State Register of Historical Resources; or
- f. Is a finite group of resources related to one another in a clearly distinguishable way or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest or aesthetic value or which represent one or more architectural periods or styles in the history and development of the City.

According to the City's Significance Determination Thresholds (City of San Diego 2022), impacts to historical resources would be significant if the project would result in:

- An alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, object, or site.
- Any impact to existing religious or sacred uses within the potential impact area.
- The disturbance of any human remains, including those interred outside of formal cemeteries.

In general, the City's Historical Resource Guidelines build on federal and state cultural resources laws and guidelines in an attempt to streamline the process of considering impacts to cultural 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. Essentially, the City's historic resource guidelines localize cultural resources laws providing local perspective on significance criteria. In order to apply the criteria and determine the significance of potential project impacts to a cultural resource, the APE of the project 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 viewshed related to a historic building or structure.

City of San Diego Historic Guidelines

City of San Diego General Plan

The City's General Plan (Blueprint SD) was recently updated to address adopted plans and to create an equitable and sustainable framework for growth. The General Plan includes a Historic Preservation Element, that seeks "[t]o guide the preservation, protection, restoration, and rehabilitation of historical and cultural resources and maintain a sense of the City. The following policies from the Historic Preservation Element are applicable to the project:

- HP-A.3.** Foster government-to-government relationships with the Kumeyaay/ Diegueño tribes of San Diego.
- a. Regularly meet with local Tribal governments to discuss issues of mutual concern.
 - b. Formally consult with identified California Native American tribes prior to the adoption or amendment of the General Plan or specific plan or the designation of open space.

- c. Maintain confidentiality concerning locations of traditional cultural places that are identified through the consultation process and otherwise.
- d. Support Tribal governments holding conservation easements over land voluntarily set aside for the protection of cultural places.

HP-A.4. Actively pursue a program to identify, document and evaluate the historical and cultural resources in the City of San Diego.

- a. Develop context statements specific to areas being surveyed.
- b. Complete and regularly update a comprehensive citywide inventory of historical and cultural resources in conformance with state standards and procedures. Include community, neighborhood, cultural, and historic preservation groups, property owners, land developers, and the building industry in planning and implementing historic surveys.
- c. Require that archaeological investigations be guided by appropriate research designs and analytical approaches to allow recovery of important prehistoric and historic information.
- d. Require the permanent curation of archaeological artifact collections and associated research materials, including collections held by the City. Support the permanent archiving of primary historical records and documents now in public institutions.
- e. Include Native American monitors during all phases of the investigation of archaeological resources including survey, testing, evaluation, data recovery, and construction monitoring.
- f. Treat with respect and dignity any human remains discovered during implementation of public and private projects within the City and fully comply with the California Native American Graves Protection and Repatriation Act and other appropriate laws.

Mid-City Communities Plan

The M CCP, adopted November 1998 and most recently updated in 2015, provides the framework for development of the Mid-City community in conformance with the General Plan. The M CCP contains a Natural and Cultural Resources Element, which includes the following goal and recommendation to preserve, celebrate, and enhance prehistoric and historic resources (City of San Diego 2015).

Goal

Preserve areas of Mid-City possessing significant archaeological and palaeontologic interest.

Recommendation

- Identify and preserve significant prehistoric sites through zoning, development review or other regulatory means.

5.12.3 IMPACTS ANALYSIS

5.12.3.1 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 (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 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 an historical resource would be materially impaired."

Impact

The project APE consists of 1.88-acres which includes the disturbance area for the proposed fire station structure, parking lot, Zone 1 Defensible Space area, associated site infrastructure improvements, and offsite improvements, including an offsite temporary staging area. As previously described, the project APE is primarily characterized by undeveloped land, with dense vegetation and some disturbed areas associated with adjacent development and the offsite construction staging area. The offsite improvements consist of 0.8-acres which includes a new 22-foot-wide driveway apron, new 40-foot-wide driveway apron, and new crosswalk, concrete curb cut, and electrical power pole within the existing 47th Street right-of-way and a 0.52-acre temporary offsite construction staging area located south of Sunshine Beradini Park and north of Federal Boulevard.

As previously discussed, a records search and pedestrian surveys were conducted for the project APE. The entirety of the project APE has been surveyed by previous studies and resurveyed by Dudek in 2023 and 2024 with negative results. A search of records housed at the SCIC identified no previously recorded resources within the project APE. In addition, there are no existing buildings or structures located in the project APE. As such, no structures nor resources were determined to be eligible for NRHP, CRHR, or local register; therefore, no historical resources for the purposes of CEQA exist within the project APE.

While no cultural resources were identified within the project APE, based on the quantity of cultural resources identified within one-mile of the project APE, the APE's close proximity to Chollas Creek, which was prehistorically used by local Native Americans as a valuable source of resources and as a travel route, the presence of alluvial soils, the Cultural Resources Phase I Inventory Letter Report (Appendix I) prepared for the project indicates there is a low-to-moderate sensitivity for identifying intact subsurface archaeological deposits during project construction within areas that have not been previously disturbed. Construction activities have the potential to encounter and potentially damage or destroy unknown buried archaeological and Native American resources. As such, the impact is considered potentially significant, and an Archaeological and Native American monitoring program is recommended for the project's initial ground disturbing activities.

Significance of Impact

The Cultural Resources Inventory Letter Report prepared by Dudek (Appendix I) documents there are no known resources located within the project APE. However, due to the low-to-moderate sensitivity for identifying intact subsurface archaeological deposits within areas that have not been previously disturbed, ground disturbance associated with project construction has the potential to uncover previously unknown archaeological and Native American resources, resulting in a **potentially significant impact**.

Mitigation

MM-HIST-1 Archaeological Resources

I. Prior to Permit Issuance or Bid Opening/Bid Award

A. Entitlements Plan Check

1. Prior to permit issuance or Bid Opening/Bid Award, whichever is applicable, the City of San Diego Environmental Designee (ED) shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.

B. Letters of Qualification have been submitted to the City of San Diego ED

1. Prior to the Bid Award, the applicant shall submit a letter of verification to the City of San Diego ED identifying the project's Principal Investigator (PI) and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
2. City of San Diego ED will provide a letter to the applicant confirming the qualifications of the PI and that all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.
3. Prior to starting work, the applicant must obtain written approval from the City of San Diego ED for any personnel changes associated with the monitoring program.

II. Prior to the Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to the City of San Diego ED that a site-specific records search (quarter-mile radius) has been completed. Verification includes, but is not limited to, a copy of a confirmation letter from the South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
3. The PI may submit a detailed letter to the City of San Diego ED requesting a reduction to the quarter-mile radius.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE) and/or Building Investigator (BI) as appropriate, and the City of San Diego ED. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation-related Precon

Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.

- a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with City of San Diego ED, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Acknowledgement of Responsibility for Curation (CIP or Other Public Projects)

The applicant shall submit a letter to the City of San Diego ED acknowledging their responsibility for the cost of curation associated with all phases of the archaeological monitoring program.

3. Identify Areas to be Monitored

Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to the City of San Diego ED identifying the areas to be monitored including the delineation of grading/excavation limits.

The AME shall be based on the results of a site-specific records search as well as information regarding the age of existing pipelines, laterals, and associated appurtenances and/or any known soil conditions (native or formation).

The City of San Diego ED shall notify the PI that the Archaeological Monitoring Exhibit (AME) has been approved.

4. When Monitoring Will Occur

- a. Prior to starting any work, the PI shall also submit a construction schedule to the City of San Diego ED through the RE indicating when and where monitoring will occur.
- b. The PI may submit a detailed letter to the City of San Diego ED prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information, such as a review of final construction documents which indicate conditions such as the age of the existing pipe to be replaced, depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

5. Approval of Archaeological Monitoring Exhibit (AME) and Construction Schedule

After the City of San Diego ED approves the AME, the PI shall submit to the City of San Diego ED written authorization of the AME and Construction Schedule from the CM.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and the City of San Diego ED of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances, OSHA safety requirements may necessitate modification of the AME.
2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and the City of San Diego ED. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop, and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.
3. The PI may submit a detailed letter to the City of San Diego ED during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.
4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSV). The CM shall fax the CSVs to the RE on the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to the City of San Diego ED.

B. Discovery Notification Process

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil-disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources (i.e. within 100-feet of the find) and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless the Monitor is the PI) of the discovery.

3. The PI shall immediately notify the City of San Diego ED by phone of the discovery and, if possible, submit written documentation by fax or email within 24 hours, with photos of the resource in context.
4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance

1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow the protocol in Section IV below.
 - a. The PI shall immediately notify the City of San Diego ED by phone to discuss significance determination and shall also submit a letter to the City of San Diego ED indicating whether additional mitigation is required.
 - b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) and obtain written approval of the program from the City of San Diego ED, CM and RE. ADRP and any mitigation must be approved by the City of San Diego ED, RE and/or CM before ground-disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also a historical resource as defined in CEQA Section 15064.5, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.
 - (1). Note: For pipeline trenching and other linear projects in the public Right-of-Way, the PI shall implement the Discovery Process for Pipeline Trenching projects identified below under “D.”
 - c. If the resource is not significant, the PI shall submit a letter to the City of San Diego ED indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.
 - (1). Note: For Pipeline Trenching and other linear projects in the public Right-of-Way, if the deposit is limited in size, both in length and depth; the information value is limited and is not associated with any other resources; and there are no unique features/artifacts associated with the deposit, the discovery should be considered not significant.
 - (2). Note, for Pipeline Trenching and other linear projects in the public Right-of-Way, if significance cannot be determined, the Final Monitoring

Report and Site Record (DPR Form 523A/B) shall identify the discovery as Potentially Significant.

IV. *Discovery of Human Remains*

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification

1. Archaeological Monitor shall notify the RE, City of San Diego ED, and the PI, if the Monitor is not qualified as a PI. The City of San Diego ED will notify the appropriate ED to assist with the discovery notification process.
2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains.
2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenience.
3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.

C. If Human Remains ARE determined to be Native American

1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call.
2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.

4. The MLD will have 48 hours to make recommendations to the property owner or representative for the treatment or disposition with proper dignity of the human remains and associated grave goods.
 5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site; OR
 - b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance; THEN
 - c. To protect these sites, the landowner shall do one or more of the following:
 - (1) Record the site with the NAHC;
 - (2) Record an open space or conservation easement; or
 - (3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.
 - d. Upon the discovery of multiple Native American human remains during a ground-disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from a review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and items associated and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.
- B. If Human Remains are NOT Native American
1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.

2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).
3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for the internment of the human remains shall be made in consultation with the City of San Diego ED, , the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

- A. If night and/or weekend work is included in the contract
 1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
 2. The following procedures shall be followed.
 - a. No Discoveries

In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSV and submit to the City of San Diego ED via fax by 8 a.m. of the next business day.
 - b. Discoveries

All discoveries shall be processed and documented using the existing procedures detailed in Sections III – During Construction, and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.
 - c. Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III – During Construction and IV – Discovery of Human Remains shall be followed.
 - d. The PI shall immediately contact the RE and City of San Diego ED, or by 8 a.m. of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If night and/or weekend work becomes necessary during the course of construction
 1. The Construction Manager shall notify the RE at least 24 hours before the work is to begin.
 2. The RE shall notify the City of San Diego ED immediately.

- C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to the City of San Diego ED via the RE for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe as a result of delays with analysis, special study results or other complex issues, a schedule shall be submitted to the City of San Diego ED establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.
 - a. For significant archaeological resources encountered during monitoring, the Draft Monitoring Report shall include the Archaeological Data Recovery Program or Pipeline Trenching Discovery Process.
 - b. Recording Sites with State of California Department of Parks and Recreation

The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.
2. The City of San Diego ED shall return the Draft Monitoring Report to the PI via the RE for revision or, for preparation of the Final Report.
3. The PI shall submit a revised Draft Monitoring Report to the City of San Diego ED via the RE for approval.
4. The City of San Diego ED shall provide written verification to the PI of the approved report.
5. The City of San Diego ED shall notify the RE of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and cataloged.

2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area, that faunal material is identified as to species, and that specialty studies are completed, as appropriate.

C. Curation of artifacts: Accession Agreement and Acceptance Verification

1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with the City of San Diego ED and the Native American representative, as applicable.
2. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection C.
3. The PI shall submit the Accession Agreement and catalog record(s) to the RE or BI, as appropriate for donor signature, with a copy submitted to the City of San Diego ED.
4. The RE or BI, as appropriate, shall obtain a signature on the Accession Agreement and shall return it to PI with a copy submitted to the City of San Diego ED.
5. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE and City of San Diego ED.

D. Final Monitoring Report(s)

1. After notification from the City of San Diego ED of the approved report, the PI shall submit one copy of the approved Final Monitoring Report to the RE and one copy to the City of San Diego ED (even if negative) within 90 days.
2. The RE shall not issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from the City of San Diego ED, which includes the Acceptance Verification from the curation institution.

Significance of Impact After Mitigation

Archaeological and Native American monitoring program in accordance with General Plan policy HP-A.4 (e) which requires Native American monitors for construction monitoring in addition to City Guidelines required for the project's initial ground disturbing activities, as well as compliance with mitigation measure

MM-HIST-1 would reduce the project's impacts to unknown archaeological resources to a **less-than-significant** level.

5.12.3.2 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?*

Threshold

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

Based on the negative NAHC SLF results, SCIC records search results and survey, no religious or sacred uses are known to exist within the project APE, nor were identified as part of the site-specific evaluation conducted as part of the Cultural Resources Phase I Inventory Letter Report (Appendix I). The SCIC records search did not identify any existing religious or sacred uses within the project APE. Additionally, the NAHC Sacred Lands File search did not identify sacred lands within project APE.

Because of the lack of existing religious or sacred uses, the project would not result in an impact under this category to existing religious or sacred uses (please see also Section 5.15, Tribal Cultural Resources for an evaluation of tribal cultural resources).

Significance of Impact

No existing religious or sacred uses are located on the project site. Therefore, **no impact** would occur.

Mitigation

No mitigation would be required.

5.12.3.3 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?*

Threshold

In accordance with the City's Significance Determination Thresholds (2022), prehistoric and historic resource impacts may be significant if the project would result in impacts to:

- Discovery of human remains shall always be treated as a significant discovery.

Impact

There are no formal cemeteries or known burials in the immediate vicinity of the project APE. In the unlikely event of a discovery of human remains, the project would be handled in accordance with procedures of the California PRC (Section 5097.98), California Health and Safety Code (Section 7050.5), California Government Code Section 27491, and General Plan policy HP-A.4 (f) that requires human remains if unearthed during construction be treated with respect and dignity and fully comply with the California Native American Graves Protection and Repatriation Act and other appropriate laws. 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 APE. However, in the event of an unanticipated discovery of human remains during construction, the project could result in **potentially significant** impacts.

Mitigation

Mitigation Measure **MM-HIST-1** described within Section 5.12.3.1 Issue 1 ensures compliance with the law and the procedures in the event of an unanticipated discovery of human remains.

Significance of Impact After Mitigation

The discovery of human remains would require handling in accordance with CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5), which states that in the event that human remains are discovered during construction, construction activity shall be halted, and the area shall be protected until consultation and treatment can occur as prescribed by law. Adherence to state law and implementation of mitigation measure **MM-HIST-1** would reduce impacts to human remains to a **less-than-significant** level.

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5.13 PUBLIC SERVICES AND FACILITIES

This section describes the existing public services and facilities conditions of the proposed Fairmount Avenue Fire Station Project (project), identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to the implementation of the project.

Analysis of this section is informed, in part, by information from the City of San Diego General Plan (Blueprint San Diego) (2024) and the City of San Diego Fire-Rescue Department (SDFD). Comments received in response to the Notice of Preparation are available in Appendix A to this EIR.

5.13.1 EXISTING CONDITIONS

Fire Rescue Services

The SDFD provides fire protection services throughout the City of San Diego (City), including the project site. The SDFD's service area spans 343 square miles and serves a population of 1,419,845 (City of San Diego 2024a). The SDFD has 52 fire stations total and employs 949 uniformed fire personnel, 98 permanent uniformed lifeguard personnel, and 246 civilian personnel (City of San Diego 2024a).

Based on the SDFD's standards, a 3-mile distance between fire stations would be sufficient to achieve response time objectives. Additionally, fire response should arrive within 7.5 minutes of a dispatch call center receipt to treat medical patients and control small fires, and within 10.5 minutes for serious emergencies (City of San Diego 2024b). The project site is located within Station 12's service area, which encompasses 7.04 square miles. Station 12 is located at 4964 Imperial Avenue, approximately two miles in driving distance south of the project site. Engine 12, Truck 12, Medic 12, and Battalion Truck 6 operate out of Station 12 (City of San Diego 2024c; 2024d). Station 26, situated at 2850 54th Street, is also located approximately two miles in driving distance northeast of the project site. Station 26 houses Engine 26 and Medic 26 (City of San Diego 2024e).

According to the Public Facilities, Services and Safety Element of the City of San Diego General Plan, the Fire-Rescue Department has Automatic Aid agreements with jurisdictions adjoining the city (City of San Diego 2024b). These agreements assure that the closest engine company responds to a given incident regardless of which jurisdiction it represents. Mutual Aid agreements with county, state, and federal agencies further allow the City and any other participating agency to request additional resources depending on the complexity and needs of a given incident, such as wildfires.

Police Services

The San Diego Police Department (SDPD) provides police services to the city, including patrol, traffic, investigative, records, laboratory, and support services. The SDPD serves a population of approximately 1.41 million people within 372.4 square mile service area (City of San Diego 2024a). The project site is located within the SDPD Southeastern Division, which serves the neighborhoods of Emerald Hills, Valencia Park, Encanto, Jamacha, Lomita, Broadway Heights, Skyline, Bay Terraces, Paradise Hills, Alta Vista, Mountain View, Southcrest, Shelltown, Mount Hope, Chollas View, Lincoln Park, Ridgeview, Webster and Oak Park (City of San Diego 2024f). The Southeastern Division Substation is located approximately 3.3 miles southeast of the project site, at 7222 Skyline Drive.

The SDPD currently uses a five-level priority call dispatch system, which includes priorities E (imminent threat to life), 1, 2, 3, and 4 (City of San Diego 2024b). 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 1 calls involve serious crimes in progress or a potential for injury. Priority 2 calls include vandalism, disturbances, and property crimes. Priority 3 calls include calls after a crime has been committed such as cold burglaries and loud music. Priority 4 calls include parking complaints or lost and found reports. Table 5.13-1 lists the department's response time guidelines and the actual average response times.

Table 5.13-1
San Diego Police Department Call Priority Response Times

Call Priority	General Plan Response Time Goals	Police Department Response Time Goals (2020)	Actual Average Response Times (2020)
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
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

Source: City of San Diego 2021; 2024b.

As indicated in Table 5.13-1, the response times for each priority call category did not meet SDPD response time goals or the General Plan response time goals.

Public Parks and Recreation Facilities

The City's General Plan and the Parks Master Plan guide the development of park and recreation facilities in 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 2024b).

The project site is in close proximity to several parks including Gompers Park, approximately 0.65 miles southeast at 4926 Hilltop Drive; Oak Park approximately 0.8 miles northeast at 5235 Maple Street; Azalea Park approximately 1 mile northwest; and Emerald Hills Park approximately 1.2 miles southeast. Given the type of project it would not generate new residents requiring parks and other recreational amenities. The project also includes a fitness center for employees and firefighters to use while at the station.

Schools

The project site is located within the San Diego Unified School District (SDUSD) boundary (City of San Diego 2024b). Thus, the project would be served by SDUSD for the provision of school services. SDUSD serves more than 121,000 students in preschool through grade 12 and is the second-largest district in California. The schools closest to the project site include Webster Elementary School, Holly Drive Leadership Academy, Millennial Tech Middle School, and Lincoln High School (SDUSD 2024).

Given the type of project it would not generate new residents to the area. Consequently, there would be no impact on the current school capacity and enrollment. This ensures that the educational infrastructure in place can continue to serve the community effectively, without necessitating adjustments to accommodate additional student populations.

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 the quality of life through technologically improved services and welcoming environments. General Plan policy indicates that branch libraries should be 25,000 square feet or larger and include features and services that address community-specific needs (City of San Diego 2024b). The nearest municipal library to the project is the Oak Park Branch Library, located 1.12 miles northeast at 2802 54th Street.

5.13.2 REGULATORY FRAMEWORK

Federal

There are no federal regulations related to public services and facilities relevant to the project.

State

Senate Bill 50

Senate Bill (SB) 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. Because public projects like fire stations are not typically included in the scope of ‘real property development’ for purposes of increasing school enrollment and because the project would not generate enrollment impacts, which are the main target of SB 50 and related laws this project would most likely be exempt from paying fees.

California Mutual Aid

The purpose of Emergency Management Mutual Aid (EMMA) 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 EMMA 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, EMMA 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 (City of San Diego 2024b). Furthermore, this element provides policies for financing, prioritization, developer, and City funding responsibilities for public facilities. Policy PF-B.4. requires development proposals to fully address impacts to public facilities and

services. 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 5.13-1 for police services. The Public Facilities, Services, and Safety Element also establishes guidelines and policies for branch libraries. 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 establishes goals for the City to provide a multilevel public and private school system that provides opportunities for students to attend schools within their residential neighborhoods as well as choices in educational settings outside their neighborhoods.

Relevant goals and policies contained in the Public Facilities, Services, and Safety Element are identified below.

Public Facilities, and Safety Element

- PF-D.1.** Locate, staff, and equip fire stations to meet established response times as follows.
- a. To treat medical patients and control small fires, the first-due unit should arrive within 7.5 minutes, 90 percent of the time from the receipt of the 911 call in fire dispatch. This equates to 1-minute dispatch time, 1.5 minutes company turnout time and 5 minute drive time in the most populated areas.
 - b. To provide an effective response force for serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911-call receipt in fire dispatch, 90 percent of the time.
 - This response is designed to confine fires near the room of origin, to stop wildland fires to under 3 acres when noticed promptly, and to treat up to 5 medical patients at once.
 - This equates to 1-minute dispatch time, 1.5 minutes company turnout time and 8 minute drive time spacing for multiple units in the most populated areas.

Table PF-D.1
Deployment Measures to Address Future Growth by Population Density per Square Mile

	>1,000- people/sq. mi.	1,000 to 500 people/sq. mi.	500 to 50 people/sq. mi.*	Permanent open space areas
1st Due Travel Time	5 minutes	12 minutes	20 minutes	10 minutes

Table PF-D.1
Deployment Measures to Address Future Growth by Population Density per Square Mile

	>1,000- people/sq. mi.	1,000 to 500 people/sq. mi.	500 to 50 people/sq. mi*	Permanent open space areas
Total Reflex* Time	7.5 minutes	14.5 minutes	22.5 minutes	12.5 minutes
1st Alarm Travel Time	8 minutes	16 minutes	24 minutes	15 minutes
1st Alarm Total Reflex*	10.5 minutes	18.5 minutes	26.5 minutes	17.5 minutes

Note: *Reflex time is the total time from receipt of a 9-1-1 call to arrival of the required number of emergency units.

- PF-D.2.** Determine fire station needs, location, crew size and timing of implementation as the community grows.
- Use the fire unit development performance measures (based on population density per square mile) shown in Table PF-D.1 to plan for needed facilities. Where more than one square mile is not populated at similar densities, and/or a contiguous area with different density types aggregates into a population cluster area, use the measures provided in Table PF-D.2.
 - Reflect needed fire-rescue facilities in community plans and associated facilities financing plans as a part of community plan updates and amendments.

Table PF-D.2
Deployment Measures to Address Future Growth by Population Clusters

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

- PF-D.3.** Monitor, and maintain adopted service delivery objectives based on time standards for all fire, rescue, emergency response, and lifeguard services.
- PF-D.4.** Provide adequate fire station site area (typical site is approximately 0.75 acre) and allow room for station expansion with additional considerations:

- Consider the inclusion of fire station facilities in villages or development projects as an alternative method to the acreage guideline;
- Where density and development constrain site size consider a multistory station;
- Acquire adjacent sites that would allow for station expansion as opportunities allow; and
- Gain greater utility of fire facilities by pursuing joint use opportunities such as community meeting rooms or collocating with police, libraries, or parks where appropriate.

PF-D.5. Maintain service levels to meet the demands of continued growth and development, tourism, and other events requiring fire-rescue services.

- a. Provide additional response units, and related capital improvements as necessary, whenever the yearly emergency incident volume of a single unit providing coverage for an area increases to the extent that availability of that unit for additional emergency responses and/or non-emergency training and maintenance activities is compromised. An excess of 2,500 responses annually requires analysis to determine the need for additional services or facilities.

PF-D.6. Provide public safety related facilities and services to assure that adequate levels of service are provided to existing and future development.

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 seven minutes.
- Priority 1 Calls (serious crimes in progress) within 12 minutes.
- 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.

Recreation Element

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. The Recreation Element guidelines for resource-based parks are as follows:

- Resource-based parks are located at, or centered on, notable natural or man-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.

Relevant policies from the Recreation Element of the City's General Plan (City of San Diego 2024b) are listed below.

- RE-C.1.** Protect existing parklands and open space from unauthorized encroachment by adjacent development through appropriate enforcement measures.
- RE-C.11.** Promote development patterns that are consistent with MSCP, VPHCP, and other applicable regulations and that contribute to clean air and clean water and help the city meet its climate action and resilience goals.

City of San Diego Parks Master Plan

The City's Parks Master Plan was adopted August 2021 and is designed to work in concert with other Citywide plans, including the City's General Plan (City of San Diego 2021). The Parks Master Plan includes guiding principles, goals and policies to expand and upgrade parks in the city to create an interconnected Citywide parks system that provides opportunities for everyone to access and use the various parks and open space amenities.

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 (CAL FIRE) 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. CAL FIRE recommendations are not the same as actual zones, which do not go into effect unless adopted by local agencies (CAL FIRE 2019). In San Diego County, CAL FIRE made recommendations for 13 cities, including the City. The project site is located within a Local Responsibility Area and is classified as non-Very High Fire Hazard Severity Zone (CAL FIRE 2025). 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). Speed calls for first-due, all risk intervention units (engines, trucks, and/or rescue ambulances) are strategically located across a community responding 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 refers to the number of units needed to respond to serious emergencies such as a room and contents structure fire, a multiple patient incident, 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).

The study concluded that additional fire-rescue resources were needed. 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

In order to confine fires near the room of origin, keep wildland fires under 3 acres when noticed promptly, and 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. 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).

San Diego Municipal Code Section 142.0412

Section 142.0412 of the 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. Section 142.0412 identifies two brush management zones: 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. The project site is located adjacent to undeveloped land that contains native and naturalized vegetation so would be required to provide brush management (City of San Diego 2024g).

San Diego Municipal Code Section 142.0640

The City requires payment of Development Impact Fees (DIFs), pursuant to the Mitigation Fee Act (California Government Code §66000 et seq.) to collect a proportional fair share cost of capital improvements needed to offset the impact of the development. Development Impact Fees are based on community-specific financing plans completed when Community Plans are updated. Financing plans were formerly known as Public Facilities Financing Plans and are now referred to as Impact Fee Studies.

The City's General Plan Public Facilities, Services, and Safety Element includes a number of policies that address financing of public services and facilities and specifies that Impact Fee Studies should be completed concurrent with preparation of Community Plan updates, should set community-level priorities for facility financing, and ensure that new development pays its proportional fair share of public facilities costs through payment of Development Impact Fees. Facility types that are eligible for Development Impact Fee funding include transportation, storm drains, parks and recreation, fire rescue, police, and libraries.

5.13.3 IMPACTS ANALYSIS

5.13.3.1 Need for New or Altered Governmental Services

Issue 1: Would the proposal 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?

Threshold

Per the City's Significance Determination Thresholds (City of San Diego 2022), impacts to public services and facilities would be significant if a project would result in the need for new or expanded public service facilities, the construction of which would cause direct, adverse physical environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts would also be significant if a project would conflict with the community plan in terms of the number, size, and location of public service facilities.

Impact

Fire-Rescue Services

The project, which includes the construction of a fire station, would not exceed the City's threshold of 75 dwelling units or 100,000 SF of non-residential construction. The project would not generate additional demand for fire protection and emergency services within the specified service area beyond what is currently anticipated. Development of a new fire station in this area of the city was determined necessary to address the existing gap in service coverage, as current facilities are not adequately equipped to serve the expanding needs of this area of the city.

Station 12 and 26, located approximately two miles south and northeast of the project site, respectively, currently serve the area with Engine 12, Truck 12, Medic 12, Battalion Truck 6, Engine 26, and Medic 26. As described in the MCCP, despite the two stations' proximity, the area remains underserved, and response times are not being met, highlighting the necessity for additional infrastructure to meet the City's emergency response objectives. This approach aligns with the City's broader strategy to maintain a 3-mile distance between fire stations, optimizing response times across different emergency scenarios further solidifying the City's commitment to achieving its response time objectives and enhancing the overall safety and well-being of its residents. As such, the project would be consistent with the MCCP in terms of number, size, and location of public service facilities.

The project would meet SDFD site design and construction design standards with respect to assuring adequate safety from fire hazards. The proposed fire station and infrastructure would be constructed per applicable state and City fire codes and comply with all applicable City regulations. The project would also be required to conform to the City's brush management regulations in accordance with Section 142.0412 of the City's Municipal Code due to adjacent undeveloped lands.

Correspondence with SDFD confirms that the project, by addressing a critical service gap, does not necessitate further expansions or improvements beyond its scope. The project is designed to serve future development in this area of the city and as noted above, would not introduce a new population requiring fire protection services. The project would not result in the need for new or expanded fire station facilities in order to maintain acceptable service ratios, response times, or other performance objectives.

Police Services

The project includes development of a new fire station which would not exceed the City's threshold of 75 dwelling units or 100,000 SF of non-residential construction. The closest police station that would serve the site is the Southeastern Division Substation located approximately 3.3-miles southeast of the project site, at 7222 Skyline Drive. As indicated in Table 5.13-1, the response times for each priority call category did not meet SDPD response time goals or the General Plan response time goals.

The project would not result in additional residents and new housing that would require police services. Fire stations typically do not generate a need for police response. Given fire station would be occupied 24 hours, break-ins and other types of theft or property damage is low. For security purposes, employee parking would be protected by a security gate.

The project would not require new police facilities or improvements to existing police facilities. The existing police facilities would continue to serve the project site and the project would not result in the need for new or expanded police station facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Because the project would not require new police facilities or improvements to existing police facilities, the project would not conflict with the MCCP in terms of the number, size, and location of police service facilities.

Public Parks and Recreational Facilities

The project includes the development of a new fire station which would not introduce a new population base that would require parks and other recreation facilities. The fire station includes a fitness center for employees and fire fighters. When on-duty, fire fighters are required to not leave the premises so there would be no demand for parks or other public recreation facilities during working hours. A fire station does not contribute to the City's recreational value points; therefore, the project would not be subject to the Citywide Parks Development Impact Fee. The project would not result in the need for new or expanded parks or recreation facilities in order to maintain acceptable service ratios, response times, or other performance objectives. As such, the project would not conflict with the MCCP in terms of the number, size, and location of parks and recreational facilities.

Schools

Potential impacts to schools serving the project site would be related to the number of students generated by the project. As discussed above, a fire station would not introduce a new population that would contribute to an increase in the student population. Consequently, the project would not affect student generation rates, nor necessitate the construction of new educational facilities or the expansion of existing ones within the SDUSD. As such, the project would not conflict with the MCCP in terms of the number, size, and location of school facilities. Furthermore, the project is not required to pay school impact fees because it is a public project.

Libraries

The nearest municipal library to the project is the Oak Park Branch Library, located 1.12 miles northeast to the project site at 2802 54th Street. As discussed above, a fire station would not introduce a new population that would contribute to an increase in demand for library services. As a result, the project would not result in the need for new or expanded libraries in order to maintain acceptable performance objectives, nor would it conflict with the MCCP in terms of the number, size, and location of library facilities.

Significance of Impact

Fire-Rescue Services

The project would not introduce a new population that would increase fire-rescue service calls; therefore, no new facilities or improvements to existing facilities would be required as a result of the project and there would be **no impact**.

Police Protection

The project would not introduce a new population that would increase demand for police services; therefore, no new facilities or improvements to existing facilities would be required as a result of the project and the impact would be **less than significant**.

Public Parks and Recreation Facilities

The project would not introduce a new population that would result in the need for park and recreational facilities, nor would the project impede access to any existing parks or recreational facilities. Therefore, no park and recreation facility expansion beyond what is already planned in the community would be required and there would be **no impact**.

Schools

The project would not generate students; therefore, the existing schools have sufficient capacity serve students and there would be **no impact**.

Libraries

The project would not introduce a new population that would result in the need for new library facilities or improvements to existing facilities. Thus, there would be **no impact** to library facilities.

Mitigation

No mitigation measures would be required.

5.14 PUBLIC UTILITIES

This section describes the existing utilities conditions of the proposed Fairmount Avenue Fire Station Project (project) site, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if applicable, related to implementation of the project.

The following discussion is based on the following technical reports prepared for the project: Sewer and Water Study by RRM Design Group (Appendix J.1) and the Water Budget Landscape Worksheets as required by the City's Land Development Code Landscape Standards (Appendix J.2).

5.14.1 EXISTING CONDITIONS

Water

Local Water Source and Supply

Water service to the project site is provided by the City of San Diego Public Utilities Department (PUD). PUD serves nearly 1.4 million people populating over 404 square miles, with average deliveries of 155 million gallons per day (mgd). PUD maintains a complex water system that includes nine surface reservoirs, three drinking water treatment plants, 29 treated water storage facilities, 131 hydraulic pressure zones, 300+ pressure reducing stations, 29 reservoirs/storage tanks, 49 pump stations, and approximately 3,300 miles of water transmission and distribution pipelines (City of San Diego 2021b; 2022).

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.

Recycled Water

PUD has developed a separate recycled water system to offset the demand for potable water. The goal is to reduce the City's dependence on imported water and increase reliability by providing non-potable water supplies. The City's recycled water system extends approximately 99 miles (City of San Diego 2021a). There are no recycled water lines within or around the project site. The majority of these lines are located approximately 10 miles north of the project site, though there are a few lines in the southern service area near the border.

Additionally, potable reuse through the Pure Water Program, approved by City Council in 2014, is currently under development. Pure Water is a 20-year (2015–2035) multi-phased water and wastewater initiative that is expected to create 83 mgd of locally controlled water upon full

implementation in 2035. Pure Water will divert treated water from the Point Loma Wastewater Treatment Plant (PLWWTP) ocean outfall and recycle this valuable and limited resource that is currently discharged to the ocean. Pure Water will use advanced water treatment processes to turn recycled water into water of equal or greater quality than the imported sources. Pure Water Phase 1 is expected to be online by March 2025. Production is expected to be a staged ramp-up flow with 30 mgd produced by the end of 2025. This will allow the City to provide a reliable drinking water supply that is locally controlled and drought proof and reduce the amount of water it purchases from other water providers (City of San Diego 2021b).

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 of water per day 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 [CRA]) and the Sacramento and San Joaquin Rivers (via the State Water Project [SWP]). Together, these two sources provide approximately 50% of Southern California's water; the remainder comes from various local sources. The CRA 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 SWP is the California Aqueduct, which extends approximately 444 miles south from the Sacramento-San Joaquin Delta to Lake Perris in Riverside County. 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, which includes the project site (SDCWA 2021). The SDCWA operates and maintains a regional water delivery system capable of delivering more than 900 mgd of water. This system consists of two 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 SWP through a massive 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 (SANDAG) is responsible for providing and updating land use planning and demographic forecasts for the region, including the City. MWD and SDCWA update their water demand and supply estimates based on the most recent demographic forecasts approximately every five years to coincide with preparation of their respective Urban Water Management Plans (UWMPs) (SDCWA 2021).

SDCWA's 2021 UWMP includes a summary of the total projected water supplies and demands over the next 20 years in five-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 (maf) of supplies due to dry conditions and increased reductions in deliveries from the SWP (no Sacramento–San Joaquin River 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 the 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 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 PUD, aims to reduce water use in the city by offering various rebate programs, landscaping classes, education, and free water conservation surveys for property owners and tenants (City of San Diego 2021b). 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.

Water Infrastructure

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, 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. PUD also maintains several emergency connections to and from neighboring water agencies, including Santa Fe Irrigation District, City of Poway, Olivenhain

Municipal Water District Cal-American Water Company, Sweetwater Authority, and Otay Water District.

Potable Water Service

The following information is based on the Sewer and Water Study prepared by RRM Design Group (Appendix J.1) regarding existing water infrastructure near the project site.

The project site is located within the City's water and sewer service boundary and within the Alvarado service area. An existing 8-inch water main is located within 47th Street, approximately 0.80 miles north of the project site. Per the City's PUD, the existing pressure is 104 pounds per second (psi) (Appendix J.1). Domestic water service would be provided with a water service and meter and a reduced pressure backflow device and lateral. Fire service would be provided with water service, a reduced pressure backflow device, and lateral.

Wastewater Infrastructure

Wastewater collection and treatment services are provided by PUD. The City's wastewater system consists of two components:

- The Metropolitan Sewerage Sub-System treats the wastewater from the City and 15 other cities and districts within a 450-square-mile area. An average of 160 mgd of wastewater is treated. Planned improvements are proposed to 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 PLWWTP, the North City Water Reclamation Plant, the South Bay Water Reclamation Plant, and the Metro Biosolids Center. The PLWWTP, which would serve the project, has a total treatment capacity of 240 mgd and an average flow rate of 144 mgd, resulting in the available treatment capacity of 96 mgd (City of San Diego 2014).

Wastewater Service Infrastructure

The following information is based on the Sewer and Water Study prepared by RRM Design Group (Appendix J.1) regarding the proposed wastewater infrastructure on the project site.

Wastewater collection and the City's sewage system are maintained and operated by the City's Public Utilities Department to ensure sufficient capacity is available for dry weather conditions and storm or wet weather peak-flow events.

The project site is located within the City's water and sewer service boundary. The City of San Diego Trunk Sewer system collects wastewater flows from the area surrounding the project site. The Trunk Sewer has a large diameter (approximately 30-inch diameter) that connects to other subsequent downstream sewers. An existing sanitary sewer line and sewer manhole are located within 47th Street. The project would connect to the existing sewer infrastructure via two new sewer lines, a new lateral and a clarifier for the fire station, and a separate sewer line for the trash enclosure drain. The new sewer lines are proposed to be located under the parking lot and the southern portion of the fire station building. These lines would then connect to the existing sewer line at the location of the manhole, northeast of the proposed fire station.

Solid Waste Management

Solid waste management in the project area is provided by the City's Environmental Services Department (ESD) and private collectors.

The closest landfill to the project is Miramar Landfill, which is owned/operated by ESD and located approximately 8.8 miles from the project site. 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 2025 (City of San Diego 2024a).

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 10 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 2024a). Otay Landfill is located approximately 9.7 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 2024b).

Electricity and Natural Gas

The project area is served by SDG&E. SDG&E 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 2024). Existing overhead electrical lines are located along 47th Street adjacent to the project site.

5.14.2 REGULATORY FRAMEWORK

The following summarizes those regulations applicable to the project.

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.

State

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.

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 an Urban Water Management Plan (UWMP) and update it every five 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.

An 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.

The City updated its UWMP in 2020 and published it in June 2021. The SDCWA's most recent UWMP was published in May 2021. The Metropolitan Water District of Southern California published its most recent urban water management plan in June 2021.

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 five 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 Code) 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. The CALGreen Code 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. The project would be constructed in compliance with CALGreen.

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.

California Porter–Cologne Water Quality Control Act

The Porter–Cologne Water Quality Control Act (Porter–Cologne Act) is the principal state law enacted to establish requirements for adequate planning, implementation, management, and enforcement of water quality controls. The Porter–Cologne 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 (RWQCBs), and established the SWRCB. For the San Diego Hydrologic Region, water quality is regulated by the San Diego RWQCB, Region 9 of the SWRCB. Each RWQCB 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 five 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 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 consist of five or more units. The City has complied with AB 1826 by adopting a Recycling Ordinance, which was recently updated in 2022. The ordinance can be found in chapter 6, article 6, division 7 of the SDMC (City of San Diego 2007).

California Solid Waste Reuse and Recycling Access Act of 1991 – Assembly Bill 1327

AB 1327, which was established in 1991, required 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. The City's recycling ordinance (SDMC Chapter 6, Article 6, Division 7) also addresses provision of adequate areas for collection.

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. The City was at a waste diversion rate of 71% as of 2022 (City of San Diego 2023).

Solid Waste Diversion – Assembly Bill 341

Effective July 1, 2012, AB 341 requires that commercial enterprises that generate four CY or more of solid waste weekly participate in recycling programs. 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. As mentioned above, the City was at a waste diversion rate of 71% as of 2022 (City of San Diego 2023).

Local

City of San Diego General Plan

The City's Public Facilities, Services, and Safety Element of the General Plan addresses facilities and services that are publicly managed and have a direct influence on the location of land uses (City of San Diego 2024b). These include Fire-Rescue, Police, Wastewater, Storm Water, Water Infrastructure, Waste Management, Libraries, Schools, Information Infrastructure, Disaster Preparedness, and Seismic Safety. The following policies are applicable to the project.

Wastewater

- 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).

Stormwater Infrastructure

- 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 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.

Waste Management

- 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. Strive for recycling of 100% of inert C&D materials and a minimum of 50% by weight of all other material.

Utility

- 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.

City of San Diego Zero Waste Plan

The City's Zero Waste Plan, a component of the City's Climate Action Plan (CAP), was approved and adopted by the City Council on July 13, 2015. The CAP was updated in August 2022 and includes Strategy 4: Circular Economy and Clean Communities Measure 4.4, which calls for the City to update

the zero waste plan. In the updated CAP the City established waste diversion targets of 82% in 2030 and 90% in 2035.

The 2015 Zero Waste Plan identified that San Diego increased its diversion rate from approximately 40% in 1995 to approximately 67% in 2013 and that adoption and implementation of the City Recycling Ordinance (SDMC Chapter 6, Article 6, Division 7) and Construction and Demolition (C&D) Debris Deposit Ordinance (SDMC Chapter 6, Article 6, Division 6) and “a variety of other waste diversion programs have been crucial in positioning the City on the road to Zero Waste” (City of San Diego 2015).

City of San Diego Municipal Code

The project is construction and operation of a City-owned fire station which is not subject to compliance with the SDMC. However, the project is required to comply with applicable state requirements and the City’s building codes; General Plan and Communities Plan; and other adopted state and City plans.

Chapter 14, Article 10, Division 1 (Green Building Regulations)

This section is intended to encourage sustainable construction practices and to reduce negative environmental impacts by adopting green building concepts and regulating the construction of new buildings.

City of San Diego Water System Design Criteria

The City of San Diego Water Facility Guidelines and Standards (City of San Diego 2021) was used to analyze the project’s proposed water system. A summary of the design criteria is presented in Table 5.14-1.

**Table 5.14-1.
City of San Diego Water System Design Criteria**

Criteria	Design Requirement
Minimum Static Pressure	65 psi ¹
Maximum Static Pressure	120 psi
Maximum Pressure Drop – One Supply Source Out of Service	40 psi
Maximum Pressure Drop – Peak Hour and Max Day Plus Fire	25 psi
Minimum Pressure – Peak Hour	40 psi
Minimum Pressure – Max Day plus Fire	20 psi
Maximum Pipeline Velocity (Fire Flow)	15 fps ²
Maximum Pipeline Velocity (Normal Operating Conditions)	5 fps

Source: City of San Diego 2021.

Notes:

¹ pounds per square inch = psi

² feet per second = fps

City of San Diego Land Development Code – Landscape Standards

The Landscape Standards establish requirements for plant materials, irrigation and water conservation, landscaping in parking lots and other vehicular use areas, brush management, revegetation and erosion control, and soil management. 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.

5.14.3 IMPACTS ANALYSIS

5.14.3.1 Issue 1: Need for New or Altered Utilities Systems

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 2022), 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 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?
- Affect biological resources including habitat?
- Have a negative aesthetic affect?
- Increase noise levels to existing receptors?

Impact

This impact analysis is based on the anticipated operation of the fire station, as described in Chapter 3, Project Description. The project proposes the construction of a 22,443 square-foot four story fire station on a 1.28-acre site. The fire station would support a total of 12 firefighters and rescue staff, with the firefighters working 24-hour shifts, and the ambulance crew working either 12 or 24-hour shifts per day.

Water

The water demands for the project were developed in accordance with the City of San Diego Design Guidelines and Standards. In accordance with the City's Guidelines, the Sewer and Water study prepared by RRM Design Group (Appendix J.1) estimated demand based on the site's R-1-7 zoning designation, per the City's guidelines. As such, the study assumed a greater number of employees (32.1 employees) compared to the actual estimated number (12 employees), which has resulted in a conservative estimate of anticipated water demand. Based on the City's water demand equations, the project would result in a peak domestic water demand of 77.6 AFY (Appendix J.1). The estimated irrigation water demand 121 AFY (Appendix J.2). Combined, the project would result in a peak water demand of 198.6 AFY.

There is an existing 8-inch water main located in 47th Street, adjacent to the project site. Access to domestic water and water for irrigation would be provided by a 2-inch water service line and meter, along with a 2.5-inch reduced pressure backflow device and lateral. Fire service would be provided by a 6-inch water service line and a 6-inch reduced pressure backflow device and lateral.

Wastewater

The project site is located within the City's sewer service boundary. The City's Trunk Sewer system collects wastewater flows from the area surrounding the project site and has a large diameter pipe (approximately 30-inch diameter) that connects to other subsequent downstream sewers. An existing sanitary sewer line and sewer manhole are located within the 47th Street right-of-way. The project would connect to the existing sewer infrastructure via two new sewer lines, a 6-inch lateral and a clarifier for the fire station, and a separate sewer line for the trash enclosure drain. The new sewer lines are proposed to be located under the parking lot and the southern portion of the fire

station building. These lines would then connect to the existing sewer line at the location of the manhole, directly northeast of the proposed fire station.

The wastewater or sewer generation for the project was developed in accordance with the City of San Diego Sewer Design Guide. The 2024 Sewer and Water study prepared by RRM Design Group (Appendix J.1) calculates wastewater generation based on an estimated population (number of employees) of the fire station of 32.1 persons, which conservatively anticipates generation of 10,411 gpd of wastewater. Additionally, the proposed flow added to the downstream sewer system by the wastewater generation would be 8.3% of the total flow (Appendix J.1).

Solid Waste

As noted in Section 5.7, Greenhouse Gas Emission, CalEEMod default values for solid waste generation were used to estimate GHG emissions associated with solid waste. The total solid waste generation for the project is estimated to be 27.83 tons per year.

The proposed project would comply with AB 1327 and AB 34, by following the City's recycling ordinance. The project would also comply with the Construction and Demolition (C&D) Debris Deposit Ordinance by submitting a Waste Management Form with the building permit application demonstrating that at least 75% of the waste generated during project construction would be recycled. The project would also comply with the Refuse, Organic Waste, and Recyclable Material Storage Regulations by providing bins for organic waste and recycling within the trash enclosure. The project would also comply with the City's General Plan waste management policies (PF-I.1. and PF-I.2.), in relation to providing efficient waste collection services and maximizing waste reduction.

Demolition and Construction Waste

As noted in the Regulatory Setting, City projects are not subject to compliance with the SDMC; therefore, the City's C&D (construction and demolition) Debris Diversion Deposit Program would not apply to 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 nearly 100% diversion rate. When comingled materials are sent to a mixed facility, the 75% diversion goal established by AB 341 would not be met. However, the project contractor would ensure source separation of construction debris, consistent with the City's Construction and Demolition Debris Diversion Deposit Program. The program further requires a minimum of 90% of the inert construction waste (material not subject to decomposition such as concrete, rock, dirt, brick, etc.) and 65% of the remaining construction debris generated by the project to be diverted to a recycling facility (City of San Diego 2021c).

The project site currently consists of a vacant, undeveloped site consisting of native/non-native and disturbed habitat. No demolition of structures would occur as part of the project. Site preparation would require ground clearing, grading, and foundation preparation. The project would also involve utility installation/trenching, framing and assembly of the building and associated apparatus bays, paving of parking and driveway areas, and landscaping. The project is assumed to be constructed in one phase. During construction activities, construction equipment and materials would be staged in a temporary off-site location, as described in Chapter 3.

Approximately 0.45 acres (76.3% of the total project site) of the 0.59-acre project footprint would be graded to accommodate the proposed development. The 0.59-acre project footprint consists of 0.33-acre of steep slopes considered Environmentally Sensitive Lands per the SDMC (Chapter 14, Article 3, Division 1, Environmentally Sensitive Lands Regulations), which represents approximately 61% of the total 0.51-acre of the existing steep slopes on the entire project site.

Overall grading would require 1,607 CY of cut, and 5,392 CY of fill, resulting in a net export of 3,785 CY of soil, with a maximum excavation depth of 20 feet. Soil export is expected to be taken to either Hanson Aggregates West – Miramar (9229 Harris Plant Road), Moody's (3210 Oceanside Boulevard) or Terra Bella Nursery (302 Hollister Street). The maximum height of fill slopes would be approximately 7 feet.

Graded slopes would be revegetated in compliance with the project's Landscape Development Plan, in compliance with Section 142.0411 of the SDMC, Section III of the Steep Hillside Guidelines in the Land Development Manual, and other applicable City requirements.

Operational Waste

Operation of the project would involve on-going waste generation from the fire station. It is assumed the project's trash enclosure would provide an organic waste storage area and recyclable material storage area that would accommodate trash and recycling facilities.

Significance of Impact

Water

The project would result in an estimated maximum water demand of 77.6 AFY. The irrigation water demand for the project is estimated to be 121 AFY based on the current landscape plan, resulting in a total demand of 198.6 AFY.

The City's PUD service area total water demand forecast for 2025 is 202,685 AFY (City of San Diego 2021b). The project's estimated maximum annual demand of 198.6 AFY 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.

The project would tie into the City's existing 8-inch water main located in 47th Street, as required by the City's PUD. On-site domestic and irrigation water would be provided by a water service line and meter, along with a Reduced Pressure Backflow Device. Fire service would be equipped with a water service line and a Reduced Pressure Backflow Device and Lateral. The on- and off-site water connections and the environmental impacts of those water connections are addressed within this EIR, including consideration of compatibility with adjacent land uses; effects on drainage, water quality, air quality, aesthetics, and biological resources; and the potential for the project to increase noise levels. Water infrastructure would be designed and sized to meet the project's water needs in conformance with City standards, the construction of which impacts would be **less than significant**.

Wastewater

An existing sanitary sewer line is located within 47th Street. The project would connect to the existing infrastructure via two new sewer lines, a lateral and a clarifier for the fire station, and a separate sewer line for the trash enclosure drain.

The project includes a new point of connection to the existing sewer line but would not result in any modifications to the existing sewer system in the project vicinity. The wastewater connections and the environmental impacts of those water connections are addressed within this EIR, including consideration of compatibility with adjacent land uses; effects on drainage, water quality, air quality, aesthetics, and biological resources; and the potential for the project to increase noise levels. The project's construction impacts associated with installation of the two new sewer lines would be **less than significant**.

Solid Waste

The majority of waste generated during grading and construction would consist of export soil. At least 75% of the soil exported from the site would be sent to facilities for reuse. The project would provide sufficient refuse, organic waste, and recycling containers and would provide sufficient waste diversion. These waste diversion measures, along with the waste reduction measures, would reduce the project impacts related to solid wastes to **less than significant**.

Mitigation

No mitigation is required.

5.14.3.2 Issues 2 and 3: Water

Issue 2: *Would the project result in the use of excessive amounts of water?*

Issue 3: *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 2022), 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 SF of floor space;
 - Commercial office buildings employing more than 1,000 people or having more than 250,000 SF 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 predominately non-drought resistant landscaping and excessive water usage for irrigation and other purposes.

Impact

Water Supply

The project does not require compliance with SB 610 based on its size and water demand. This project does not exceed the threshold set by the City for water supply, as it is less than 500 dwelling units and would not be expected to use the equivalent water supply of a 500 dwelling unit development. The daily and annual water demand for the proposed project is addressed under Issue 1 and the project's water demand aligns with the City's forecasted water demand. The project would not result in excessive water usage and impacts would be less than significant.

Water Conservation

The project would incorporate 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 as required by the California Building Code.

Approximately 6,049 sf of the project site would be landscaped. The proposed landscape plan would include drought-tolerant native vegetation and low water use plants. The landscape scheme would include shrubs of varying heights, a wide selection of cactus and succulents, as well as shade trees. Native vegetation including California Sagebrush and California Encelia would be used to revegetate graded areas. The proposed landscaping plan has been designed in accordance with SDMC Section 142.0402, Land Development Manual, Landscape Standards, and other applicable city and regional standards for landscape installation, irrigation and maintenance as identified in the Design Guidelines. As shown in the Water Budget Landscape Worksheet (Appendix J.2), the project's water demand for landscaping is less than the Maximum Applied Water Allowance (MAWA). A detailed landscape plan and plant palette would be submitted to the San Diego Fire Department for review and approval prior to the issuance of building permits.

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 and Landscaping would include California native drought-tolerant plant palette. Overall, the project would be consistent with applicable water conservation requirements; therefore, impacts would be **less than significant**.

Mitigation

No mitigation would be required.

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5.15 TRIBAL CULTURAL RESOURCES

This section describes the existing physical conditions and cultural context of the proposed Fairmount Avenue Fire Station Project (project) site, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures, if required, related to implementation of the project.

The following analysis is based the Cultural Resources Phase I Inventory Letter Report prepared by Dudek (September 2024) included as Appendix I, and the outcome of consultation with Native American Tribes traditionally and culturally affiliated with the project area who have requested consultation pursuant to Public Resources Code Section 21080.3.

5.15.1 EXISTING CONDITIONS

Physical Conditions

The project APE consists of consists of all areas subject to project impact activities, including ground and foundation preparation, utility installation, framing and assembly of the building and associated apparatus bay, grading and paving the parking lot and driveway areas, vegetation removal, and landscaping. The project APE consists of the 1.28-acre project site which includes an undeveloped parcel of land (APN 541-190-16) that contains a variety of native and non-native vegetation in addition to the project's offsite improvements (see Figure 2-2 in Chapter 2, Environmental Setting). The offsite improvements consist of improvements within the 47th Street right-of-way adjacent to the project site that consist of 0.08-acre and a 0.52-acre temporary offsite construction staging area located south of Sunshine Beradini Park and north of Federal Boulevard (see Figure 3-7 in Chapter 3, Project Description).

Some portions of the project APE have been previously disturbed from the development of 47th Street and Fairmount Avenue, and adjacent residential and commercial development. The project APE is surrounded by residential developments to the east and north, open space to the north and west, and industrial uses and a school south of the project APE. The North Fork of Chollas Creek is located approximately 300 feet northwest of the project APE.

Ethnographic, Religious and Cultural Context

Many areas of San Diego County, including 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 as early as the 1920s, and 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, however, 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's APE. The Kumeyaay are the identified MLD 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 Resources Phase I Inventory Letter Report included as Appendix I of this EIR.

Cultural Resources Inventory

Please see Section 5.12, Historical Resources for a summary on the cultural resources inventory efforts (California Historical Research Information System Records Search Results, Historical Aerial Review, Intensive Pedestrian Survey, Buried Site Sensitivity) and refer to the Cultural Resources Phase I Inventory Letter Report included as Appendix I of this EIR.

Native American Heritage Commission Sacred Lands File

Dudek requested a NAHC search of its SLF on October 27, 2023, for the project APE. The NAHC Correspondence and Tribal Outreach are included in Attachment B of the Cultural Resources Phase I Inventory Letter Report (Appendix I). The NAHC SLF results were received on November 27, 2023, and the results were negative. The NAHC additionally provided a list of Native America tribes and individuals/organizations with traditional geographic associations that might have knowledge of cultural resources in this area.

Outreach letters were mailed on November 29, 2023, to all Native American representatives included on the NAHC contact list. These letters requested additional information relating to Native American resources that may be impacted by the project. Native American representatives were requested to define a general area where known resources intersect the project APE. One response has been received to date. The Baraona Band of Mission Indians responded on December 15, 2023 stating that they are not aware of any specific cultural resources on the project site; however, the site is along a watercourse (Chollas Creek) that is a tributary to the San Diego River in Mission Valley, where ancestors of the Baraona Band lived in pre-contact times, which increases the likelihood that cultural resources are present on or below the surface of the site and wish to have a qualified archaeologist walk the site to determine if there is any indication of surface or buried cultural resources before any ground disturbance occurs.

Tribal Correspondence

The project is subject to compliance with Assembly Bill (AB) AB 52, which requires consideration of impacts to tribal cultural resources as part of the CEQA process. The City notified those California Native American Tribal representatives that have requested notification who are traditionally or culturally affiliated with the geographic area of the project site. The City sent tribal notification letters on August 11, 2020, to the Lipay Nation of Santa Ysabel, Jamul Indian Village, and the San Pasqual Band of Diegueno Mission Indians. On October 21, 2020, additional information was sent to the San Pasqual Band of Diegueno Mission Indians as requested, and they were informed that the project will require Native American monitoring and consultation was closed on this project. All records of correspondence related to AB 52 notification and any subsequent consultation are on file with the City.

5.15.2 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.

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” (California Public Resources Code [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” (California 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 (California 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 (California PRC Section 5097 et seq.) addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; 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

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in California Health and Safety Code Section 7050.5 and PRC Section 5097.98.

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. 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 7050.5[b]). 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 7050.5[c]). In accordance with California PRC Section 5097.98(a), the NAHC will notify the Most Likely Descendant (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. Within 48 hours of being granted access to the site, the MLD may recommend means of treatment or disposition, with appropriate dignity, of the human remains and associated grave goods.

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:

1. California PRC Section 21083.2(g): Defines “unique archaeological resource.”
2. California 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. California PRC Section 21074 (a): defines “Tribal cultural resources” and Section 21074(b): defines a “cultural landscape.”
4. California 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. California 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” (California 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:

- 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 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 (California PRC Section 21084.1; 14 CCR 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 PRC Section 21084.1; 14 CCR 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 PRC Section 21083.2[a]; 14 CCR 15064.5[c][4]).

Pursuant to these sections, the 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 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 Tribal Cultural Resource (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 lead agencies to consult with tribes, if requested by the tribe, and sets the principles for conducting and concluding consultation.

Section 4 of AB 52 adds Sections 21074 (a) and (b) to the PRC, addressing tribal cultural resources and cultural landscapes. Section 21074 (a) defines tribal cultural resources as one of the following:

Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

- a. Included or determined to be eligible for inclusion in the CRHR.
- b. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- c. 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Section 1 (a)(9) of AB 52 establishes that “a substantial adverse change to a tribal cultural resource has a significant effect on the environment.” Effects on tribal cultural resources should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures “capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource.” Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

The City has complied with AB 52 and notified those California Native American tribes that have requested notification who are traditionally or culturally affiliated with the geographic area of the project site.

Local

City of San Diego General Plan

The City's General Plan (Blueprint SD) was recently updated to address adopted plans and to create an equitable and sustainable framework for growth. The General Plan includes a Historic Preservation Element, that seeks “[t]o guide the preservation, protection, restoration, and

rehabilitation of historical and cultural resources and maintain a sense of the City. The following policies from the Historic Preservation Element are applicable to the project:

- HP-A.3.** Foster government-to-government relationships with the Kumeyaay/ Diegueño tribes of San Diego.
- a. Regularly meet with local Tribal governments to discuss issues of mutual concern.
 - b. Formally consult with identified California Native American tribes prior to the adoption or amendment of the General Plan or specific plan or the designation of open space.
 - c. Maintain confidentiality concerning locations of traditional cultural places that are identified through the consultation process and otherwise.
 - d. Support Tribal governments holding conservation easements over land voluntarily set aside for the protection of cultural places.
- HP-A.4.** Actively pursue a program to identify, document and evaluate the historical and cultural resources in the City of San Diego.
- a. Develop context statements specific to areas being surveyed.
 - b. Complete and regularly update a comprehensive citywide inventory of historical and cultural resources in conformance with state standards and procedures. Include community, neighborhood, cultural, and historic preservation groups, property owners, land developers, and the building industry in planning and implementing historic surveys.
 - c. Require that archaeological investigations be guided by appropriate research designs and analytical approaches to allow recovery of important prehistoric and historic information.
 - d. Require the permanent curation of archaeological artifact collections and associated research materials, including collections held by the City. Support the permanent archiving of primary historical records and documents now in public institutions.
 - e. Include Native American monitors during all phases of the investigation of archaeological resources including survey, testing, evaluation, data recovery, and construction monitoring.
 - f. Treat with respect and dignity any human remains discovered during implementation of public and private projects within the City and fully comply

with the California Native American Graves Protection and Repatriation Act and other appropriate laws.

5.15.3 IMPACTS ANALYSIS

5.15.3.1 Issue 1: Significance of a Tribal Cultural Resource

Issue 1: Would the proposal 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 adopted thresholds of significance for potential impacts to TCRs. Therefore, for purposes of this EIR guidance provided by checklist questions listed in Appendix G of the State CEQA Guidelines are used to evaluate the potential for significant impacts to TCRs. Would the project:

1. 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

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 appropriate for providing substantial evidence regarding the locations, types, and significance of tribal cultural resources within their traditionally and cultural affiliated geographic area (California PRC Section 21080.3.1[a]).

As discussed in Section 5.12, Historical Resources, the Cultural Resources Phase I Inventory Letter Report included in Appendix I, and above, the NAHC SLF Search did not identify any sacred lands within the project APE. In addition, a search of the SCIC records and an intensive pedestrian survey did not identify any previously recorded cultural resources within the project APE.

On November 29, 2023, outreach letters were sent to all Native American tribes and individuals/organizations provided by the NAHC that may have knowledge of cultural resources in or near the project area. One response was received from the Baraona Band of Mission Indians on December 15, 2023, stating that they are not aware of any specific cultural resources on the project site; however, the site is along a watercourse (Chollas Creek) that is a tributary to the San Diego River in Mission Valley, where ancestors of the Barona Band lived in pre-contact times, which increases the likelihood that cultural resources are present on or below the surface of the site and requested a qualified archaeologist walk the site to determine if there is any indication of surface or buried cultural resources before any ground disturbance occurs.

The project is subject to compliance with AB 52 to ensure that consultation with tribes is conducted and tribes are allowed the opportunity to provide comments, monitor, and preserve TCRs if found during construction. On August 11, 2020, the City sent AB 52 notification letters to the Lipay Nation of Santa Ysabel, Jamul Indian Village, and the San Pasqual Band of Diegueno Mission Indians. On October 21, 2020, additional information was sent to the San Pasqual Band of Diegueno Mission Indians as requested, and they were informed that the project will require Native American monitoring, and consultation was concluded on this project.

The project site has not been selected as a site recommended for historic designation and is not identified on any of the historic resource lists/databases—the National Register of Historic Places and the California State Historical Landmarks, Points of Historical Interest, and Register of Historic Places or on the City's Register of Historic Resources. However, per consultation with the San Pasqual Band of Diegueno Mission Indians, the project would require Native American monitoring during construction.

No known TCRs have been identified that could be impacted by the project. However, based on the quantity of cultural resources identified within the 1-mile radius of the APE, the APE's close proximity to Chollas Creek, which was prehistorically used by local Native Americans as a valuable source of resources and as a travel route, and the presence of alluvial soils within the APE, ground-disturbing construction activities have the potential to potentially impact unknown TCRs.

Significance of Impact

While no TCRs were identified within the APE during the survey, the project APE is located within close proximity to Chollas Creek, which is an area known to be historically used by local Native Americans. The project would be required to comply with General Plan policy HP-A.4. (e.) which requires Native American monitors be used for construction monitoring. Because ground disturbance associated with construction has the potential to uncover previously unknown TCRs and Native American resources, the impact is considered **potentially significant**.

Mitigation

Mitigation measure **MM-HIST-1** (see Section 5.12, Historical Resources), which requires a monitoring program during grading.

Significance of Impact After Mitigation

Implementation of mitigation measure **MM-HIST-1** (see Section 5.12, Historical Resources) which requires a monitoring program during grading, would ensure potential impacts to unanticipated resources, including TCRs, would be **less than significant**.

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5.16 VISUAL EFFECTS/NEIGHBORHOOD CHARACTER

This section describes the existing visual conditions of the proposed Fairmount Avenue Fire Station Project (project) site, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the project.

5.16.1 EXISTING CONDITIONS

Physical Conditions

The proposed project is located within the MCCP planning area. The Mid-City communities consist of four smaller communities: Normal Heights, Kensington-Talmadge, City Heights, and Eastern Area, each with its own distinctive character and its own community planning group (City of San Diego 2015). The existing visual environment of the City Heights community, in which the project is located, mostly consists of built features including higher-density and low-density residential as well as commercial development and schools, parks, and roads. In addition, areas located within the central and western portions of City Heights occupy a relatively level, developed mesa bisected by a series of canyons, particularly along Chollas Creek and the southern rim of Mission Valley, and these canyons, consisting of parks, trails and publicly owned lands, represent an open space resource for the community. More specifically, the project site is located within the City Heights neighborhood of Ridgeview, which is predominately designated for single-family residential uses (City of San Diego 2015).

Although the project is located in the City Heights neighborhood, immediately east of the site is the Eastern Area community. The Eastern Area is characterized by its hilly topography and more recent development, as compared to the other communities within the MMCP planning area.

The proposed 1.28-acre project site is located approximately 0.5 miles east of Interstate (I) 805, 0.5 miles north of Highway 94, and approximately 200 feet north of the intersection of 47th Street and Fairmount Avenue within the City, on the west side of 47th Street. The project site is in an area characterized by rolling hillsides, where large lot residential development has private views of open space, including Chollas Creek Regional Park, which includes open space areas, trails, the Chollas Creek canyon, and the Chollas Creek itself (City of San Diego 2015).

The project site is comprised of an undeveloped parcel of land covered in vegetation. A portion of the site is partially disturbed from previous road construction (Appendix E.1). Land uses surrounding the project site include low-density residential developments to the north and east, open space to the west and northwest, a trucking company to the south, and an elementary school southeast of the project site.

Existing Landforms

According to the MCCP, “City Heights is located in the central Mid-City plateau and is indented by a number of smaller canyons” (City of San Diego 2015). The project site is located within the Peninsular Ranges Geomorphic Province of California, which is characterized as a series of northwest-trending mountain ranges that are separated by subparallel fault zones and a coastal plain of subdued landforms (Appendix E.1). The existing topographic elevations on the site range from 194 feet amsl in the southeast to 135 feet amsl in the northwest. Over 40% of the site has a slope gradient that exceeds 25% primarily in the western portion (Appendix E.1).

The North Fork of the Chollas Creek and the Chollas Creek Watershed are located approximately 450 feet northwest of the project site. The Chollas Creek Watershed Regional Park runs throughout the city and consists of a network of water channels, parks, trails, and surrounding open space (City of San Diego 2024a). Bounded by Fairmount Avenue to the southwest, 47th Street to the north and east, and Chollas Creek to the northwest, the project site is located within an undeveloped area.

Scenic Highways

According to the California Department of Transportation State Scenic Highway System Map, the project site is not located adjacent to, or in the vicinity of, a designated state scenic highway (Caltrans 2024). The nearest officially designated state scenic highway is State Route (SR) 163, located approximately 3.6 miles west of the project site. Due to distance and intervening terrain, the project site is not visible from SR 163 or any other state scenic highway in San Diego County. While the project site is situated approximately 0.5 miles east of I-805 and 0.5 miles north of Highway 94, these are not included in the State Scenic Highway Program and also have not been designated by the City or Caltrans as scenic roadways.

Scenic Vistas

A scenic vista is typically characterized as a panoramic view or vista from an identified view/vista point, public road, public trail, public recreational area, or scenic highway. The City is currently undergoing a process to update and refresh its General Plan through the Blueprint SD framework process (City of San Diego 2024b).

While the City’s General Plan does not identify designated scenic vistas, the City’s General Plan Program EIR (PEIR - SCH No. 2021070359) indicates that natural scenic vistas are visible from the 36,000 acres of recreational and open space areas in the city and that public views are identified in the City’s various community plans with a varying level of detail (City of San Diego 2024c). Furthermore, General Plan policies require the protection and conservation of landforms, canyon lands, and open spaces that provide public views and vistas (City of San Diego 2024b).

The M CCP identifies public viewpoints within the Mid-City planning area, including the City Heights and Eastern Area communities. The public viewpoints identified in the M CCP are described as views that offer framed public views of panoramic aesthetic features such as open space areas or significant architecture. M CCP further notes that many of the streets on the Mid-City mesa top afford panoramic views of the mountains to the east and the bay and coastline to the west and south. Only one of the identified public viewpoints, which originates from the Eastern Area, is directed toward the project site. However, intervening topography and buildings prevent public views of the project site from the identified location. The M CCP also includes policies that require the protection and enhancement of public and panoramic views (City of San Diego 2015, p. 66).

While not formally designated as a scenic vista, the adjacent Chollas Creek Watershed Regional Park to the northwest consists of a canyon and open space system that includes walking trails which may provide opportunities for visual relief, including views of the project site generally to the east. With the exception of trails in the Chollas Creek Watershed Regional Park, the project site is not clearly visible from a public recreation area in the community.

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 several locations from which the project site may be visible to the public is included. The site and surrounding area were visited on March 27 and March 28, 2024, when conditions were sunny and clear. A map showing the location where photographs were taken, referenced in the discussion below, is provided as Figure 5.16-1, Key Map: Views from the Surrounding Area.

Figure 5.16-1 shows the locations of public views of the project site from surrounding roadways. Figure 5.16-2, Views from 47th Street, includes representative photographs depicting views of the project site from 47th Street. Similarly, Figure 5.16-3, Views from Fairmount Avenue, includes representative photographs depicting views of the project site from Fairmount Avenue. The project site is not visible from I-805, the highway nearest to the site. The project site is visible from Fairmount Avenue, which has views of the site looking east, and also from 47th Street, which is immediately adjacent to the eastern boundary of the project site. Fairmount Avenue continues west of the project site, over the Chollas Creek watershed and canyon, and provides additional views of the project site from up to approximately 1,150 feet away. 47th Street also continues north of the project site and provides additional views of the site from up to approximately 390 feet away where most views of the site are partially blocked by existing vegetation (see Figures 5.16-1 through 5.16-3).

Project Site

The project site is undeveloped and includes slopes with dense to moderately vegetated coastal sage scrub shrubs and chaparral. The varying density and plant species of on-site vegetation can be seen in Figures 5.16-1 through 5.16-3. In visibly disturbed areas on the project site, coastal sage scrub vegetation is intermixed with areas of bare ground or higher levels of soil disturbance. Bare ground is associated with narrow, informal paths that extend from 47th Street onto the project site. In addition to rough textured and generally drab colored native vegetation, limited occurrence of yellow flowering plants (*Viguiera laciniata* -San Diego County sunflower) also exists in portions of the site (see View 2 on Figure 5.16-2 and View 4 on Figure 5.16-3). There are no existing buildings or structures on the project site.

Surrounding Area

The project site is surrounded by low-density residential development to the north, east, and southeast; undeveloped open space (including the Chollas Creek Watershed Regional Park, a canyon, and the intermittent Chollas Creek itself) to the west and northwest; commercial and industrial land south and southeast; and Webster Elementary School to the southeast. The project site and its immediate surrounding area is within the City Heights Ridgeview neighborhood within the MCCP. The neighborhood is delineated by I-805 to the west, Highway 94 to the south, Home Avenue to the north, Euclid Avenue to the east and northeast, as well as Chollas Parkway to the north and 47th Street to the east and south.

According to the MCCP, the northern portion of the Ridgeview neighborhood is primarily composed of single-story, single-family residences, whereas the southern section is predominantly composed of industrial uses (City of San Diego 2015). Residential uses are located north, east, and southeast of the project site while industrial uses are found farther south. These uses generally incorporate tan or white exteriors and white, tan, or gray angled roofs. Streetlights also occur along 47th Street and Fairmount Avenue.

Existing residential development surrounding the project site includes single-family homes immediately to the north, east, and southeast. The residences to the east of the project site are on a hillside that is covered with thick vegetation and, as such, have limited private views of the project site. Residences to the north of the site along 47th Street also have limited views of the site due to the existing vegetation and topography of the site that slopes upward. The surrounding single-family residences are predominantly one-story homes that consist of neutral and light-colored exteriors with white, tan, and gray roofs. Roof colors range from various shades of white, gray, and tan with some having red tile shingles. These homes are served by two-lane neighborhood roads. Unlike the homes associated with the Leisureland Mobile Homes residential development to the north, the

homes east of the proposed project site typically have small, grass (or artificial turf) covered front yards with low shrubs and/or tall trees.

Industrial uses exist southwest of the project site and include the one-story Reddaway trucking company building that has neutral tones and a generally light-colored exterior with a gray rooftop. A two-story FedEx Ship Center also exists southwest of the project site and is also made up of neutral tones and a generally light-colored exterior with a light brown rooftop.

Open space areas border the project site immediately to the west and northwest of the site, including the Chollas Creek Regional Park which includes open space areas, trails, the Chollas Creek canyon, and the Chollas Creek itself. These open space areas are located at an elevation of approximately 134 amsl and are situated at a lower elevation than the project site. This area includes coastal sage scrub vegetation with some taller trees, that provide a partial screening of the project site. Lastly, Webster Elementary School and Holly Drive Leadership Academy are located southeast of the project site and, due to the topography and existing vegetation, do not have any views of the project site.

Existing Light and Glare Conditions

As the project site is undeveloped, no sources of existing light and glare are located on the project site. However, given the developed nature of the surroundings, existing sources of light and glare generated from off-site areas including vehicle lights, residential developments to the north and east, and streetlights on Fairmount Avenue and 47th Street. These lighting sources are typical of residential development. With the exception of glass windows, lights, and traffic signals, sources of glare in the surrounding area are generally limited.

5.16.2 REGULATORY FRAMEWORK

Local

City of San Diego General Plan

The City of San Diego General Plan, recently updated in 2024 to address the City's recently updated Climate Action Plan in addition to other General Plan updates, provides policies related to urban design with the Urban Design Element. The Urban Design Element contains the 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 2024b). 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

- UD-A.1.** Preserve and protect natural landforms and features.
- 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.
- UD-A.4.** Use sustainable building methods in accordance with the sustainable development policies in the Conservation Element.
- UD-A.7.** Design buildings that contribute to San Diego's needs for homes, jobs, services, amenities, and public spaces while establishing a positive sense of community identity.
- UD-A.8.** Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.
- UD-A.10.** Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.
- UD-A.14.** Reduce the amount and visual impact of surface parking lots, as well as the oversupply of parking to provide area for more productive uses (see also Mobility Element).
- UD-A.16.** Design project signage to effectively utilize sign area and complement the character of the structure and setting.

Distinctive Neighborhoods and Residential Design

- UD-C.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.

Mid-City Communities Plan

The Urban Design Element of the M CCP contains goals, objectives, guidelines and proposals to guide the form of development within Mid-City. The M CCP provides applicable policies and guidelines for

achieving the primary goal to maintain and provide much needed awareness and enhancement of the community's natural resources and amenities.

Neighborhoods Plan Element

The MCCP recognizes 27 neighborhoods within the Plan Area's four communities and states that each neighborhood has "its own look, feel, history, and culture," and that "each neighborhood's assets and opportunities can be used to enhance the area's overall character and add to the health and vitality of the entire Mid-City" (City of San Diego 2015). The project site is located in the Ridgeview neighborhood of the City Heights community, but borders the Eastern Area community (see Figure 5 of the MCCP) (City of San Diego 2015).

Natural and Cultural Resources Element

The Natural and Cultural Resources Element within the MCCP states that although Mid-City is an urban environment, it has many natural features that contribute to the quality of the area, including canyons, floodplains, and panoramic views of San Diego's mountains and coastline (City of San Diego 2015). The Visual Resources section of this element states that several streets and other public areas offer framed public views of panoramic aesthetic features like open space or architecture, including views of the mountains to the east and the bay and coastline to the south and west (City of San Diego 2015).

The following guidelines related to visual resources, natural landforms, and open space are relevant to the project:

- **Land Form – Canyons and Creeks**
 - Preserve sensitive slopes, canyons, floodways and other areas designated as open space through acquisition, zoning, resource regulation or other available methods.
- **Open Space Design and Development Guidelines**
 - Establish building setback and landscaping requirements for properties along the edge of designated open space hillsides. Such a restriction would protect slopes from erosion and intrusive vegetation, and would protect buildings from fire hazard and slide damage. Public views from upland and lowland areas would also be preserved and enhanced.
 - Development within or adjacent to a designated Multiple Habitat Planning Area should be consistent with the policies and guidelines for development found in the Multiple Species Conservation Program Subarea Plan.

Urban Design Element

The Urban Design Element of the M CCP states that Mid-City “has an outstanding urban design character with its remaining natural canyons; public views to Mission Valley, downtown, and San Diego Bay; and its walkable neighborhoods; all within easy walking distance to a school or shopping area” (City of San Diego 2015). The Urban Design Element addresses public realm areas which are typically administered by government or other public agencies (City of San Diego 2015).

The following guidelines related to open space are relevant to the project:

- **Open Space and Parks**
 - Revegetate natural hillsides with native or naturalized plant material according to the performance standards found in the Landscape Technical Manual.
- **Chollas Creek**
 - Provide soil erosion and flood protection in a manner sensitive to the park's habitat values, using natural materials that blend with the surrounding environment.
 - Properties along the rim of the park should provide setbacks with landscaping materials consistent with the wetland habitat and ambiance.

Economic Development Element

The following guidelines included in the M CCP Economic Development Element are applicable to the project:

- Design infrastructure and lighting in keeping with district themes where possible.
- Encourage pedestrian activity and the use of public transit through public and private investment in quality streetscape improvements including landscaping, crosswalk paving, lighting and other pedestrian-oriented enhancements. The City's storefront improvement program should be maintained and expanded.

San Diego Municipal Code

The City exempts all public services, such as a fire station from complying with zoning regulations. However, the project would be subject to compliance with City Building Permit requirements and the California Building Code. It is assumed the project would comply with the City's lighting and hillside development standards provided below in addition to the City's design guidelines.

Lighting

Lighting within the City is regulated by the City's Outdoor Lighting Regulations contained in San Diego Municipal Code (SDMC) Section 142.0740 (Outdoor Light Regulations). 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 the 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 and California Electric Code, Federal Aviation Administration).

Glare within the City is controlled by SDMC Section 142.0730 (Glare Regulations), which includes the following regulations:

- 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 steep hillsides. Development regulations for steep hillsides that are categorized as ESL are regulated by SDMC Section 143.0142 (Development Regulations for Steep Hillsides) and requires development in areas with steep hillsides adhere to the design guidelines in the City's Steep Hillside Guidelines in the Land Development Manual and also include erosion control measures. See Section 5.6, Geologic Conditions for specific detail on the City's development requirements in areas with steep slopes, including erosion control measures. Outside of the Multiple Habitat Planning Area (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.

5.16.3 IMPACTS ANALYSIS

5.16.3.1 Issue 1: Vistas or Scenic Views

Issue 1: *Would the proposal 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, 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 (City of San Diego 2022):

- The project would substantially block a view through a designated public view corridor as shown in an adopted community plan or the General Plan or 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.

Impact

Designated Public View Corridors

The City's General Plan notes that natural scenic vistas can be seen from the approximately 36,000 acres of recreational and open space parks in the city. These include Mission Trails Regional Park, Marian Bear Memorial Park, Rose Canyon Open Space Park, Tecolote Canyon Natural Park and Nature Center, San Diego River Park, Los Peñasquitos Canyon Preserve, Black Mountain Open Space Park, and San Pasqual/Clevenger Canyon Open Space Park. However, the General Plan PEIR, completed as part of the document update in 2024, notes that implementation of the General Plan could result in new development and redevelopment that varies in building height, mass, form, and intensity which could block public views of scenic vistas, as identified in the General Plan and applicable community plans (City of San Diego 2024c).

The General Plan PEIR also indicates that public views are generally identified in community plans. The project site is not identified as a protected public view or scenic vista in the MCCP (City of San Diego 2015). The MCCP identifies several public viewpoints in the Mid-City Planning area. The

nearest and only viewpoint directed at the project site is located in the Eastern Area, approximately 0.50 miles east of the project site, near Euclid Avenue (City of San Diego 2015 p.66). No views of the project site are available from this public view point due to intervening topography and buildings. Similarly, no other public viewpoints identified in the MCCP have the potential to provide views of the project due to intervening topography, distance, or direction of the view.

While the proposed project is located adjacent to the Chollas Parkway Open Space, the project has been designed to integrate into and complement the existing topography of the site, consistent with General Plan Policy UD-A.3. Furthermore, the project is not anticipated to block any existing public views of the Chollas Parkway Open Space area as none of the public views identified in the MCCP provide views of the project site, and the General Plan does not identify a scenic vista or public view corridor in the project area. As such, the project would not substantially block a view through a designated public view corridor as shown in an adopted community plan or the General Plan, and there would be no impact.

Public Viewing Areas of a Public Resource

The Visual Resources Element of the MCCP notes that significant views within and outside the greater Mid-City area include framed public views of panoramic aesthetic features such as open space areas or significant architecture. The MCCP further describes that many of the streets on the Mid-City mesa top afford panoramic views of the mountains to the east and the bay and coastline to the west and south. Due to the hilly topography of the site and its immediate surroundings, panoramic views of the mountains or bay are not available in the immediate project area or nearby roadways, including 47th Street and Fairmount Avenue. As such, the project would not have the potential to block framed public views of panoramic aesthetic features.

Further, the project site itself does not contain any significant public resources or vantage points, such as panoramic public views of open spaces, as identified in the MCCP. The proposed fire station would be located in an area that contains undeveloped hillsides that support coastal sage scrub vegetation and is visible from Fairmount Avenue and 47th Street. While views of the surrounding open space and project site are available to motorists and pedestrians, views from these roadways would be experienced over a very brief duration. The open space area west and northwest of the project site along 47th Street features rugged, coastal sage scrub vegetation with some taller trees, that provide a partial screening of the project site (see Figure 5.16-3). The site is also visible from open space areas and walking trails within the adjacent Chollas Creek Watershed, although views of the proposed fire station would be shielded by the proposed retaining wall that would surround the proposed fire station.

As the proposed project site is undeveloped and does not itself feature designated public trails or view corridors, implementation of the project would not impact a significant public view of a panoramic open space area or other aesthetic feature. Similarly, the hillside to the east of the site is developed with private residential properties and does not support public use, and private views from these residences to the project site are limited due to thick vegetation. Thus, the project would not impact a public view from this hillside area and impacts would be less than significant.

Height or Bulk Regulations

The project site includes 1.28 acres, and the proposed fire station would be located in the southeast portion of the site where the terrain is somewhat flatter. The project site is zoned RS-1-7 (Residential-Single Unit), which allows for residential development of up to one dwelling unit for every 5,000 square feet of lot area, and OP-2-1 (Open Space). The City exempts all public services, such as a fire station, from complying with zoning regulations. However, the project would be within the allowed density for the RS-1-7 zone and the following is provided for informational purposes.

The project would result in a change to the visual setting of the project site due to the proposed development. However, as detailed above, the proposed development would not result in substantial view blockage of a public resource from a public area. The proposed development would also not result in the substantial blockage of existing views from the adjacent residential neighborhoods.

The proposed fire station and retaining walls would exceed the allowable height regulations within the RS-1-7 zone. As noted above, the City exempts all public services, such as a fire station, from complying with zoning regulations. Thus, this analysis is provided for informational purposes. The height of the proposed four-story fire station would be 64 feet above grade, which exceeds the maximum allowed height of 35 feet under the RS-1-7 zoning designation. The proposed height of the retaining walls would be 25 feet above grade, which would exceed the maximum allowed height for walls of 6 feet above grade, as shown in Figure 3-4, Proposed Retaining Wall. Despite exceeding height regulations, the proposed development would not block any public views of the project site from the east (looking west) or views of the project site from the west (looking east) that are primarily from private views that are not protected by the City (City of San Diego 2022). Therefore, although the project would exceed height regulations, the project would not result in a substantial view blockage from a public viewing area.

The project would adhere to the City's design guidelines, which include using compatible architectural styles, lot sizes, and setbacks harmonious with the existing community appearance in order to achieve a cohesiveness of character with the surrounding visual environment. In addition, the project has been designed to adapt to the topography of the site and complement the existing

natural topography and hillsides on the project site, through the provision of landscaping and retaining walls. To minimize site grading and to incorporate the existing site topography, a portion of the building would be constructed using the existing hillside (see Figure 3-2 in Chapter 3). The creation of an artificial slope and grading would be required to create a building pad level with 47th Street for project access.

However, the project would not result in a substantial view blockage from a public viewing area of a public resource that is considered significant by the City's General Plan or the MCCP.

Significance of Impact

The project would not substantially block a view through a designated public view corridor as shown in an adopted community plan or the General Plan, as there are no designated view corridors identified in the MCCP or the General Plan that includes the project area. The project would not block views from a public viewing area of a public resource (such as the ocean) and the project would not exceed the allowed height or bulk regulations resulting in blocking views from a public viewing area. Impacts would be **less than significant**.

Mitigation

No mitigation would be required.

5.15.3.2 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 (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; and/or

- 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

Potential for Disorganized Appearance, Conflict with City Codes, and Potential for Monotonous Visual Environment

Development of the project site would be guided by City's design guidelines as outlined in the Urban Design Element of the General Plan. The guidelines include using compatible architectural styles, lot sizes, and setbacks harmonious with the existing community appearance, and are intended to ensure a high standard of architectural design. The guidelines provide design recommendations for proposed buildings that use compatible architectural styles, building heights, lot sizes, and setbacks harmonious with the existing community appearance. Per the design guidelines, the architectural design theme for the project would integrate the unique character of the project site's topography combined with a modern California design. The building would be finished with brown, gray, and light-colored tones and textured materials that are compatible with the surrounding development and the existing native vegetation. The building materials include a concrete and steel design with a series of several terraces and a glass curtain wall to break up the façade, as shown in Figure 3-2, Project Rendering in Chapter 3. To minimize site grading and to incorporate the existing site topography, a portion of the building would be constructed using the existing hillside. The project would also include a Landscape Plan to enhance the character of the building with drought adapted native vegetation that requires minimal maintenance and irrigation needs and would help to screen and soften the retaining walls from public view. The project envisions a climate-appropriate plant palate that would aid in the screening of graded slopes and retaining walls as experienced from locations to the north and west. The project's landscape plan is shown on Figure 3-4, Landscape Plan in Chapter 3. Architectural elevations are depicted on Figure 3-3a through 3-3d, Elevations in Chapter 3. In addition, a three-dimensional, perspective rendering of a proposed building is included on Figure 3-2, Project Rendering. Lastly, other than exceeding the allowable building height, the project would otherwise comply with all City regulations and design guidelines. The project would not result in a disorganized appearance or result in a monotonous visual environment. The impact would be less than significant.

Bulk Scale and Coverage Regulations

Chapter 3, Project Description, provides a breakdown of zoning, density, and site coverage allowed by the applicable City-wide zoning even though the City exempts all public services, such as a fire station, from complying with zoning regulations. The project proposes a fire station that would be constructed within the allowed density for the project site.

Regarding architectural interest, the proposed four-story building would incorporate a concrete and steel structural design with a series of free-standing and building-integrated retaining walls with several terraces. Architectural elevations are depicted in Figure 3-3a through 3-3d, and a three-dimensional rendering of a proposed building is included on Figure 3-1, Project Site Plan in Chapter 3.

Consistent with design policies and guidelines of the M CCP, the project's proposed landscape design would provide character and visual interest through the incorporation of drought-tolerant native vegetation, such as shrubs of varying heights, a wide selection of cactus and succulents, as well as three shade trees. As previously discussed, the project would exceed the allowable building and retaining wall height for the RS-1-7 zone of 35 feet and 6 feet, respectively, but would adhere to the remainder of the City's design guidelines included in the General Plan Urban Design Element. Such design guidelines include design recommendations that use compatible architectural styles, lot sizes, and setbacks harmonious to the existing community appearance, in order to achieve a cohesiveness of character with the surrounding visual environment. To reduce the bulk and scale of the proposed fire station, the building would incorporate the existing site topography by constructing a portion of the building using the existing hillside and incorporates a number of design elements that provide architectural interest.

The fire station would be located in the southeast corner of the 1.28-acre site and would occupy a 0.59-acre footprint leaving a majority of the site undeveloped and in its natural state. The project has been designed to meet the City's setbacks for fire safety and brush management. Although the project is not required to comply with the City's zoning requirements, the project is generally consistent with the zoning of the site. Therefore, the project would not result in significant conflicts with the height, bulk, or coverage regulations of the RS-1-7 zone.

Walls

In order to reduce the grading footprint, retaining walls would be constructed on the project site. The individual walls would feature a maximum length of 555 feet and a maximum height of 25 feet above grade, which exceeds the allowable height of 6 feet for retaining walls. The retaining wall is proposed to surround a majority of the proposed fire station, except for along the site's eastern front along 47th Street where site access would be made available. The project would not require a deviation from the Municipal Code as the City exempts all public services, such as a fire station, from complying with zoning regulations.

The proposed retaining wall surrounding the fire station would be designed to be screened from public view. However, the wall would be above the height allowed under RS-1-7 zone. While the wall would exceed allowable height, it would be screened from public view due to the location of the wall

behind the fire station, the wall's adjacency to existing slopes, and the project's Landscape Plan, which would aim to shield the wall from public view (see Figure 3-4, Landscape Plan). Overall, the retaining wall would be adequately screened from view and would not result in a negative aesthetic impact. The wall would also function as an alternative construction measure to compensate for a reduction in defensible space per the City's wildfire requirements.

Significance of Impact

Implementation of the project would result in changes in the aesthetics of the site and its surroundings. However, through compliance with the City's design guidelines these changes would not be characterized as a negative aesthetic impact. Development of the project site would occur in an organized manner that would be guided by a site plan and would generally be compatible with the surrounding neighborhood. With the inclusion of landscaping the project would not create a negative visual appearance. The retaining wall would be screened from off-site public views due to the location of the wall behind the proposed fire station and existing vegetation, its adjacency to existing slopes, and proposed landscape design features. Therefore, impacts concerning a negative site aesthetic or project would be **less than significant**.

Mitigation

No mitigation would be required.

5.16.3.3 Issues 3 and 4: Compatibility with Surrounding Development and Alteration to the Existing or Planned Character of the Area

Issue 3: *Would the project result in a project 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, a project is considered to have a significant impact if a project would contrast the surrounding neighborhood character. To meet this significance threshold, one or more of the following conditions must apply (City of San Diego 2022):

- 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

Bulk, Height, and Scale

See discussion above under Issue 2 for more information on bulk, height and scale of the project.

Architectural Styles

As discussed above, the development of the project site would be guided by the City's development regulations, which are intended to ensure a high standard of architectural design. The regulations provide design recommendations that use compatible architectural styles, lot sizes, and setbacks harmonious with the existing community appearance. The proposed fire station would integrate the unique character of the project site's topography combined with the diverse architectural forms and styles associated with modern California design. For information regarding the proposed color scheme, see the analysis under Issue 2 above and Figure 3-2. To minimize site grading and incorporate the existing site topography, a portion of the proposed building would be constructed using the existing hillside. The project would also include a Landscape Plan to enhance the character of the building with drought adapted native vegetation that requires minimal maintenance and irrigation needs and to screen the wall from public view. In addition, the architectural design of the proposed fire station would be visually compatible with modern development located in the surrounding area and would consist of colors to complement nearby development.

Overall, the project would be in not stark contrast to adjacent development where the adjacent development follows a single or common architectural theme.

Community Landmark

The City's General Plan does not identify community landmarks in the Mid-City area (City of San Diego 2024b; 2024c). Additionally, no specific community identification symbols or landmarks are identified in the MCCP (City of San Diego 2015). As the project site has not been identified as a

community identification symbol or landmark, the project would not result in the physical loss, isolation, or degradation of a community identification symbol or landmark that is identified in the General Plan, applicable community plan, or local coastal program and there would be no impact.

Project Visibility and Contrast

The project is located in a visible hillside area that is located adjacent to 47th Street and Fairmount Avenue (see Figure 3-2). In addition, the project site is on a hillside above the Chollas Creek canyon within the Chollas Creek Watershed. While the north and eastern portions of the project site are adjacent to 47th Street, intervening terrain and vegetation partially screen the project site from view. Furthermore, the proposed fire station would be located within the southeast corner of the project site along 47th Street, away from views of Fairmount Avenue. The project site would be visible from Fairmount Avenue to the south and west. However, views of the site along this roadway would be experienced over a brief duration. As discussed previously, the project would not strongly contrast with the surrounding development or natural topography through excessive height, bulk, signage, or architectural projections, and the project would adapt to the topography of the site to the maximum extent feasible in order to complement the existing natural topography. Refer to Figure 3-2 for a project rendering. As discussed above under Issue 3, the project would ultimately include features that are consistent with the surrounding area and would not substantially contrast in bulk, height, or scale. Development of the project site would occur in an organized manner that would be guided by a site plan. Although the project is visible from 47th Street and Fairmount Avenue, the project would be compatible with surrounding developments as described above. Therefore, the project would not strongly contrast with the surrounding development or natural topography through excessive height, bulk, signage or architectural projections and the impact would be less than significant.

Significance of Impact

Incompatibility with Surrounding Development

Through compliance with the City's design guidelines and development regulations, the construction of a four-story fire station would not result in bulk, scale, materials, or style which would be incompatible with surrounding development. Thus, the project would not result in significant impacts related to bulk, scale, materials, or style which would be incompatible with surrounding development and impacts would be **less than significant**.

Mitigation

No mitigation would be required.

5.16.3.4 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, 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 (City of San Diego 2022).

Impact

No distinctive or landmark trees were identified on the project site, and there are no distinctive or landmark trees designated in the project area in the City's General Plan or the MCCP (City of San Diego 2024b; 2015). The surrounding area does support some eucalyptus and willow trees; however, these species are not designated as distinctive, landmark, or a mature stand in local planning documents and are not located on the project site. Therefore, implementation of the project and development of the site as proposed would not result in the loss of any distinctive or landmark trees. No impact related to a loss of any distinctive or landmark tree(s) or stand of mature trees as identified in the community plan would occur.

Significance of Impact

There are no community identification symbols or landmark trees designated on the project site. Therefore, implementation of the project would not result in the loss of any distinctive or landmark trees. **No impact** would result.

Mitigation

No mitigation would be required.

5.16.3.5 Issue 6: Substantial Change in the Existing Landform

Issue 6: *Would the project result in a substantial change in the existing landform?*

Thresholds

According to the City's CEQA Significance Determination Thresholds, 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. In addition, one or more of the following conditions (1–4) must apply to meet this significance threshold (City of San Diego 2022):

1. The project would disturb steep hillsides in excess of the encroachment allowances of the Environmentally Sensitive Lands 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 San Diego Municipal Code 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

As discussed above in the Existing Setting, the project site includes slopes that range up to 25% primarily in the western portion. The project proposes to develop on the southeast portion of the site where the land is relatively flat, and grades are between 1% and 5% (Appendix E.2). The project would grade less than half of the 1.28-acre site but would require recontouring some of the existing slopes at a 2:1 slope ratio to create a level pad. The project would also require a total cut amount of 1,607 cubic yards of soil and the maximum height of fill slopes would be approximately 7 feet (Figure 3-5, Grading Plan). However, the project would not result in any disturbance of steep hillsides or the construction of manufactured hillsides with a slope greater than 50% on the project site. The project would also not exceed the City's significance thresholds for landform alternations. The MCCP also identifies a general desire to preserve hillside topography throughout the community.

The proposed grading of the project site is designed to retain the majority of the site as open space in order to reduce the overall grading footprint and integrate the proposed building into the hillside. This would be achieved by providing a series of free-standing and building integrated retaining walls. The retaining walls would be located along the perimeter of the proposed building, as shown in Figure 3-1. The project is also seeking to balance the proposed walls with the grading footprint to minimize the footprint associated with the walls and proposed terracing. Therefore, while the project would exceed the City's significance thresholds for landform alterations by using more than 2,000 cubic yards of earth per graded acre, the project meets all three of the conditions provided in the City's significance guidelines thus, the landform alteration impact would not be considered significant. In addition, the project would maintain the existing topography of the site to the maximum extent feasible in order to complement the existing natural topography and hillsides through providing landscaping and integration of existing slopes. Ultimately, the project would preserve approximately 0.9 acres of the 1.28-acre site as open space (Appendix F.2). While the project would develop within a hillside area, the proposed development would be designed to integrate into the hillside with terracing and use of walls that minimize the grading footprint as well as the preservation of approximately 70% of the project site as on-site open space (Appendix F.2).

Significance of Impact

The proposed project would not result in a significant impact related to a substantial change in the existing landform. Therefore, impacts would be **less than significant**.

Mitigation

No mitigation would be required.

5.16.3.6 Issue 7: Light and 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, a project is considered to have a significant impact if a project would (City of San Diego 2022):

- 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

Lighting

The project site is located in an urbanized area that contains existing sources of lighting associated with development and street lighting along 47th Street and Fairmount Avenue. Development of the project would introduce lighting to a site that is currently vacant and does not contain or support existing lighting. New lighting at the project site would include building lights and lighting for parking areas and walkways. In addition, the project would introduce interior lighting within the proposed fire station and proposed signage.

It is assumed all lighting would be in compliance with the standards contained in the City's Outdoor Lighting Regulations (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. Specifically, the Municipal Code requires the installation of "acceptable" lighting fixtures that are fully shielding and with the exception of "period" style fixtures, directed downward. Further, new sources of lighting including exterior mounted building lights and security lighting, shall be operated with control systems in place to ensure unnecessary lighting is not left on throughout the night. In addition, due to the site's proximity to open space that may support sensitive biological resources, Section 142.0740(c)(6) requires exterior lighting to be limited to low level lights that are shielded. Therefore, exterior lighting would be

directed away from the MHPA and would be low-level so as to not unnecessarily illuminate off-site areas. Furthermore, a 6-foot-tall wall along the southern project boundary would provide additional shielding of any light from the project. Compliance with the Municipal Code would minimize and restrict project-related nighttime light pollution and light trespass onto adjacent properties. The impact would be less than significant.

Glare

Glare can result from sunlight or from artificial light reflecting off building exteriors, such as glass windows, metal roofs or other highly reflective surface materials. Squinting or turning away from a light source is an indication of glare. Per the City's design guidelines, the proposed building would incorporate a concrete and steel structural design with a series of free-standing and building-integrated retaining walls with several terraces. The use of reflective building materials and finishes, as well as reflective lighting structures and metallic surfaces, would be minimized in order to impede the creation of project-generated glare. Glare resulting from sunlight reflecting off building exteriors can be reduced with design features that use low-reflective glass and exterior materials and colors that absorb, rather than reflect, light. As previously stated, all proposed lighting would be in compliance with the standards contained in the City's Outdoor Lighting Regulations (Municipal Code Section 142.0740), which includes measures to minimize the negative impacts of 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. The impact would be less than significant.

Significance of Impact

Through compliance with the City's Municipal Code, the 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 does 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

No mitigation would be required.

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SOURCE: RRM Design 2024; SANGIS 2023, 2024

FIGURE 5.16-1

Key Map: Views from the Surrounding Area

Fairmount Avenue Fire Station

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Key View 4: View looking north towards the Project Site

Key View 5: View looking northeast towards the Project Site

Key View 6: View looking east towards the Project Site

FIGURE 5.16-3

Views from Fairmount Avenue

Fairmount Avenue Fire Station

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5.17 WATER QUALITY

This section describes the existing water quality conditions of the proposed Fairmount Avenue Fire Station 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 Preliminary Drainage Study, prepared by RRM Design Group (January 29, 2020), which is included as Appendix F.2 and the Storm Water Quality Management Plan prepared by RRM Design Group (July 30, 2019) (Appendix F.3).

5.17.1 EXISTING CONDITIONS

Physical Conditions

The project site is undeveloped sloping land covered in vegetation where the existing drainage occurs as sheet flow in a northerly to northwesterly direction over the moderate to steeply sloping natural hillside. The existing topographic elevations range from 194 feet amsl in the southeast to 140 feet amsl in the northwest (Appendix F.2). Over 40% of the site has a slope gradient that exceeds 25%. An existing storm drain line that collects flows from 47th Street crosses under a portion of the site and daylight at the bottom of the site slope at the north of the site and drains offsite towards Chollas Creek (Appendix F.2). All runoff from the project site also drains north to Chollas Creek which is identified as impaired by benthic community effects¹ and sediment toxicity (Appendix F.3).

The Chollas Creek Watershed encompasses approximately 16,270 acres consisting predominately of urbanized land located within the County. The drainage area to the northern fork of the watershed (9,276 acres) is larger than that to the southern fork (6,997 acres). The drainage area of the Chollas Creek Watershed originates in the cities of Lemon Grove and La Mesa. Chollas Creek flows through the City and empties into the eastern shoreline of San Diego Bay. Though much of the creek has been channelized, downstream of the project area, there have been efforts to restore natural flow in the watershed.

Chollas Creek is part of the Pueblo San Diego subwatershed of the larger San Diego Bay Watershed. The San Diego Bay Watershed Management Area (WMA) is estimated to be home to approximately one-third of the population of the County. It is the largest WMA located entirely within the boundaries of the County and includes three major subwatersheds: Pueblo San Diego, Sweetwater, and Otay.

¹ A benthic community is an area where a group of marine organisms live and interact with each other on, near, (or in any water setting including lakes and rivers or within the seafloor).

The San Diego Bay WMA supplies many local residents with potable water sourced from one of four reservoirs: Sweetwater, Loveland, and Upper and Lower Otay reservoirs. Other major water bodies include the Sweetwater River, Otay River, and Chollas Creek. According to the San Diego Bay WMA Water Quality Improvement Plan, the priority pollutants identified in the Pueblo San Diego subwatershed are bacteria, dissolved copper, lead, and zinc (City of San Diego 2016; City of San Diego 2024a).

The existing beneficial uses for Chollas Creek according to the 2021 San Diego Region Water Quality Control Plan include municipal and domestic water supply, potential for contact water recreation, non-contact water recreation, warm freshwater habitat, and wildlife habitat (RWQCB 2021).

The project site is located in the Coastal Plain of San Diego Groundwater Basin (No. 9-033). The groundwater beneficial uses include municipal and domestic water supply (RWQCB 2021).

5.17.2 REGULATORY FRAMEWORK

Federal

Clean Water Act

The 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. 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 the implementation of portions of the CWA to the SWRCB and RWQCB, including water quality control planning and control programs such as the NPDES program. The NPDES program is a set of permits designed to implement the CWA that apply to various activities that generate pollutants with the potential to impact water quality.

Section 303 of the CWA requires states to adopt water quality standards for all surface waters of the United States. Section 304(a) requires the 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. Section 303(c)(2)(b) of the CWA requires states to adopt numerical water quality standards for toxic pollutants for which the EPA has published water quality criteria and which reasonably could be expected to interfere with designated uses of a water body.

Section 303 of the Clean Water Act (Beneficial Use and Water Quality Objectives)

The RWQCB is responsible for the protection of the beneficial uses of waters within the project area in the County. The RWQCB uses its planning, permitting, and enforcement authority to meet its responsibilities adopted in the Basin Plan for the San Diego Basin (RWQCB 2021) to implement plans, policies, and provisions for water quality management.

In accordance with state policy for water quality control, the RWQCB employs a range of beneficial use definitions for surface waters, groundwater basins, marshes, and mudflats that serve as the basis for establishing water quality objectives and discharge conditions and prohibitions. The Basin Plan has identified existing and potential beneficial uses supported by the key surface water drainages throughout its jurisdiction (RWQCB 2021). Under CWA Section 303(d), the state of California is required to develop a list of impaired water bodies that do not meet water quality standards and objectives. A TMDL defines how much of a specific pollutant/stressor a given water body can tolerate and still meet relevant water quality standards. The RWQCB has developed TMDLs for select reaches of water bodies.

Section 402 of the Clean Water Act (National Pollutant Discharge Elimination System)

The NPDES permit program, as authorized by Section 402 of the CWA, was established to control water pollution by regulating point sources that discharge pollutants into waters of the United States (33 USC 1342). In the state of California, the U.S. Environmental Protection Agency (EPA) has authorized the SWRCB permitting authority to implement the NPDES program.

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 both surface and groundwater) and directs the RWQCB to develop regional basin plans. Section 13170 of the California Water Code also authorizes the SWRCB to adopt water quality control plans on its own initiative. The 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 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.

All 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 (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 projects.

NPDES Construction General Permit

Construction activities exceeding one acre (or meeting other applicable criteria) are subject to pertinent requirements under the NPDES Construction General Permit (Order WQ 2022-0057 DWQ). This permit was 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 in 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 economically achievable and/or best conventional pollutant control technology levels of treatment, with these requirements implemented through applicable BMPs. While 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 City standards (as outlined below), as well as additional sources including the California Stormwater Quality Association's (CASQA's) Stormwater Best Management Practices Handbooks. 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

While shallow groundwater is not expected to occur on site, according to the site-specific geotechnical investigation (Appendix E.1), if project-related construction activities entail the discharge of extracted groundwater into receiving waters, the City would be required to obtain coverage under the NPDES 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 project would require a groundwater permit.

NPDES Municipal Permit

The NPDES MS4 Permit implements a regional strategy for water quality and related concerns and mandates a watershed-based approach that often encompasses multiple jurisdictions. The overall permit goals include (1) providing a consistent set of requirements for all co-permittees; and (2) allowing the co-permittees to focus their efforts and resources on achieving identified goals and improving water quality rather than just completing individual actions (which may not adequately reflect identified goals). Under this approach, the co-permittees are tasked with prioritizing their individual water quality concerns, as well as providing implementation strategies and schedules to address those priorities. MS4 Permit conformance entails considerations such as receiving water limitations (e.g., Basin Plan criteria as outlined below), waste load allocations and numeric water quality-based effluent limitations. Specific efforts to provide permit conformance and reduce runoff and pollutant discharges to the maximum extent practicable involve methods such as (1) using jurisdictional planning efforts (e.g., discretionary general plan approvals) to provide water quality protection; (2) requiring coordination between individual jurisdictions to provide watershed-based water quality protection; (3) implementing appropriate 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.

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 effect or impact on the beneficial uses of water. Specifically, the Basin Plan is designed to accomplish the following:

- 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 City projects are outlined in the City's Stormwater Standards Manual (City of San Diego 2024b). The Stormwater Standards Manual constitutes the City's implementation of the 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.

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. Form DS-560 was completed for the proposed project and included in Appendix F.3. 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. Additional criteria require 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 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 further 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 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. The ordinance also requires the implementation of BMPs required 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 of San Diego General Plan addresses water quality concerns in the Public Facilities, Services, and Safety Element; and the Conservation Element. Goals and policies relevant to the project are listed 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 (e.g., the NPDES) (City of San Diego 2024a). Specific policies include:

- PF-G.1.** Ensure that all storm water conveyance systems, structures, and maintenance practices are consistent with the federal Clean Water Act and California Regional Water Quality Control Board NPDES 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.3.** Meet and preferably exceed regulatory mandates to protect water quality 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

This 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 2024a). Specific policies include:

- CE-E.2.** Apply water quality protection measures to land development projects early in the process-during project design, permitting, construction, and operations-in order to minimize the quantity of runoff generated on-site, the disruption of natural water flows and the contamination of storm water runoff.
 - a. Increase on-site infiltration, and preserve, restore or incorporate natural drainage systems into site design.
 - b. Direct concentrated drainage flows away from the MHPA and open space areas. If not possible, drainage should be directed into sedimentation basins, grassy swales or mechanical trapping devices prior to draining into the MHPA or open space areas.

- c. Reduce the amount of impervious surfaces through selection of materials, site planning, and street design where possible.
- d. Increase permeable areas for new trees and restore spaces that have been paved, focused in areas with the greatest needs.
- e. Increase the use of plants in drainage design.
- f. Maintain landscape design standards that minimize the use of pesticides and herbicides.
- g. 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.
- h. Apply land use, site development, and zoning regulations that limit impacts on, and protect the natural integrity of topography, drainage systems, and water bodies.
- i. Enforce maintenance requirements in development permit conditions.
- j. Increase the use of green infrastructure, both at watershed scale and site-specific locations.

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.

CE-E.4. Continue to participate in the development and implementation of Water Quality Improvement Plans for water quality and habitat protection.

CE-E.5. Assure that City departments continue to use “Best Practice” procedures so that water quality objectives are routinely implemented.

- a. Incorporate water quality objectives into existing regular safety inspections.
- b. Follow Best Management Practices and hold training sessions to ensure that employees are familiar with those practices.
- c. Educate City employees on sources and impacts of pollutants on urban runoff and actions that can be taken to reduce these sources.

- d. Ensure that contractors used by the City are aware of and implement urban runoff control programs.
- e. Serve as an example to the community-at-large.

CE-E.6. Continue to encourage “Pollution Control” measures to promote the proper collection and disposal of pollutants at the source, rather than allowing them to enter the storm drain system.

- a. Promote the provision of used oil recycling and/or hazardous waste recycling facilities and drop-off locations.
- b. Review plans for new development and redevelopment for connections to the storm drain system.
- c. Follow up on complaints of illegal discharges and accidental spills to storm drains, waterways, and canyons.

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

5.17.3 IMPACTS ANALYSIS

5.17.3.1 Issue 1 and 2: Pollutant Discharge and Local and Regional Water Quality

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

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

Thresholds

The City’s Significance Determination Thresholds (City of San Diego 2022) note that compliance with applicable City Water Quality Standards is considered adequate to preclude surface water quality impacts. Because the project does not involve activities that could directly affect groundwater quality (e.g., underground fuel storage tanks or septic systems), potential impacts to groundwater quality are 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 stormwater standards is the applicable threshold for both surface and groundwater water resources.

Impact

Potential project-related pollutant discharge and water quality impacts are associated with both short-term construction activities related to the project and long-term maintenance and operation activities.

Short-Term Construction Impacts

Proposed site clearing, grading, excavation, and construction activities associated with the project could create additional sources of polluted runoff, which could have short-term impacts on surface water quality. Pollutants associated with construction equipment and activities could degrade water quality if those pollutants are allowed to be discharged offsite. Sediment is often the most common pollutant associated with construction sites because of the associated 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. These activities could impact aquatic habitat, upland wildlife, and general water quality of receiving waters.

Under the NPDES permit program, BMPs are mandated for construction sites in which grading would be greater than 1 acre. Preparation of a SWPPP is also required which would reduce the potential of pollutants to be deposited into surface water. The SWPPP would be submitted to the RWQCB prior to ground-disturbing activities to review and confirm the measures that would be employed during construction to avoid runoff into surface waters. Temporary construction BMPs would typically include street sweeping, proper waste disposal, vehicle and equipment maintenance, designated concrete washout areas, designated materials storage areas with runoff protection, minimization of hazardous materials, and proper handling and storage of hazardous materials. Typical erosion and sediment control BMPs include the use of silt fences, fiber rolls, gravel bags, temporary desilting basins, temporary ditches or swales, stormwater inlet protection, and soil stabilization measures. Implementation of these state-mandated BMPs and implementation of the required SWPPP would ensure that short-term impacts from construction-related activities would not violate any water quality standards or waste discharge requirements and not further contribute to water quality impacts identified in the CWA Section 303(d) List of Water Quality Limited Segments.

Furthermore, the project would also be required to comply with all of the City's stormwater standards, including Municipal Code Chapter 14, Article 2, Division 2: Storm Water Runoff and Drainage Regulations, which prohibits 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. The project is a Priority Development Project, and a Storm Water Quality Management Plan was prepared (Appendix F.3).

With implementation of a SWPPP, BMPs, 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

The project site is located on a hillside and, as detailed in Section 5.9, Hydrology, stormwater runoff from the site currently flows overland to the north, northwest until finally discharging into Chollas Creek. With the implementation of the project, the graded portion of the site would increase the impervious area from 0 to 84% of the 0.45-acre development area.

Detention and water quality treatment facilities (i.e., biofiltration units) would be included as part of project design plans in accordance with the requirements of the City's Municipal Code and RWQCB MS4 Permit. The City's Stormwater Standards Manual, which is the jurisdiction-specific BMP manual for the City, addresses updated on-site post-construction stormwater requirements for standard projects and priority development projects and provides updated procedures for planning, preliminary design, selection, and design of permanent stormwater BMPs based on the performance standards presented in the MS4 Permit. All of the project's proposed BMPs would be designed per City specifications and the drainage study recommendations. Implementation of post-construction BMPs, and preparation and implementation of the required SWPPP would ensure that the project would comply with the City's ordinances and with the standards set forth in the City's Stormwater Standards Manual that are designed to protect water quality of receiving waters. Site-specific source control BMPs could include prevention of illicit discharges, storm drain stenciling, integrated pest management principles, and efficient landscape and irrigation design. The project's proposed treatment BMPs include a subsurface biofiltration unit and detention vault. The project's proposed drainage system would be constructed to ensure retention of stormwater runoff such that stormwater flows would not exceed existing runoff rates to prevent downstream erosion and provide onsite treatment of stormwater runoff prior to offsite discharge. Project-specific site design, source control, and treatment control BMPs, Low Impact Development practices, and project design measures would be implemented to ensure proposed water quality would not degrade further beyond existing conditions. Therefore, runoff from the project site would not adversely affect surface waters, water quality, or discharge pollutants to an already impaired water body.

Significance of Impact

Through implementation of project-specific site design, source control, treatment control BMPs, Low Impact Development practices, project design measures, related maintenance efforts, and conformance with City stormwater standards and associated requirements (including the NPDES Construction General, NPDES MS4, and Municipal Code), potential pollutant discharge and water quality impacts associated with construction and operation of the project would be **less than significant**.

Mitigation

No mitigation would be required.

5.18 WILDFIRE

This section describes the existing wildfire conditions of the proposed Fairmount Avenue Fire Station Project (project) site, identifies regulatory requirements, evaluates potential impacts, and identifies mitigation measures if applicable related to implementation of the project.

This section was informed, in part, by information available from CAL FIRE, the SDFD, and a Fire and Fuel Load Modeling Report (FFLMR) (Dudek 2024) prepared for the project included as Appendix K.

The FFLMR provides an analysis of the project's existing conditions, regulatory requirements, impacts and mitigation measures. It is important to note upon reviewing the Regulatory Framework which includes brush management zones, alternative compliance and San Diego Chapter 7A (5.18-16 -5,18.17) fire resistance construction is being provided proactively and not a regulatory requirement because the project site is not in a Very High Hazard Severity Zone.

5.18.1 EXISTING CONDITIONS

Existing Physical Conditions

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 of San Diego (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. For example, the January 2025 Palisades and Eaton wildfires in the Los Angeles area occurred during high Santa Ana winds after a period of drought. Prolonged winds led to historic levels of damage. The City contains over 500 linear miles of WUI due to established development along the open space areas and canyons within urban and suburban areas (City of San Diego 2019).

The project site is located at the top of a canyon, directly north of the intersection of 47th Street and Fairmount Avenue, situated on the west side of 47th Street. The area is bounded by Fairmount Avenue to the southwest, 47th Street to the north and east, and Chollas Creek and the Chollas Parkway Open Space to the northwest (see Figure 2-1, Project Location).

Topography and Terrain

Topography affects wildfire movement and spread. Steep terrain typically results in faster fire spread due to pre-heating (and drying) of uphill vegetation. Flat areas typically result in slower fire spread, absent of windy conditions. Topography may form unique conditions which 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.

The topography on and near the project site slopes down to a flat basin bottom from the north, east and south with steeper hillsides identified on the east side that intersect the project site. The elevation ranges from approximately 135 feet to 200 feet amsl in areas surrounding the project site.

The project site generally slopes downward towards the north and west. Site elevations on the site range from 194 feet amsl in the southeast to 140 feet amsl in the northwest (Appendix F.2). Over 40% of the site has a slope gradient that exceeds 25%.

Vegetation Communities and Land Covers

The vegetation communities and land cover types found on the project site are described in detail in the Biological Resources Technical Report prepared for the project (see Appendix D). In summary, the vegetation communities and land cover types include coastal sage scrub (including disturbed variety), coastal sage scrub (*Baccharis*-dominated), coastal sage scrub (*Rhus*-dominated), mixed chaparral, ornamental plantings, disturbed land, southern willow forest, and southern riparian forest (see Appendix D).

The site's vegetation fire risk is primarily determined by project-adjacent vegetation that will be preserved in the open space directly adjacent to the site's brush management zones. 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 within and adjacent to the site represents the site's fuel load, an important component of the site's wildfire risk assessment. Offsite fuels that influence wildfire risk adjacent to the project site include Coast live oak, Southern Willow Scrub, and western sycamore Riparian with non-native chaparral and shrub understory occurring in the riparian forest located approximately 160 feet north/northwest of the study area.

Fire Hazard Mapping

The CAL FIRE FRAP database includes map data documenting areas of significant fire hazards in the state. These maps categorize geographic areas of the state into different 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 SRA, LRA, and Federal Responsibility Areas.¹ Fire hazard severity classifications take into account vegetation, topography, weather, crown fire production, and ember production and movement. As shown in Figure 5.18-1, the project site is within a LRA and classified as non-Very High Fire Hazard Severity Zone because it falls outside of the fire hazard zones shown on the figure (CAL FIRE 2025). The nearest Very High FHSZs are located approximately 2.75 miles north and 3.3 miles west of the project site within an LRA. The nearest SRA is located over 5 miles southeast of the project site. However, the City has its own FHSZ maps separate from CAL FIRE, which shows the areas immediately surrounding the project site to be in a Very High Fire Hazard Severity Zone, including Fairmount Avenue, 47th Street, and adjacent development, as shown on Figure 5.18-2. The project site is not designated as a Very High FHSZ.

According to the City's General Plan, the Fire-Rescue Department maintains the fire hazard severity zone map. The map identifies CAL FIRE's Very High FHSZ and the City's Very High FHSZ classifications for the LRA. The Fire Hazard Severity Zone Map from the CAL FIRE is codified in the SDMC. The Very High FHSZs identified on this map are located throughout the city. Inclusion within these zones is based on five factors: (1) density of vegetation; (2) slope severity; (3) five-minute fire department response time; (4) road class/proximity, and (5) proximity to fire hydrants and California Department of Forestry and Fire Protection's vegetation cover and fire behavior/fuel spread model. Based on these factors, areas identified as 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 as shown on Figure 5.18-2 (City of San Diego 2024a).

Fire History

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. 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 have spread.

According to available data from CAL FIRE's FRAP database (FRAP 2018), approximately three (3) fires have burned within 5 miles of the project site since the beginning of the historical fire data record (see Figure 5.18-3). These fires occurred between in 1944 and 1985. There have been no fires in the historical record that have affected the project site. The San Diego Fire and Rescue Department (SDFRD) may have data regarding smaller fires (less than 10 acres) that have occurred near the site that are not included in CAL FIRE's dataset.

¹ Areas where CAL FIRE is responsible for wildland fire protection includes lands owned or managed by the state or where the state is financially responsible for the prevention and suppression of wildfires, classified as a State Responsibility Area. In areas where local fire protection agencies are responsible for wildfire protection, the land is classified as a Local Responsibility Area. The same is true for lands under the jurisdiction of the federal government.

Based on an analysis of this fire history dataset, specifically the years in which the fires burned, the average interval between wildfires burning within a 5-mile radius of the project site was calculated to be approximately 25 years with intervals ranging between 4 and 37 years. Based on this analysis, along with changes in the watershed over the last few decades that resulted in conversion of fuels to lower flammability within developed areas due to urbanization, the project area is expected to be subject to wildfire that may include smaller fires during typical weather conditions and has the potential for larger wildfires during extreme weather conditions, but lacks consistent fuels to result in a larger fire on the project site.

Surrounding Land Uses

The project site is located within the eastern portion of the Multi-Habitat Planning Area (MHPA), a subset of the City's adopted Multiple Species Subarea Plan (Subarea Plan). The Subarea Plan is characterized by urban land uses with approximately three-quarters either built out or retained as open space/park system. The project site is located within the eastern portion of the MHPA, as depicted on Figure 5.4-2 in Section 5.4, Biological Resources. The MHPA is a "hard line" preserve 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). The MHPA is considered an urban preserve that is constrained by existing or approved development and is comprised of habitat linkages connecting several large core areas of habitat.

Climate, Weather, and Wind

The project area is influenced by the Pacific Ocean and is 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 70°F, with average highs in the summer and early fall months (July–October) reaching 76°F. The average precipitation for the area is approximately 10.4 inches per year, with the majority of rainfall concentrated in the months of December (1.5 inches), January (2.1 inches), February (1.7 inches), and March (2.0 inches), while smaller amounts of rain are experienced during the other months of the year (Weather Atlas 2024).

The prevailing wind pattern is from the west (on-shore), 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 2 miles per hour (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.

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 mph and 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. Winds funneled through mountains and onto the flat mesas dissipate and produce lower average wind conditions.

Emergency Response

The SDFD provides fire and emergency services throughout the city. The SDFD's service area spans 343 square miles and serves a population of 1,419,845 (SDFD n.d.a). As noted in Section 4.11, Public Services, the SDFD has 52 fire stations, employs 892 uniformed fire personnel, 98 permanent uniformed lifeguard personnel, and 246 civilian personnel. The City's Fire-Rescue Department has Automatic Aid agreements with jurisdictions adjoining the city (City of San Diego 2024a). These agreements assure that the closest engine company responds to a given incident regardless of which jurisdiction it represents. Mutual Aid agreements with county, state, and federal agencies further allow the City, and any other participating agency, to request additional resources depending on the complexity and needs of a given incident, such as wildfires.

According to the City of San Diego's General Plan – Public Facilities, Services and Safety Element, building new or expanded fire and rescue facilities requires significant planning and coordination to address facility location, funding and the timing of development. Per General Plan Policy PF-D.1, first responders should arrive within 7.5 minutes to treat medical patients and control small fires, 90 percent of the time, and multiple units should respond within 10.5 minutes for serious emergencies, 90 percent of the time (City of San Diego 2024a).

5.18.2 REGULATORY FRAMEWORK

Federal

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 times 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 (ICC 2021).

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. The project site is located in a LRA and classified as a Non-Very High FHSZ (CAL FIRE 2009).

California Code of Regulations

Title 24 California Building Standards Code

Part 2 of Title 24 contains the California Building Code (CBC). Chapter 7 of the CBC includes provisions that govern the materials, systems and assemblies used for structural fire resistance.

California Fire Code

Part 9 of 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.

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.

California Public Resources Code

California PRC 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, local ordinance, rule, or regulations or whichever requirement is more restrictive. Further, PRC 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.

California Public Utilities Commission

Rule 37 of California Public Utilities Commission's (CPUC) general order 95 details Basic Minimum Allowable Vertical Clearance of Wires above Railroads, Thoroughfares, Ground or Water Surfaces Also Clearances from Poles, Buildings, Structures or Other Objects (CPUC 2020).

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. The city has mutual aid agreements with adjacent jurisdictions.

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.

County of San Diego Multi-Jurisdictional Hazard Mitigation Plan

The County Multi-Jurisdictional Hazard Mitigation Plan is implemented by the County Office of Emergency Services. The Multi-Jurisdictional Hazard Mitigation Plan is a County-wide plan that identifies risks posed by natural and human-caused disasters and discusses ways to minimize potential damage occurring as a result of these disasters. The plan is intended to serve many purposes, including enhancing public understanding and awareness of potential hazardous situations, creating a decision tool for managing hazards, promoting compliance with state and federal program requirements, enhancing local policies for hazard mitigation capability, providing inter-jurisdictional coordination, and achieving regulatory compliance (County of San Diego 2023).

Operational Area Emergency Operations Plan

The Office of Emergency Services implements the Operational Area Emergency Operations Plan in collaboration with the Unified San Diego County Emergency Services Organization. The plan is for use by the County and all of the cities within the County to respond to major emergencies and disasters. It describes the roles and responsibilities of all County departments (including many city departments), as well as the relationship between the County and its departments and the jurisdictions within the County. The plan contains 16 annexes detailing specific emergency operations for different emergency situations (County of San Diego 2022).

City of San Diego General Plan

Multiple elements of City's General Plan (City of San Diego 2024a) 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.3h.** 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 plants for fire protection to ensure public safety in some areas.

- UD-A.3p.** 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.1.** Locate, staff, and equip fire stations to meet established response times as follows:
- a. To treat medical patients and control small fires, the first-due unit should arrive within 7.5 minutes, 90 percent of the time from the receipt of the 911 call in fire dispatch. This equates to 1-minute dispatch time, 1.5 minutes company turnout time and 5 minutes drive time in the most populated areas.
 - b. To provide an effective response force for serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911-call receipt in fire dispatch, 90 percent of the time.
 - This response is designed to confine fires near the room of origin, to stop wildland fires to under 3 acres when noticed promptly, and to treat up to 5 medical patients at once.
 - This equates to 1-minute dispatch time, 1.5 minutes company turnout time and 8 minutes drive time spacing for multiple units in the most populated areas.
- PF-D.4.** Provide adequate fire station site area (typical site is approximately 0.75 acre) and allow room for station expansion with additional considerations:
- Consider the inclusion of fire station facilities in villages or development projects as an alternative method to the acreage guideline;
 - Where density and development constrain site size consider a multistory station;
 - Acquire adjacent sites that would allow for station expansion as opportunities allow; and
 - Gain greater utility of fire facilities by pursuing joint use opportunities such as community meeting rooms or collocating with police, libraries, or parks where appropriate.
- PF-D.6.** Provide public safety related facilities and services to assure that adequate levels of service are provided to existing and future development.
- PF-D.10.** Buffer or incorporate design elements to minimize impacts from fire stations to adjacent sensitive land uses, when feasible.

City of San Diego Municipal Code

The SDMC contains the fire hazard severity zone maps and identifies the fire protection Very High FHSZs and local agency Very High FHSZs for the city's area of responsibility. The adopted Fire Hazard Severity Zone Maps from CAL FIRE are maintained and codified in Sections 55.9401, 511.4904, and 145.0703(a)(2) of the SDMC.

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. Section 142.0412 (Land Development Code) 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.

Section 142.0412 includes the City's Brush Management Regulations which 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. Brush management is intended to reduce the risk of significant loss, injury, or death involving wildland fires. Unless otherwise approved by the City Deputy Fire Marshal, the brush management would consist of two separate and distinct zones, as follows:

- **Zone One:** 35-foot width; 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 unless the property received tentative map approval before November 15, 1989.
- **Zone Two:** 65-foot width; the area between Zone One and any area of native or naturalized vegetation. This zone would consist of thinned native or naturalized vegetation.

Section 142.0411 includes the City's Steep Hillside Guidelines. The Steep Hillside Guidelines are divided into four sections, each providing standards and guidelines intended to assist in the interpretation and implementation of the development regulations for steep hillsides contained in Chapter 14, Article 3, Division 1, Environmentally Sensitive Lands. Every proposed development that encroaches into steep hillsides is subject to the Environmentally Sensitive Lands Regulations and is be evaluated for conformance with the Steep Hillside Guidelines as part of the review process for

the required Neighborhood Development Permit, Site Development Permit or Coastal Development Permit (September 2024).

5.18.3 IMPACTS ANALYSIS

The City has not adopted Significance Determination Thresholds that address potential impacts due to wildfire. Therefore, for the purposes of this EIR guidance provided by checklist questions listed in Appendix G of the State CEQA Guidelines (Section IX. Hazards and Hazardous Materials and Section XX. Wildfire) are used to evaluate wildfire impacts below.

5.18.3.1 Issue 1: Impair an Emergency Response or Evacuation Plan

Issue 1: *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

Threshold

Consistent with State CEQA Guidelines Appendix G, a project would result in a significant impact if it would substantially impair an adopted emergency response plan or emergency evacuation plan.

Impact

As discussed in Section 5.18.2, Regulatory Framework, the city falls under the County's EOP (County of San Diego 2022), which 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. The City's Office of Emergency Services oversees the City's Emergency Prevention and Protection Program, Mitigation and Finance Program, Response and Recovery Program, and Regional Training Program. Through these programs, the Office of Emergency Services supports and coordinates numerous risk management planning efforts; trains City employees; assists with the integration of emergency plans; ensures information flow to the public to assist in their emergency preparation and response; interfaces with County of San Diego, state, and federal jurisdictions; maintains the City's two Emergency Operations Centers; and secures grants from state and federal agencies related to homeland security (City of San Diego Office of Emergency Services 2021).

The project involves construction and operation of a new fire station that would serve the surrounding community and does not involve the construction of new homes or the introduction of a new permanent population. Short-term construction activities may temporarily encroach into 47th Street but would not obstruct the flow of vehicles in the event of an emergency.

During operation, it is anticipated the fire station would be a first responder in the event of an emergency or evacuation and would serve the surrounding community. This fire station would also

increase the response capabilities of San Diego Fire-Rescue. The project would not add a significant number of vehicle trips to the local roadways. Fire apparatus and other emergency vehicles would operate and respond to fire and emergency calls, per the City's established protocol and procedures followed by emergency services. The project would also construct frontage improvements along 47th Street per City standards to ensure adequate access is provided for fire vehicles and other equipment.

Access to the project site would be provided via two driveways: one standard driveway off 47th Street to accommodate passenger vehicles, and one larger driveway connected to the apparatus bay, also off 47th Street, to accommodate fire apparatus and equipment. Both vehicle access points are located on the east side of the project site.

Additionally, the project is subject to review by the San Diego Fire-Rescue and is required to comply with state and local building codes to ensure compliance with applicable safety standards. Therefore, the project would not impair implementation of, or physically interfere with, an adopted City or County emergency response plan or emergency evacuation plan.

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

No mitigation would be required.

5.18.3.2 Issue 2: Expose People or Structures to Significant Wildfire Risk

Issue 2: *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

Threshold

Consistent with State CEQA Guidelines Appendix G, impacts related to wildfire hazards would be significant if a project would expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Impact

As shown in Figure 5.18-1, the project site, as well as lands to the north, south, west and east are not located within a High or Very High FHSZ within a State or Local Responsibility Area designated by CAL FIRE. The closest High FHSZ is located within an SRA over 5 miles away. However, the City has its own FHSZ maps separate from CAL FIRE. The project site is not designated as a Very High FHSZ

according to the City's maps; however, the areas immediately surrounding the project site are mapped as a Very High FHSZ, including Fairmount Avenue, 47th Street, and adjacent development. CAL FIRE's Fire Hazard Severity Zone Map is codified in the SDMC (City of San Diego 2024b). The project and identified project features have been designed in accordance with the SDMC and Landscape Regulations.

Construction

As indicated above, the project site is located adjacent to undeveloped areas to the north and northeast, west and south. Proposed construction activities would include the use of heavy equipment to clear and grade land in proximity to undeveloped areas. Excavation and grading would occur within areas that contain geomorphic rock and would have the potential to create sparks. Construction activities would introduce new ignition sources to the project area which could result in increased wildfire risk and expose nearby residential and commercial uses to risk of loss, injury or death involving wildland fires.

As required by a condition of approval, brush management on the project site and within Brush Management Zones shall be conducted prior to the start of construction and maintained throughout all phases of project construction. Brush management would create adequate firebreaks consisting of vegetation removal or thinning of dead and dry vegetation, as required by Section 142.0412 of the SDMC and SDFD requirements, that shall be created around all grading, staging areas, and other construction activities in areas where there is flammable, non-irrigated vegetation (removal of protected habitat and irrigated native species planted as part of the project would be exempt). Additionally, work areas shall be cleared and kept clear of all flammable vegetation, invasive plant species, debris or other potentially flammable materials, in accordance with SDMC Section 142.0412, Brush Management, and approved by SDFD. To reduce fire risk on the project site, temporary construction power lines would be allowed in areas that have been cleared of combustible vegetation, consistent with local fire agency and CPUC General Order 95.

Operations

During operation, the project would function as a fire station serving the surrounding community. Project operations would primarily include fire and emergency personnel attending to fires and other emergencies. The project includes a 1,000-gallon diesel fuel tank for fueling the onsite emergency generator and other onsite equipment.

The City requires brush management for premises with structures that are within 100 feet of any highly flammable area of native or naturalized vegetation. Naturalized vegetation exists in the areas to the north, northwest, west, and south of the project site. The project would implement the City's Brush Management Regulations found in Section 142.0412 of the SDMC, which establishes a means

of providing fire safety in the landscape. The project's Brush Management Plan is shown on Figure 3-6, Brush Management Plan in Chapter 3, Project Description.

As shown in Figure 3-6, the Brush Management Plan includes two distinct brush management areas referred to as "Zone One" and "Zone Two" designed to reduce fire hazards around structures by providing an effective fire break between all structures and contiguous areas of native or naturalized vegetation. Brush Management Zone (BMZ) One is the area adjacent to the structure and would be the least flammable. It would consist of pavement and permanently irrigated landscaping that would extend 35 feet beyond the fire station building except on the west and south sides of the building, where it would extend between 10 and 15 feet beyond the building up to the proposed approximately six (6)-foot tall retaining fire wall (which would act as an alternative construction measure to compensate for the reduced Zone 1 Defensible Space). BMZ Zone 2 Brush Management thinning area varying in width between approximately 53 and 90 feet is proposed in the northwestern and western perimeter of the project site. All BMZ vegetation management and compliance shall occur as needed for fire safety and as determined by the SDFD (see Appendix K).

As discussed above, post-development BMZs in conjunction with proper long-term maintenance would reduce the likelihood that a fire would start on the project site and spread to offsite fuels. Additionally, BMZs and project development would provide the existing adjacent residential structures and proposed fire station with structural defense, through fuel modification and equivalent protections to survive a vegetation fire on or approaching the project site.

As presented in the FFLMR (Appendix K), the BMZs provided for the project are not standard BMZs. Rather, the BMZs provided include Zone 1 areas that vary from 10 to 43 feet in width and Zone 2 areas comprising the remaining distance to provide a 100-foot-wide BMZ for most areas. However, a small area within the northwestern portion of the project site would be just under the 100 feet required width but is considered to meet the intent of the City's standard, since BMZs ranging between 53 and 90 feet in width are suitable for the type of fire anticipated from off-site fuel sources. Additionally, it may not be feasible to perform brush management on the southern side of the project site, as it potentially may encroach into sensitive coastal sage scrub habitat to the south or into the MHPA. This is a decision that would need to be made by the City. It is anticipated that the proposed fire station would be able to withstand a short duration, low to moderate intensity fire and ember shower that is projected from off-site, adjacent fuels based on several factors, as discussed below.

The proposed combination of BMZs and alternative compliance measures would reduce wildfire risk during construction and operation of the project by providing protection to on-site structures and adjacent properties from an advancing wildfire. The City's Landscape and Fire Review staff have reviewed the project's Brush Management Plan and concluded that it adequately addresses the fire safety potentially affecting the project site. As required by a condition of approval, the City's Landscape and Fire staff would review the proposed landscaping plant materials to ensure no highly

flammable plant materials are used in the proposed landscaping prior to the issuance of building permits. Compliance with local and state requirements (e.g., SDMC, California Fire Code, California Building Code) would ensure the project would not expose people or structures to significant risk of loss, injury, or death involving wildland fires.

Significance of Impact

The project would comply with applicable state and City standards associated with fire hazards and prevention, including alternative compliance measures. The project would also implement pre-construction brush management as well as avoid the use of highly flammable species within the project's landscaping. Overall, the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires and impacts would be **less than significant**.

Mitigation

No mitigation would be required.

5.18.3.3 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 concentration from wildfire or the uncontrolled spread of a wildfire?*

Threshold

Consistent with State CEQA Guidelines Appendix G, a project would result in a significant impact to wildfire if due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from wildfire or the uncontrolled spread of a wildfire.

Impact

As shown in Figure 5.18-1, the project site, as well as lands to the north, south, west and east are not located within a High or Very High FHSZ within a State or Local Responsibility Area as designated by CAL FIRE, with the closest High Fire Hazard in the SRA area being over 5 miles southeast. However, the City has its own FHSZ maps separate from CAL FIRE, which show the project site as outside of a Very High Fire Hazard Severity Zone, but the areas immediately surrounding the project site to be in a Very High Fire Hazard Severity Zone, including Fairmount Avenue, 47th Street, and adjacent development.

Slopes

The project site generally slopes downward towards the north and west. Site elevations range from 194 feet amsl in the southeast to 140 feet amsl in the northwest (Appendix F.2). Over 40% of the site has a slope gradient that exceeds 25%. Approximately 0.45 acres (34.7% of the total project site) of the 0.59-acre project footprint would be graded to accommodate the proposed development. The 0.59-acre project footprint consists of 0.33-acre of steep slopes. To minimize site grading and to incorporate the existing site topography, a portion of the building would be constructed using the existing hillside (see Figure 3-2, Project Rendering in Chapter 3, Project Description).

Graded slopes would be revegetated in compliance with Section 142.0411 of the SDMC, Section III of the Steep Hillside Guidelines in the Land Development Manual, and other applicable City requirements. The project would not create new slopes such that slopes would alter wind patterns, influence fire behavior, or exacerbate wildfire risks.

Prevailing Winds

The prevailing wind pattern in the project area is from the west (on-shore), but the presence of the Pacific Ocean causes a diurnal wind pattern known as the land/sea breeze system. However, the highest wind velocities associated with hazardous wildfire conditions are associated with downslope, canyon, and Santa Ana winds. The project area, like much of Southern California, may be subject to extreme fire weather, such as Santa Ana winds. However, as previously discussed, the project would not alter slopes such that localized wind patterns would be altered thereby exacerbating wildfire risks.

Other Factors

Other factors that contribute to the wildfire environment on and surrounding the project site include vegetation and structures.

Vegetation

As discussed, naturalized vegetation that presents a potential wildfire hazard is adjacent to the project site to the north, west, and south; 47th Street is located immediately to the east and separates the project site from naturalized vegetation and residential development farther to the east.

As previously discussed, the project would implement BMZs and a 6-foot fire wall would be constructed around the perimeter of the development footprint, in compliance with SDFD requirements and the SDMC. These measures would reduce wildfire risk to the project site, as well as reduce the likelihood of a wildfire spreading from the project site to offsite fuels.

Building Materials

The project would involve development of a fire station that would contribute to the City's fire and emergency response capabilities. The proposed building includes a concrete and steel structural design with a series of free standing and building integrated retaining walls with several terraces. The building architectural style would be modern, with concrete, metal panels, composite panels, and curtain wall glass. The primary terrace would overhang the two proposed apparatus bays. The proposed fire station would include highly resistant building materials and construction methods that would meet the California Essential Services Buildings Standards, which are at least as ignition resistant as Chapter 7A of the San Diego Building Code. The following project features are required for new development in WUI areas and form the basis of the system of protection necessary to minimize structural ignitions as well as providing adequate emergency access:

- Application of the CBC, Chapter 7A ignition resistant building requirements.
- Minimum 1-hour rated exterior walls and doors.
- Multi- panel glazing with a minimum of one tempered pane, fire-resistance rating of not less than 20 minutes when tested according to NFPA 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).
- Automatic, interior fire sprinkler system to code for occupancy type.

The project site would be graded and would not result in over steepened slopes that could influence localized wind patterns or exacerbate wildfire risks, and includes BMZs and a fire wall, and would be constructed of highly ignition resistant materials, in accordance with state and local regulations. As such, it is not expected that the project would exacerbate wildfire risks due to slope, prevailing winds, or other factors, and expose project occupants to the uncontrolled spread of a wildfire or pollutants from a wildfire. Further, if a fire were to occur in the open space near the project site, once operational, fire responders from the new fire station would be first to respond.

Significance of Impact

The project would not exacerbate wildfire risks, due to slope, prevailing winds, or other factors, thereby exposing fire station employees to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be **less than significant**.

Mitigation

No mitigation would be required.

5.18.3.4 Issue 4: Infrastructure Maintenance Installation Exacerbation Resulting in Fire Risk

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?*

Threshold

Consistent with State CEQA Guidelines Appendix G, a project would result in a significant impact 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

The project includes the construction of a new fire station, as well as installation and maintenance of associated infrastructure. The project site is not designated as a Very High FHSZ by CAL FIRE (CAL FIRE 2024) but is located in an area that is adjacent to open space and naturalized vegetation. Further, the City's Very High FHSZ map designates areas adjacent to the project site as VHFHSZ (City of San Diego 2024c). Therefore, the installation and maintenance of associated infrastructure could introduce new ignition sources into a fire hazard area and exacerbate wildfire risk. Additionally, such activities would include trenching, grading, and other ground disturbing activities that could result in temporary or ongoing impacts to the environment.

The project proposes construction of a new 22,443 square-foot four-story fire station along with a parking lot, trash enclosure, an emergency generator, retaining walls, and a 1,000-gallon diesel fuel tank. Associated infrastructure for the project would include connection to existing utilities, road improvements, and installation of BMZs.

Utilities

The project would connect to existing utilities in 47th Street and would install a new electrical power pole along 47th Street. 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 project. The project includes an emergency generator along with a generator enclosure to reduce sound. The emergency generator would be located just northeast of the fire station along with a 1,000-gallon fuel tank. The project would tie into the existing water and wastewater utilities located in 47th Street. The connection to existing utilities would be underground with the exception of a new power pole to be installed on 47th Street.

Utility connections would be required to comply with the current 2022 California Code of Regulations, Title 24 Parts 1-12, as well as City regulations which would require review and approval through the building permit process. Additionally, the project would include vegetation management prior to construction, as described above in Section 5.18.3.2. All construction activities would be conducted in accordance with state and local guidelines related to fire prevention and safety.

Roads

The project does not propose new roads but would include offsite improvements within the 47th Street right-of-way. A new 22-foot-wide driveway apron at the project entrance to visitor and employee parking and a new 40-foot-wide driveway apron at the entrance to the apparatus bays would be constructed. In addition, the project would construct a new crosswalk and concrete curb cut on 47th Street. All improvements would occur the 47th Street right-of-way (0.08-acre). A temporary construction staging area for construction equipment and materials would be located approximately 0.40-mile southwest of the project site (see Figure 3-7, Off-site Construction Staging). The construction of required driveways and the temporary use of an offsite construction staging area would not exacerbate fire risk in the area.

BMZs

Although the project does not propose installation of fuel breaks, the project would include up to 100-feet of BMZs between the surrounding natural open space areas and the project development footprint. The project's landscape plan is illustrated in Figure 3-5, Landscape Plan and the project's brush management plan is shown on Figure 3-6, Brush Management Plan. The proposed landscape plan would include drought-tolerant native vegetation and low water use plants. A detailed in the landscape plan, BMZs, and plant palette would be submitted to the SDFD for review and approval prior to the issuance of building permits. As required through conditions of approval, no highly flammable plant species shall be allowed within the project's landscaping plan. The project would implement the City's Brush Management Regulations found in Section 142.0412 of the Land Development Code, which establishes a means of providing fire safety in the landscape.

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. Therefore, 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 consistent with the SDMC BMZ requirements.

The installation and maintenance of associated infrastructure is not expected to exacerbate wildfire risk. All fire safety regulations would be implemented, and vegetation clearance would occur prior to the start of construction. Any potential temporary or ongoing environmental impacts related to these components of the 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. No adverse physical effects beyond those already disclosed in this EIR would occur as a result of installation or maintenance of the project's associated infrastructure.

Significance of Impact

Therefore, the installation and maintenance of associated infrastructure would not exacerbate wildfire risk or result in temporary or ongoing impacts to the environment beyond those disclosed within this EIR, and impacts would be **less than significant**.

Mitigation

No mitigation would be required.

5.18.3.5 Issue 5: Expose to Flooding or Landslides due to Post-fire Conditions

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?*

Threshold

Consistent with State CEQA Guidelines Appendix G, a project would result in a significant impact 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

As discussed in Section 5.6, Geologic Conditions, there are no confirmed, known, or highly suspected landslides mapped on the project site or vicinity. The site generally slopes downward towards the north and west. Site elevations range from 194 feet amsl in the southeast to 140 feet amsl in the northwest (Appendix F.2). Additionally, the site is mapped by the City as being in an area that is considered to be either level or sloping terrain with favorable geologic structure such that the landslide hazard is considered low even though the topography includes slopes that are greater than 25% (Geologic Hazard Category 52) (Appendix E.1). Compliance with the City's building and land development code requirements for any existing or manufactured slopes would minimize potential slope instability. In addition, the underlying geologic conditions consist of metamorphic rock that is not prone to landslides or other slope instability issues.

According to the Preliminary Drainage Study prepared for the project (Appendix F.2), the project site consists of undeveloped land covered in vegetation where the existing drainage occurs as sheet flow in a northerly to northwesterly direction over the moderate to steeply sloping natural hillside.

Construction of the project would result in an unretained increase in peak runoff rates for all basins, if not properly addressed by a detention/retention system. However, the project proposes Low Impact Development features that include an on-site detention system to provide management of stormwater associated with development to ensure peak runoff rates do not exceed existing conditions (Appendix F.2). As discussed in Section 5.17, Water Quality, development of the site would result in an overall increase in impervious area and site runoff, but peak stormwater flows after onsite detention would be at or below the existing condition peak flows at the project outfall.

In addition, based on the history of wildfires in the area no fires have recently occurred on the project site or in the vicinity, as discussed under section 5.18.1 above. Wildfires may result in soil conditions that repel water and do not allow water to percolate into the soil (hydrophobicity) due to the burning of the accumulated organic matter in soil. This water repellency may increase risk of mudflows and landslides (Movasat and Tomac 2020). However, because no wildfires have recently occurred on or adjacent to the project, conditions associated with post-fire slope instability do not currently exist. In the event that a fire was to occur on the slopes adjacent the project site, there are no people or structures downslope of these areas.

Due to the proposed development of the site, lack of evidence of previous landslides or fire history, and improved runoff conditions, 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

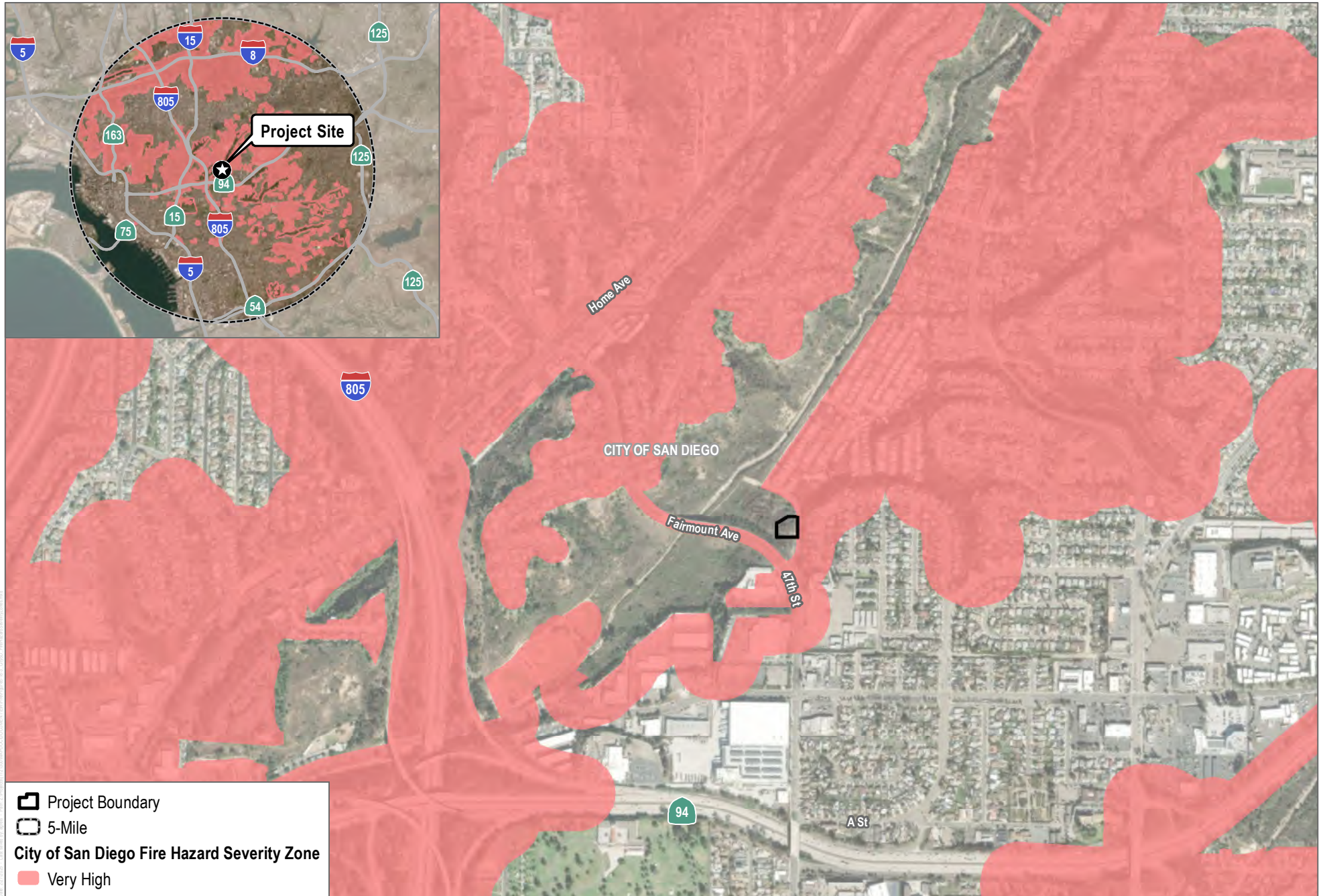
The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be **less than significant**.

Mitigation

No mitigation would be required.

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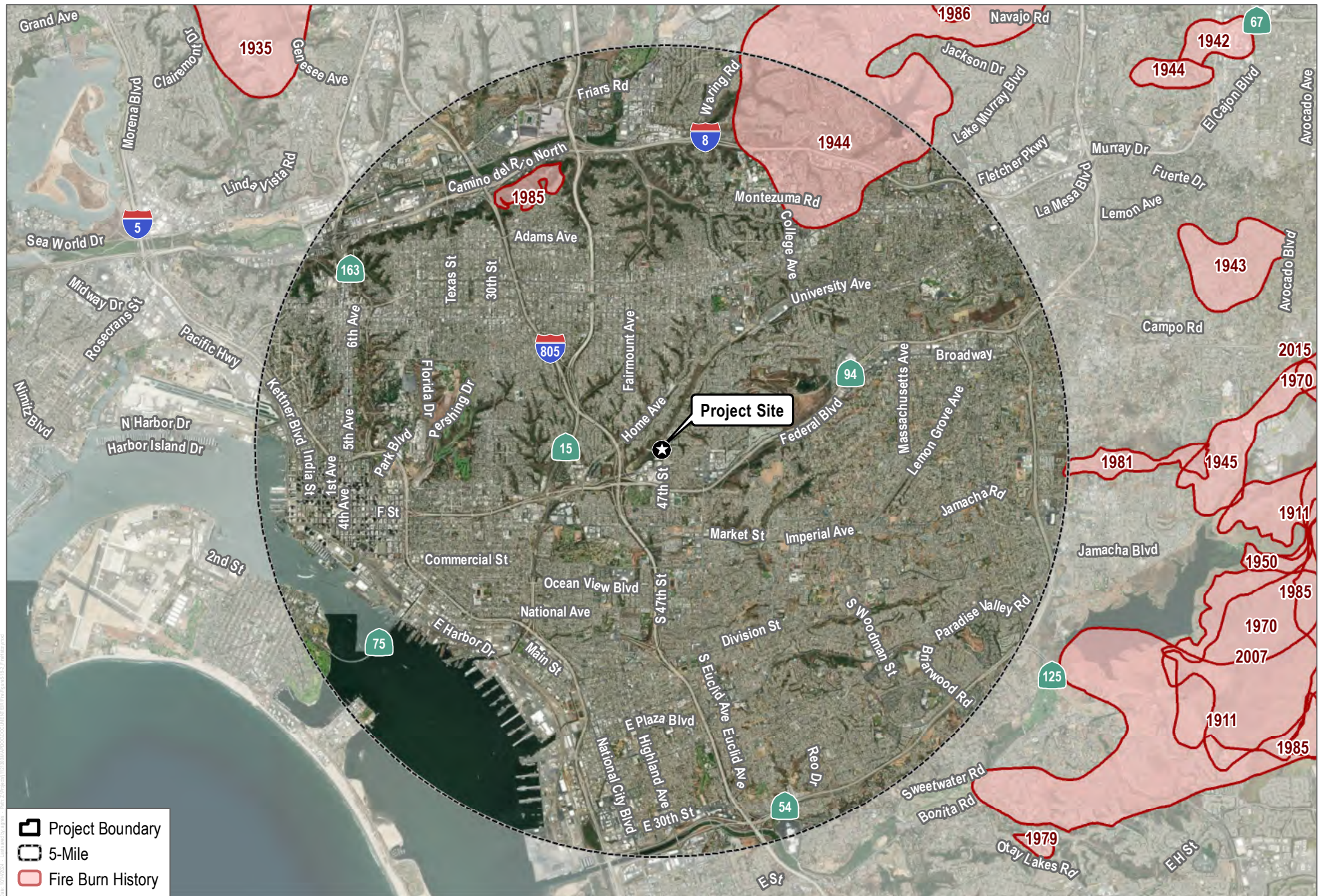
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SOURCE: SANGIS 2023; Open Street Map; ESRI World Imagery

FIGURE 5.18-2
City of San Diego Fire Hazards Severity Zones
Fairmount Avenue Fire Station

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SOURCE: CALFIRE; SANGIS 2023; Open Street Map; ESRI World Imagery

DUDEK



0 1.25 2.5 Miles

FIGURE 5.18-3

Fire History

Fairmount Avenue Fire Station

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CHAPTER 6 CUMULATIVE EFFECTS

CEQA Guidelines Section 15130(a) requires that an EIR discuss 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."

The basis and geographic area for analyzing cumulative impacts depend on the nature of the issue and the project. In some cases, regional planning addresses cumulative impacts, while in other cases, the analysis considers more localized effects. For the Fairmount Avenue Fire Station Project (project), a planned approach is taken.

6.1 CUMULATIVE EFFECTS ANALYSIS

6.1.1 LAND USE

The geographic scope for land use cumulative impacts is buildout of the City based on the City's General Plan (amended in 2024). As discussed in Section 5.1, Land Use, although implementation of the project would deviate from the RS-1-7 zoning related to building height and retaining wall height, the project would not be required to request a deviation from the City's Municipal Code because the City exempts all public services, such as a fire station, from complying with zoning regulations. The project would not divide an established community as the project site does not serve to connect two areas. Further, Section 5.1 reviews applicable goals and policies to ensure the project would not conflict with any applicable goals, policies, guidelines, or recommendations contained within the City's General Plan and the MCCP adopted for the purpose of avoiding or mitigating an environmental effect.

The project would be consistent with the City's CAP, as discussed in Section 5.7, Greenhouse Gas Emissions. Further, the project would be consistent with the General Plan's Conservation Element, as the project would include sustainability features and would not conflict with the applicable

strategies of the City's CAP per General Plan Policy CE-A.5. The project would be consistent with the General Plan's Noise Element as the project would not result in any substantial noise impacts and would comply with applicable existing local and state noise regulations per General Plan Policy NE-A.1. The project would be consistent with the General Plan's Historic Preservation Element with implementation of **MM-HIST-1**, which requires an Archaeological and Native American monitoring program, consistent with General Plan Policy HP-A.4. Although the project is located within the Airport Influence Area for the San Diego International Airport – Review Area 2 of the ALUCP, the project would not conflict with the San Diego International Airport's ALUCP. Lastly, the project would not result in a conflict with the provisions of the City's MSCP Subarea Plan or other approved local, regional, or state habitat conservation plan with implementation of **AM-BIO-1a**, **AM-BIO-1c**, **AM-BIO-2**, and **MM-BIO-3**.

The City's General Plan¹ Program EIR (General Plan PEIR) indicates that based on the compatibility of the Blueprint SD policy framework and other applicable land use plans and regulations, cumulative land use compatibility impacts would be less than significant (City of San Diego 2024). As the project would result in less-than-significant impacts to land use with implementation of the mitigation measures discussed above, the project's cumulative impacts to land use would **not be cumulatively considerable**.

6.1.2 TRANSPORTATION

As discussed in Section 5.2, Transportation, the project would not substantially alter the present roadway, pedestrian, bicycle, or transit circulation movements in the area. Additionally, the project would not conflict with adopted policies, plans or programs addressing the City's transportation system, and would not result in inadequate emergency access or create hazardous design features. The City's General Plan PEIR indicates that cumulative impacts related to consistency with transportation policies, emergency access, and hazardous design features would be less than significant (City of San Diego 2024). As such, the project would not result in a cumulatively considerable contribution to inadequate emergency access; conflicts with policies, plans or programs addressing the circulation system, including transit, bicycle and pedestrian access; or increase hazards due to design features.

The VMT analysis provided in Section 5.2, Transportation, is by nature a cumulative issue. Per screening criteria included in the City's TSM, a local serving public facility (such as transit centers, public schools, libraries, post offices, park-and-ride lots, police and fire facilities, and government offices) are presumed to have a less-than-significant VMT impact. The project is a fire station and is considered a local serving public facility/service. Therefore, the project's VMT impacts would be less than significant. LCI's Technical Advisory provides guidance to practitioners regarding VMT analysis

¹ Blueprint SD Initiative, adopted in 2024 also includes the Hillcrest Focused Plan Amendment and University Community Plan Update.

under cumulative conditions. A finding of less-than-significant project impact would imply a less than significant cumulative impact. Therefore, impacts from transportation would **not be cumulatively considerable**.

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 (SDAPCD) 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 O₃ and a state nonattainment area for O₃, PM₁₀, and PM_{2.5}. 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., VOCs and NO_x for O₃) 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 (CAAQS) and National Ambient Air Quality Standards (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, in Section 5.3, Air Quality, the project would not exceed any criteria air pollutant during construction. Therefore, the project would have a less than significant cumulative impact during construction. Additionally, as shown in Table 5.3-6, the project would not exceed any criteria air pollutant during 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 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 state implementation plans (SIP) and RAQS serve as the primary air quality planning documents for the state and SDAB, respectively. The SIP and RAQS rely on SANDAG's growth projections based on population, vehicle trends, and land use plans developed by the cities and the County included in 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 discussed in Section 5.3, Air Quality, the project would not result in significant regional growth that is not accounted for within the RAQS. As a result, the 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

The geographic context for the analysis of cumulative biological impacts is the City. As discussed in Section 5.4, Biological Resources, the project would result in potentially direct impacts to sensitive vegetation communities and special-status wildlife and potentially indirect impacts to vegetation communities, special-status plants, and special-status wildlife (**Impact Issues 1 and 2**). The project would implement **MM-BIO-1** for direct impacts to sensitive vegetation communities, including Tier III mixed chaparral and Tier II coastal sage scrub, and special-status wildlife such as coastal California gnatcatcher, Cooper's hawk, and wrentit. Implementation of **MM-BIO-1** includes a payment to the City's Habitat Acquisition Fund or deduction of credits from the Marron Valley Cornerstone Land Bank, which occurs inside the MHPA. Payment would be provided for the loss of 0.495 acres of coastal sage scrub (including disturbed) and 0.006-acre of mixed chaparral (which totals more than the 0.1 acres threshold of significance listed in the City's Biology Guidelines) to achieve the required mitigation ratios. The project would implement **AM-BIO-3**, which would revegetate the temporary disturbance of 0.039 acres of Diegan coastal sage scrub within the off-site construction staging area, for direct impacts to sensitive vegetation communities. Additionally, the project would implement **MM-BIO-2** for direct impacts to special-status wildlife, which requires pre-construction surveys to identify the presence of Crotch's bumble bee and/or nest colonies and other requirements if Crotch's bumble bee is present at the project site. Implementation of **MM-BIO-1**, **MM-BIO-2**, and **AM-BIO-3** would reduce direct impacts to sensitive vegetation communities and special-status wildlife to less than significant. The proposed project would result in no direct impact to special-status plant species.

As discussed in Section 5.4, Biological Resources, short-term indirect impacts to sensitive vegetation communities and special-status plants would be reduced to less than significant through compliance with the LUAG and the implementation of the City's avoidance measures **AM-BIO-1a** through **AM-**

BIO-1c and standard construction stormwater pollution prevention requirements. Implementation of **AM-BIO-1a** through **AM-BIO-1c** include standard permit measures that would be taken prior to construction, during construction, and post-construction to protect vegetation communities and special-status plants and wildlife. Indirect impacts to most special-status wildlife species would be reduced to less than significant through compliance with standard permit conditions, as described in **AM-BIO-1a** through **AM-BIO-1c**, **AM-BIO-2**, and **MM-BIO-3**. **AM-BIO-2** would implement LUAG compliance measures specific to the Coastal California gnatcatcher. Lastly, **MM-BIO-3** would require that MHPA boundaries and the requirements regarding the least Bell's vireo and southwestern flycatcher are shown on the construction plans prior to the issuance of a grading permit.

The project proposes no direct impacts to jurisdictional resources and wetlands regulated by the U.S. Army Corp of Engineers (ACOE), Regional Water Quality Control Board (RWQCB), California Department of Fish and Wildlife (CDFW), or the City. The project would result in indirect impacts to adjacent jurisdictional resources that would be reduced to less than significant through implementation of standard avoidance and resource protection measures (**AM-BIO-1a** through **AM-BIO-1c**) and standard construction stormwater pollution prevention requirements (**Impact Issue 3**). The project would result in no direct impacts to wildlife movement, corridors, habitat linkages, or nursery sites. The project would result in less-than-significant indirect impacts to wildlife corridors or habitat linkages through compliance with the MSCP LUAG (**Impact Issue 4**). The project would not conflict with the provisions of the MSCP (**Impact Issue 5**) with implementation of **AM-BIO-1a**, **AM-BIO-1c**, **AM-BIO-2**, and **MM-BIO-3**. The project occurs adjacent to the MHPA and is therefore required to document compliance with the MSCP LUAG to mitigate for potential adverse edge effects that would otherwise result in a potentially significant impact (**Impact Issue 6**). The project would be consistent with the City's ESL Regulations and Biology Guidelines (**Impact Issue 7**). No impact would occur related to the introduction of invasive plant species to natural open space area (**Impact Issue 8**).

Based on the City's adopted CEQA Thresholds, cumulative impacts are determined using the following threshold: The MSCP was designed to compensate for the regional loss of biological resources throughout the region. Projects that conform with the MSCP as specified by the Subarea Plan, and implementing ordinances, (i.e., Biology Guidelines and ESL Regulations) are not expected to result in a significant cumulative impact for those biological resources adequately covered by the MSCP. These resources include the vegetation communities identified as Tier I through IV (see Biology Guidelines, and the MSCP covered species list (see Appendix A of the City of San Diego's MSCP Subarea Plan) (City of San Diego 2022).

As discussed above, the project would conform with the MSCP with implementation of **AM-BIO-1a**, **AM-BIO-1c**, **AM-BIO-2**, and **MM-BIO-3**. As the project would conform with the MSCP, the project's contribution to cumulative biological resources impacts would **not be cumulatively considerable**.

6.1.5 ENERGY

The geographic scope for the analysis of cumulative energy impacts consists of the city, as well as all other surrounding areas within San Diego Gas & Electric's (SDG&E) service area.

As discussed in Section 5.5, Energy, the project would result in an increased demand for electricity, natural gas, and petroleum. However, the increased demand would not result in wasteful, inefficient, or unnecessary consumption of energy resources, either during project construction or operation. Further, in accordance with California Green Building Standards Title 24, Part 11, mandatory compliance, the project would have (a) 50% of its construction and demolition waste diverted from landfills; (b) mandatory inspections of energy systems to ensure optimal working efficiency; (c) low pollutant-emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring, and particle boards; and (d) a 20% reduction in indoor water use. Compliance with these mandatory measures would decrease the consumption of electricity, natural gas, and petroleum. In addition, the 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.

As discussed in the General Plan PEIR, future development in the city could contribute to cumulative impacts related to energy. However, all future development would be subject to existing state building and energy code regulations in place at the time of development and would not contribute to a cumulative impact related to energy and cumulative impacts would be less than significant (City of San Diego 2024). As such, the project's contribution to cumulative energy impacts would **not be cumulatively considerable**.

6.1.6 GEOLOGIC CONDITIONS

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

As discussed in Section 5.6, 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. Site-specific geologic impacts would be avoided or reduced below a level of significance through adherence to the recommendations in the project's geotechnical study, and through compliance with the California Building Code and City requirements. With the exception of erosion, because erosion created by the project could combine with other cumulative projects contributing to cumulative erosion impacts. As discussed in Section 5.2, the project would not create or contribute significantly to erosion; therefore, it would not combine with other cumulative projects potentially contributing to an increase in loss of topsoil and sedimentation in nearby waterways. The project and other cumulative development would be required to adhere to applicable federal, state, and local regulatory standards related to erosion and sedimentation, including applicable NPDES and related City regulations and would be required to implement BMPs and prepare a SWPPP pursuant to the City's Storm Water Standards and Grading Ordinance. Compliance with mandatory regulatory requirements would ensure that the project, and cumulative development under the City's General Plan, would not have a significant cumulative impact related to erosion.

As discussed in the General Plan PEIR, as each individual development with the potential for geologic hazards would be required to prepare a site-specific geotechnical study and comply with the remedial measures identified in the study, cumulative impacts related to geologic hazards would be avoided and would be less than significant (City of San Diego 2024). As such, the project's contribution to cumulative geologic conditions impacts 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 and the project's contribution to global climate change would not be cumulatively considerable.

As discussed in Section 5.7, projects that are consistent with the City's CAP would result in a less-than-significant cumulative impact regarding 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 the CAP Consistency Regulations, to the extent feasible. Cumulative GHG impacts would be significant for any project that is not consistent with the CAP.

Per Section 5.7, pursuant to the City's Memorandum, Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects, the environmental analysis should include a discussion of the project's potential to conflict with each of the six

strategies of the CAP. The project would be consistent with and would not conflict with the six applicable strategies of the City's CAP, as described in Section 5.7. Therefore, the anticipated project-generated GHG emissions would not directly or indirectly conflict with the City's CAP, and GHG emissions impacts would be less than significant. Therefore, impacts from GHG emissions would **not be cumulatively considerable**.

6.1.8 HEALTH AND SAFETY

The geographic context to evaluate cumulative health and safety impacts would include the city and future buildout of the city. The cumulative context for the use, handling, storage, and transport of hazardous materials is the city limits, during project construction and for the duration of project operation. Adverse effects of hazards and hazardous materials tend to be localized and not cumulative by nature, as impacts generally vary by land use and site characteristics. Therefore, the areas closest to the project site would be most affected by project activities.

As discussed in Section 5.8, Health and Safety, the project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and a significant hazard to the public or environment would not result. Any hazardous materials used during construction of the project, or during operation, would be transported, stored, 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. The project 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. The project would not result in airport safety hazards for people residing or working in the project area, as project would be consistent with the San Diego International Airport ALUCP, and the project would not result in a safety hazard for people residing or working within an airport influence area.

The City's General Plan PEIR concluded that potential hazards associated with hazardous sites, hazardous material, and hazards near a school are site-specific and would not combine with hazards in other communities within the vicinity of the project area to create a cumulative impact. Therefore, implementation of the General Plan would not result in a cumulatively significant impact related to hazards sites, hazardous materials, or hazards near a school and would not cause a cumulative significant impact related to impairing implementation of, or physically interfering with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant (City of San Diego 2024).

Health and safety impacts are generally site specific and thus handled on a site-by-site basis. Cumulative projects 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. Therefore, project's contribution to a cumulative health and safety t impact would **not be cumulatively considerable**.

6.1.9 HYDROLOGY

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

As discussed in Section 5.9, Hydrology, development of the project would result in an increase of impervious surfaces in the area. This would potentially result in increased surface runoff, alteration of the regional drainage pattern, flooding, and reduction in onsite groundwater recharge. However, the project would be required to include drainage control improvements that retain/detain peak stormwater flows onsite. The project would not impose flood hazards on other properties or be developed within a 100-year floodplain. Further, implementation of the project would require conformance with federal, state, and local regulations related to hydrology and drainage.

Cumulative development under buildout of the General Plan would also be required to comply with regulatory requirements related to hydrology and drainage and would be required to prepare hydrologic and hydraulic calculations, subject to review and approval by the City, to demonstrate compliance with requirements. The City's General Plan PEIR indicates that cumulative downstream flooding impacts would be avoided through compliance with all NPDES permit requirements, the City's Stormwater Standards Manual and Drainage Design Manual, and other City regulations, which all future development in the City would be required to comply with. While development downstream of the Provisionally Accredited Levee (PAL) in Mission Valley would be a significant impact, it is a localized impact and would not contribute to a cumulative flooding impact. Thus, cumulative impacts would be less than significant (City of San Diego 2024). As the project would be required to comply with regulatory requirements related to hydrology and drainage, the project's contribution to a cumulative hydrology impact would **not be cumulatively considerable**.

6.1.10 NOISE

The geographic scope for the analysis of cumulative traffic noise is the buildout of the General Plan area, and the anticipated increase in traffic volumes along local roadways. Non-transportation operational noise sources and construction noise impacts are typically project-specific and highly localized (i.e., these do not generally affect the community noise level at distances beyond several hundred feet). These noise sources do not significantly contribute to cumulative noise impacts at distant locations and are not evaluated on a cumulative level.

Construction activities associated with proposed or future development within the area would contribute to cumulative noise and vibration levels, but in a geographically limited and temporary manner. As other development occurs in the area, noise from different types of uses (e.g., traffic, aircraft, fixed noise sources) would continue to combine, albeit on a localized basis, to cause

increases in overall background noise conditions within the area. As a result, such sources do not significantly contribute to cumulative noise impacts at distant locations and are not evaluated on a cumulative level.

As discussed in Section 5.10, Noise, construction noise and operational noise, including on-site stationary noise and traffic noise, related to project activities would not result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of City standards. Therefore, the project's contribution to a cumulative noise impact would **not be cumulatively considerable**.

6.1.11 PALEONTOLOGICAL RESOURCES

The geographic scope for the analysis of cumulative paleontological impacts consists of development slated to occur within the City or San Diego County on San Diego Formation. As described in Section 5.11, Paleontological Resources, the project site is underlain by one formation with high-resource potential (San Diego Formation) and one formation with moderate-resource potential (very old paralic deposits) for the occurrence of sensitive paleontological resources. Given the underlying paleontologically sensitive deposits and depth of proposed construction-related excavation activities, the project site has the potential to yield scientifically significant paleontological resources. The project is subject to compliance with the City's grading ordinance (SDMC Section 142.0151) and the requirement for paleontological monitoring, which would be made a condition of project approval. Additionally, the project would be required to comply with the City's Paleontological Guidelines identified in Appendix P of the Land Development Manual. Paleontological monitoring conducted in accordance with the Municipal Code and Appendix P of the Land Development Manual would ensure no significant impact would occur.

The City's General Plan PEIR indicates that application of SDMC Section 142.0151, which requires paleontological monitoring in accordance with the General Grading Guidelines for Paleontological Resources in the Land Development Manual, would ensure cumulative impacts to paleontological resources are avoided and cumulative impacts related to paleontology would be less than significant. As the project would comply with SDMC Section 142.0151 and the requirement for paleontological monitoring, the project's cumulative impacts to paleontology would **not be cumulatively considerable**.

6.1.12 HISTORICAL RESOURCES

The geographic scope for historical resources cumulative impacts is the city. As discussed in Section 5.12, Historical Resources, the project APE is located within close proximity to Chollas Creek, which was used by local Native Americans as a valuable source of resources and as a travel route, as a known village is located outside the records search area along the creek. Due to the project's close

proximity to Chollas Creek, the potential exists for unknown buried archeological and Native American resources to occur.

The Cultural Resources Phase I Inventory Letter Report prepared for the project indicates there is a low-to-moderate sensitivity for identifying intact subsurface archaeological deposits during construction of the project within areas that have not been previously disturbed. However, due to the low-to-moderate sensitivity for identifying intact subsurface archaeological deposits within areas that have not been previously disturbed, ground disturbance associated with project construction has the potential to uncover previously unknown archaeological and Native American resources, which could result in a potentially significant cumulative impact to which the project would make a cumulatively significant incremental contribution (**Impact Issue 1**). With implementation of **MM-HIST-1**, which requires a monitoring program to protect unknown archaeological or Native American resources and Native American monitor on-site during construction activities, and outlines procedures in the event that archaeological resources are exposed during construction, potential impacts to historical resources would be reduced to below a level of significance. No existing formal cemeteries or known burials are identified within the project APE (**Impact Issue 3**). However, in the event of an unanticipated discovery of human remains, the project would proceed in accordance with local and state regulations and implement **MM-HIST-1**, which would reduce impacts to human remains to a less-than-significant level. No existing religious or sacred uses are located on the project site and impacts to human remains would be less than significant.

The City's General Plan PEIR indicates that characteristic of the project areas would limit the potential for significant, previously undiscovered resources to be encountered, but does not eliminate the possibility for further impacts. While individual projects can avoid or mitigate the direct loss of a specific resource, the effects would be cumulatively considerable, and therefore would result in a cumulatively significant impact to historic structures, objects, or sites and archaeological resources. The General Plan PEIR indicates that adherence to local, state, and federal regulations regarding the treatment of human remains would ensure that potential cumulative impacts to human remains would be less than significant (City of San Diego 2024).

As the project would result in less-than-significant impacts to historical resources with mitigation incorporated, the project's contribution to the significant historical resources cumulative impact identified in the City's General Plan PEIR would **not be cumulatively considerable**.

6.1.13 PUBLIC SERVICES AND FACILITIES

The geographic scope for the cumulative analysis for the provision of fire and police protection, parks and recreations, libraries, and other public services is the city limits which corresponds to the various provider district boundaries. The geographic scope for schools would be the San Diego Unified School District (SDUSD) boundary.

As discussed in Section 5.13, Public Services and Facilities, the project would include the construction of a fire station and would not introduce new dwelling units or increase the population base within the fire protection service area. The project would not generate additional demand for fire protection and emergency services within the specified service area beyond what is currently anticipated. The existing police facilities would continue to serve the project site, and the project would not result in the need for new or expanded police station facilities in order to maintain acceptable service ratios, response times, or other performance objectives. The project would not introduce a new population base that would require parks and other recreation facilities or contribute to an increase in demand for new educational facilities or the expansion of existing ones and library services. The project is not required to pay school impact fees because it is a public project.

As discussed in the General Plan PEIR, as development occurs in the city, new and/or improved public services facility projects would likely be required to serve the additional density and associated demand for public services. Future public services facilities projects would require a separate environmental review and compliance with regulations in existence at the time as well as any additional project-specific mitigation measures would reduce potential environmental impacts related to the construction and operation of these public facilities. Nevertheless, project-specific impacts as well as the extent of these impacts cannot be determined at this time; thus, cumulative impacts related to public services and facilities would be significant (City of San Diego 2024).

As the project would result in less-than-significant impacts for public services, the project's contribution to the significant public services cumulative impact identified in the City's General Plan PEIR would **not be cumulatively considerable**.

6.1.14 PUBLIC UTILITIES

The geographic scope for public utilities cumulative impacts is the city and the specific area for each water, wastewater, and solid waste utility.

Water

Cumulative projects within the city would be serviced by the same water supply as the project and would contribute to the cumulative demand for water supply and water infrastructure. As concluded in the Sewer and Water Study (Appendix J.1) prepared for the project, the project would result in a peak domestic water demand of 69,275 gpd or 77.6 acre feet per year (AFY). The irrigation water demand for the project is estimated to be 108,000 gpd or 121 AFY based on the current landscape plan. The project's estimated maximum annual demand of 198.6 AFY 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. 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. Overall, 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 and provide water in structure improvements as they are needed. All projects would be required to construct water infrastructure improvements in order to adequately serve the projects as necessary. Thus, as 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. The project would connect to an existing water main located in 47th Street, and no additional improvements would be needed to serve the project. Cumulative impacts to water supply/service facilities would **not be cumulatively considerable**.

Wastewater

Project generated wastewater would account for 10,411 gpd and proposed flow added to the downstream sewer system by the wastewater generation would be 8.3% of the total flow (Appendix J.1). The project includes a new point of connection to the existing sewer line but would not result in any modifications to the existing sewer system in the project vicinity. The wastewater connections and the environmental impacts of those water connections are addressed within this EIR, including consideration of compatibility with adjacent land uses; effects on drainage, water quality, air quality, aesthetics, and biological resources; and the potential for the project to increase noise levels. 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 provide improvements to address infrastructure needs. 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 SF 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. As the project building is less than 40,000 SF, the preparation of a project-specific WMP is not required.

As stated in Section 5.14, Public Utilities, in accordance with state diversion targets, a minimum of 75% of construction materials would be recycled. Regarding operation, it is assumed the project's trash enclosure would provide an organic waste storage area and recyclable material storage area that

would accommodate trash and recycling facilities. Recycling services are required by SDMC Section 66.0707. Therefore, impacts associated with solid waste would **not be cumulatively considerable**.

As discussed in the City's General Plan PEIR, cumulative impacts associated with utilities, water supply, and solid waste would be less than significant. Despite planning level efforts to ensure adequate wastewater capacity, at this level of programmatic review and without the benefit of project-specific development plans, cumulative impacts associated with adequate wastewater capacity would be significant (City of San Diego 2024).

6.1.15 TRIBAL CULTURAL RESOURCES

The geographic scope for tribal cultural resources cumulative impacts is the city. As discussed in Section 5.15, Tribal Cultural Resources, the project site has not been selected as a site recommended for historic designation and is not identified on any of the historic resource lists/databases. Per the consultation efforts of the City with the San Pasqual Band of Diegueno Mission Indians, the project would require Native American monitoring. While no tribal cultural resources were identified within the project APE during the pedestrian survey, the project APE is located within close proximity to Chollas Creek, which was prehistorically used by local Native Americans as a valuable source of resources and as a travel route. As such, ground disturbing construction activities have the potential to impact unknown tribal cultural resources and Native American resources, which could result in a potentially significant cumulative impact to which the project would make a cumulatively significant incremental contribution (**Impact Issue 1**). However, with implementation of **MM-HIST-1** (see Section 6.1.12, Historical Resources), potential impacts to tribal cultural resources would be reduced to below a level of significance.

The City's General Plan PEIR indicates future development in accordance with the General Plan may contribute to incremental tribal cultural resource impacts. Adherence to the existing regulatory and policy framework and implementation of the mitigation framework would reduce impacts to Tribal Cultural Resources. However, as the degree of future impacts and the applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at the program level of analysis in the General Plan PEIR, the cumulative impact on Tribal Cultural Resources would be significant (City of San Diego 2024).

As the project would result in less-than-significant impacts to tribal cultural resources with implementation of **MM-HIST-1**, the project's contribution to the significant tribal cultural resources cumulative impact identified in the General Plan PEIR would **not be cumulatively considerable**.

6.1.16 VISUAL EFFECTS/NEIGHBORHOOD CHARACTER

The geographic scope of the cumulative impact analysis for visual effects/neighborhood character includes the area that comprises the viewshed in which the project site is visible, and the views

visible from the project site, which includes development in the immediately surrounding areas. As the project site is not considered a protected public view or scenic vista, this issue is not discussed as a cumulative impact.

As discussed in Section 5.16, Visual Effects/Neighborhood Character, implementation of the project would result in changes in the aesthetics of the site and its surroundings. However, through compliance with the City's design guidelines and development regulations for the RS-1-7 zone (except for height), construction of a four-story fire station would not be characterized as a negative aesthetic impact and would not result in bulk, scale, materials, or style which would be incompatible with surrounding development. The project would not result in a substantial change in the existing landform. The project would comply with the lighting requirements of the SDMC and lighting fixtures would be fully shielded and directed downward. Furthermore, a 6-foot-tall fire wall along the southern project boundary would provide additional shielding of any light from the development. The cumulative projects located closest to the project site would also be required to comply with the same development standards as the project, pursuant to the City's design guidelines, development regulations for the RS-1-7 zone, and the SDMC for lighting regulations.

As discussed in the General Plan PEIR, future development associated with the General Plan would contribute to a significant cumulative impact to aesthetics², specifically related to scenic views and vistas, scenic viewsheds in proximity to scenic highways, the visual environment, and shade. Projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which could identify additional project features and/or mitigation measures to address potential impacts to the visual environment. Additionally, compliance with the regulations in existence at the time the development is proposed, including the City's base zone regulations and other City regulations, would help reduce potential environmental impacts. However, due to the potential for deviations from the SDMC to be allowed, it cannot be ensured that all applicable City land development and design regulations would apply. Therefore, the General Plan PEIR indicated at the programmatic level of analysis, cumulative impacts related to scenic views and vistas, scenic viewsheds in proximity to scenic highways, the visual environment, and shade would be significant. Future development would be required to comply with the City's Off-Site Development Impact Regulations addressing light and glare, and cumulative light and glare impacts would be less than significant (City of San Diego 2024).

As the project would result in less-than-significant impacts for visual character/neighborhood effects and would comply with SDMC design guidelines and lighting regulations, the project's contribution to the significant aesthetics cumulative impacts identified in the City's General Plan PEIR would **not be cumulatively considerable**.

² The General Plan PEIR address changes to visual effects/neighborhood character in Section 4.1, Aesthetics.

6.1.17 WATER QUALITY

The geographic scope for hydrology cumulative impacts is the Chollas Creek watershed. Development of the project and the construction of cumulative development under the General Plan would have the potential to contribute to water quality impacts, including erosion and siltation, in the Chollas Creek watershed. The City 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's stormwater standards is thus considered adequate to preclude surface water quality impacts, unless substantial evidence supports a fair argument that a significant impact will occur. As discussed in Section 5.17, Water Quality, the project would implement various construction and post-construction BMPs, and compliance with applicable water quality requirements, including those of the City and Regional Water Quality Control Board (RWQCB), and other applicable federal, state, and local regulations. Compliance with applicable regulations would preclude potentially significant water quality impacts from occurring to receiving waters as a result of the project. Cumulative development under buildout of the General Plan would also be required to demonstrate compliance with state and local water quality regulations. If projects are not compliant, mitigation measures would be required in order to ensure water quality impacts do not occur.

As discussed in the City's General Plan PEIR, future development implemented consistent with the General Plan would be subject to comply with all NPDES permit requirements, prepare a Water Pollution Control Plan and SWPPP, if applicable, comply with Stormwater Regulations, and the City's Stormwater Standards Manual. Through compliance with the existing regulatory framework, cumulative impacts associated with development in the city would be less than significant (City of San Diego 2024). As the project would result in less-than-significant impacts for water quality, the project's contribution to cumulative water quality impacts would **not be cumulatively considerable**.

6.1.18 WILDFIRE

The cumulative context for wildfire risk impacts is all of San Diego County including the city and surrounding wildland-urban interface (WUI) area, as these impacts depend on the specific conditions and features on the project site and surrounding wildlands. Because post-fire hazards are site-specific these concerns would not combine with other development resulting in a cumulative effect. Therefore, post-fire hazards are not addressed on a cumulative level.

As discussed in Section 5.18, Wildfire, the project would not impair or physically interfere with an adopted emergency response or evacuation plan and the project would comply with applicable state and City standards associated with fire hazards and prevention, including alternative compliance measures. The project would not exacerbate wildfire risks, due to slope, prevailing winds, or other factors, thereby exposing fire station employees to pollutant concentrations from a wildfire or the

uncontrolled spread of a wildfire. The installation and maintenance of associated infrastructure would not exacerbate wildfire risk during construction or operation or result in temporary or ongoing impacts to the environment beyond those disclosed in this EIR.

The City's General Plan PEIR indicates that cumulative impacts to the exposure of people and structures to wildfire and exposure to pollutant concentrations resulting from wildfire, cumulative impacts associated with storm water, water distribution, wastewater, and communications systems, and cumulative impacts related to exposure of people and/or structures to significant risks because of runoff, post-fire slope instability or drainage changes would all be significant. Cumulative impacts related to emergency evaluation would be less than significant (City of San Diego 2024).

As the project would result in less-than-significant impacts related to wildfire, the project's contribution to the significant wildfire cumulative impact identified in the General Plan PEIR would **not be cumulatively considerable**.

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CHAPTER 7 EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the CEQA Guidelines requires that an EIR briefly describe potential environmental effects that were determined not to be significant and, therefore, were not discussed in detail in the EIR. Based on initial environmental review, the City determined that the proposed Fairmount Avenue Fire Station Project (project) would not have the potential to cause significant impacts associated with the areas discussed below.

7.1 AGRICULTURAL AND FORESTRY RESOURCES

The project proposes to develop a fire station on a portion of 1.28 acres of undeveloped land within the city. The project site is designated Industrial Employment in the City's General Plan (City of San Diego 2024). The majority of the site is zoned Residential-Single Unit (RS-1-7), with a small area zoned Open Space-Park (OP-2-1). The project also includes a small off-site area adjacent to the site and within an existing roadway (47th Street) for a sidewalk and access improvements and a 0.52-acre temporary construction staging area for construction equipment and materials that is currently a disturbed site approximately 0.40 miles southwest of the project site. The project site is undeveloped and contains a mix of coastal sage scrub and mixed chaparral and is surrounded by existing residential, light industrial and public uses to the northeast, east and south. Open space borders the site to the west and southwest along with an elevated section of Fairmount Avenue. The site is bordered by 47th Street to the east. There are no trees present on the site and the site is not zoned for forest land or timberland, as defined in PRC Sections 12220(g) and 51104(g).

The project site is classified as "Urban and Built-Up Land" under the California Department of Conservation's Farmland Mapping and Monitoring Program and does not contain any land defined as Prime, Unique, or Farmland of Statewide Importance (California Department of Conservation 2024). Urban and Built-Up Land is defined as land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. Common examples of uses where this designation is applied include residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes. The site has not been used for agricultural activities and does not include land under a Williamson Act contract.

Therefore, the project would result in **no impact** on agricultural and forestry resources.

7.2 MINERAL RESOURCES

According to the City of San Diego General Plan – Conservation Element, the project site is designated as Mineral Resource Zone (MRZ)-3 (City of San Diego 2024). The MRZ-3 designation includes areas containing mineral deposits, the significance of which cannot be evaluated from

available data. Despite the known mineral resource designation of the project site, the City has not identified the project site as a locally important mineral resource recovery site. Further, the site (1.28-acres) is not large enough to allow for economically aggregate mining operations. Sites smaller than 10 acres are unlikely to accommodate economically feasible operations.

In addition, the surrounding area has experienced increased urbanization and development with residential and commercial land uses that are incompatible with typical mineral extraction and processing operations. Similarly, the project site and surrounding area have historically and are currently designated and zoned for uses that would preclude mineral resource operations. Due to the developed nature of the surrounding area and the size of the project site it would not be feasible or practical for the site to be mined for any mineral resources. Additionally, the proposed use of the site as a fire station would not preclude a mining operation adjacent to or surrounding the site. Therefore, development of the project site would not result in the loss of mineral resources of statewide or local importance or loss of a locally important mineral resource recovery site. **No impact** would result.

7.3 POPULATION AND HOUSING

The project proposes to develop a fire station that would introduce temporary construction workers that are assumed to live within the region and would not permanently relocate to the area. Project operation would require a total of 12 fire fighters and rescue staff. It is not anticipated all 12 new fire station staff positions would relocate to this area of then city, but even if that were the case it is assumed existing housing would be available and it would not be a catalyst to induce new residential development. The increase of 12 new staff positions would not be considered great enough to warrant new housing or alter the overall population of the area. The fire station is a planned facility within the San Diego Fire Department's service area to ensure adequate response time is provided to serve existing and planned development. In addition, because the site is vacant the project would not displace existing people or housing. The project would not directly or indirectly induce unplanned population growth or displace existing people or housing resulting in **no impact**.

CHAPTER 8 MANDATORY DISCUSSION AREAS

This chapter addresses significant environmental impacts that cannot be avoided if the proposed Fairmount Avenue Fire Station 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 WHICH CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED

Section 15126.2(c) of the California Environmental Quality Act (CEQA) Guidelines requires an environmental impact report (EIR) to identify significant environmental effects which cannot be avoided if the project is implemented (14 CCR 15000 et seq.). As discussed in Chapter 5, Environmental Analysis, of this EIR, implementation of the proposed project would result in potentially significant impacts related to the following issue areas: air quality, biological resources, historic, and tribal cultural resources. Incorporation of mitigation measures would reduce all potentially significant impacts to a less-than-significant level.

8.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES CAUSED BY THE PROJECT

CEQA Guidelines Section 15126.2(d) requires the evaluation of significant irreversible environmental changes that would occur should a project be implemented, as follows:

- (1) Uses of a large amount of nonrenewable resources;
- (2) Primary impacts and secondary impacts, such as highway improvements which provides access to a previously inaccessible area;
- (3) Environmental accidents potentially associated with the project; and
- (4) 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 loss of nonrenewable resources such as agricultural land, mineral resources, water bodies, historical resources, paleontological resources, or tribal cultural resources.

As discussed in Chapter 2 of this EIR, Environmental Setting, the project site consists of a vacant site adjacent to 47th Street and nearby residential and commercial uses. The project site is designated Industrial Employment in the General Plan, and as Industrial in the Mid-City: City Heights Communities Plan. The site is zoned OP-2-1 (Open Space) and RS-1-7 (Residential-Single Unit) in the City's Zoning Code.

The project site does not contain agricultural or forestry resources, as 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 (CDC 2024). No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is present on site or would be impacted as a result of the project.

As discussed in Chapter 7, Effects Found Not to be Significant, the project site is designated as MRZ-3. The project site and surrounding area are urbanized and designated and zoned for uses that would preclude mineral resource operations. Therefore, it would not result in the loss of mineral resources of statewide or local importance.

The proposed 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 would be required to comply with the California Energy Code (Title 24) and California Green Building Standards Code. The proposed project includes electric vehicle charging stations, low flow plumbing fixtures and a solar ready design (e.g., features to facilitate rooftop solar at a later date) to minimize its consumption of energy and non-renewable resources (see Section 5.5, Energy and Section 5.7, Greenhouse Gas Emissions, for further details). Use of these resources on any level would have an incremental effect regionally and would result in an incremental long-term irretrievable loss of non-renewable fuel.

The site contains biological resources, including sensitive habitat and protected plant and wildlife species. More specifically, the site contains Diegan coastal sage scrub habitat. The following sensitive wildlife species were determined to have moderate potential to occur within the project area: coastal California gnatcatcher, Cooper's Hawk, wrentit, and Crotch's bumble bee. The project would result in potentially significant impacts to 0.49 acre of mixed chaparral and coastal sage scrub (Issue BIO-1). The nearest wetland resource is more than 70 feet north of the project impact area. Given the characteristics of the wetland and site development, the wetland buffer width would be adequate to preserve the functions and values of the wetland resources that are adjacent to the project impact footprint in accordance with the City's Biology Guidelines. No wetland buffer is required at the off-site construction staging area since no permanent structures or development are proposed. Thus, no significant irreversible impacts to water bodies would occur. Refer to Section 5.4, Biological Resources, for additional details. The project would implement habitat mitigation for coastal sage scrub (**MM-BIO-1**) in accordance with the City of San Diego Biology Guidelines. The project would also implement **MM-BIO-2**, requiring avoidance of Crotch's bumble bee active nest colonies during construction activities and **MM-BIO-3**, requiring preconstruction surveys and other measures to avoid take of least Bell's vireo and southwestern willow flycatcher. Additionally, the project would implement avoidance and resource protection measures the City has developed to

ensure compliance with the City's Biology Guidelines and MSCP. With the implementation of these measures, impacts to biological resources would be less than significant.

Implementation of the proposed project has the potential to result in air quality impacts due to construction activities, which could expose people or workers to a cancer risk above the 10 in 1 million threshold. The project would include **MM-AQ-1**, which requires use of Tier 4 Interim engines or better, to reduce this potential to below a level of significance, as detailed in Section 5.3, Air Quality.

Although no known significant cultural resources were identified at the project site, construction of the project could result in potential impacts to unknown subsurface cultural resources. In the event an unknown, intact archaeological resource, burial-related items, or unknown tribal cultural resource are encountered during project construction, the potential disturbance to the site would be a potentially significant impact (Issues HIST-1, HIST-3, and TCR-1). Compliance with **MM-HIST-1** would reduce impacts to less-than-significant with mitigation.

The project would not involve extension or construction of a new roadway or highway that would provide access to previously inaccessible areas. The project includes no additional public roadways, and access to the site would be from 47th Street. Therefore, the proposed project would not result in significant irreversible environmental changes.

As discussed in Section 5.8, Health and Safety, the project would follow applicable health and safety related regulations to prevent any spills or hazardous material use, transport, or disposal from resulting in significant environmental accidents. Thus, no significant environmental accidents would occur as a result of the project.

8.3 GROWTH-INDUCING IMPACTS

Section 15126.2(e) 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 2 and half years (see Chapter 3, Project Description, Section 3.2.9, Grading and Construction). 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 is a fire station and does not propose new residential development. Therefore, the project would not contribute to the City's population and would, instead serve existing development and future planned development. The project would not directly induce substantial growth through the development of residential land uses on a vacant site.

Regarding infrastructure, the properties surrounding the project site consist of residential and commercial development that is served by existing public service and utility infrastructure. As discussed in Section 5.14, Public Utilities, the project would tie into existing utility connections to accommodate the internal utility infrastructure needs of a fire station. No major new infrastructure facilities are required specifically to accommodate the 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 existing and planned capacity. The project would not remove a barrier to economic or population growth through the construction or connection of new public utility infrastructure contributing to substantial population growth.

CHAPTER 9 ALTERNATIVES

9.1 INTRODUCTION

CEQA requires that an EIR contain an analysis of alternatives to a 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 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 (14 CCR 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 (14 CCR 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 (14 CCR 15126.6[e]).

Pursuant to the CEQA Guidelines, a range of alternatives for the Fairmount Avenue Fire Station Project (project) is considered in this EIR. This chapter describes the project alternatives selected for analysis, evaluates the environmental impacts associated with them, and compares the impacts with those of the proposed project. This chapter also identifies those alternatives considered by the City but not carried forward for detailed analysis and explains the basis for the City's decision.

These alternatives were developed in the course of project planning, environmental review, and public input. The discussion in this section provides a description of alternatives considered and rejected, and an analysis of whether the alternatives meet most of the objectives of the project.

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.

9.2 PROJECT OBJECTIVES

The following are the goals and objectives of the project:

1. Increase the current and future capacity of the San Diego Fire-Rescue Department by constructing a new fire station to serve the eastern portion of its service area.
2. Meet the San Diego Fire-Rescue Department's 7 minute and 30 second response time to the eastern portion of the service area that is currently underserved.
3. Obtain a site large enough to accommodate a new fire station, free of constraints including flooding, toxic contaminants, power lines, in an area with limited traffic.
4. Provide a cohesive design that is compatible in use, scale and character with the surroundings.
5. Integrate the project into the existing topography of the site in a manner that reduces the grading footprint as well as impacts to environmental resources.

9.3 SIGNIFICANT IMPACTS

In conformity with CEQA, the purpose of this analysis is to focus on alternatives that are potentially feasible and that would avoid or substantially lessen any of the significant effects of the project. The analysis in Chapter 5, Environmental Analysis, Sections 5.1 through 5.18, finds that implementation of the project would not result in any significant and unavoidable environmental impacts. Therefore, this Alternatives analysis considers those less-than-significant impacts (with or without mitigation) that could be further reduced through an alternative to the project. The project alternatives evaluated below were developed to reduce the project's environmental impacts.

9.4 ALTERNATIVES UNDER CONSIDERATION

This analysis focuses on alternatives capable of avoiding or substantially lessening the environmental 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."

9.4.1 DEVELOPMENT OF PROJECT ALTERNATIVES

In developing the project alternatives evaluated in this EIR, the EIR preparers worked with City staff to explore various modifications to the proposed project that could reduce environmental effects while responding to the project objectives. This effort focused first on reducing the project's impacts to biological resources, cultural and tribal cultural resources, and noise which could be reduced to less-than-significant levels with mitigation. The Alternatives selected for analysis do not reduce all of the concerns mentioned above but have been selected for their ability to reduce the most significant project impacts.

9.4.2 ALTERNATIVES CONSIDERED BUT REJECTED AS INFEASIBLE

As described above, Section 15126.6(c) of the CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible for detailed study, and briefly explain the reasons underlying the lead agency's determination. Furthermore, Section 15126(f)(1) states that "among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries and whether the proponent can reasonably acquire or control or otherwise have access to the alternative site. No one of these factors established a fixed limit on the scope of reasonable alternatives."

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. 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.

The City of San Diego Fire-Rescue Department, Logistics Division conducted a lengthy site selection process that evaluated the feasibility of siting the fire station on various properties within a specific geographic area that had a gap in service (e.g., extended emergency response times) and met certain size requirements. Due to a variety of reasons including location within a 100-year floodplain and noise concerns due to proximity to a police department gun range and Highway 94 sites were removed from consideration. Three sites that were potentially feasible for the fire station but were ultimately rejected as infeasible are discussed in more detail below.

- A parcel located at the northeast corner of the intersection of **Beech Street and 38th Street**, approximately one mile west of the proposed project site, was evaluated as a potential site. This site is designated Industrial Employment in the City's General Plan and

zoned IL-3-1 and spans 2.88 acres over one developed parcel. However, it was determined that the site was not available for purchase; therefore, it was rejected as infeasible.

- Another site was considered at the northeast corner of the intersection of **Home Avenue and Fairmount Avenue**, approximately 0.3 miles northwest of the proposed project site. The site is designated Park, Open Space, & Recreation and Residential in the City's General Plan and zoned OR-1-1 and spans 0.75 acres across one undeveloped parcel. This site posed several design challenges, including the size of the parcel which had limited development potential. This site was ultimately ruled out and determined to be infeasible because it was not for sale and had less than 0.75 acres that would be developable. Typically, a new fire station requires 0.75 acres or more in size.
- The San Diego Police Pistol Range at Federal Boulevard at Home Avenue was ruled out because the site was designated a historical landmark in 2005 as Historical Resources Board (HRB) #726. The designation includes the site, the exterior of the Revolver Club Office Building, and the Pistol Range Clubhouse. Additionally, the site is within a Special Flood Hazard Area in a Floodway (Figure 9-1) with significant limitations to grading and filling under the City's Municipal Code. Furthermore, the property is identified on the GeoTracker website as being a cleanup program site with copper, lead, zinc, and other metal potential contaminants of concern. Metal contamination at the site can be attributed to metal dusts from gunfire from historical use of the site as a firing range. Remediation would be required in accordance with DEHQ requirements (DUDEK 2025; SWRCB 2025).

The following alternatives have been identified for analysis: No Project/No Development Alternative, No Project/General Plan Development Alternative, Site Location Alternative, and Reduced Footprint Alternative.

9.5 ENVIRONMENTAL ANALYSIS

This analysis focuses on alternatives capable of avoiding or substantially lessening the environmental effects of the project, even if the alternatives would impede, to some degree, the attainment of project objectives.

9.5.1 NO PROJECT/NO DEVELOPMENT ALTERNATIVE

CEQA Guidelines Section 15126.6(e) requires that an EIR evaluate a "no project" alternative, along with its impacts. The purpose of describing and analyzing a no project alternative is to allow a lead agency to compare the impacts of approving the project to the impacts of not approving it. Specifically, Section 15126.6(e)(3)(B) requires that an EIR for a development project on an identifiable property address the no project alternative as circumstances under which the project

does not proceed. This No Project/No Development Alternative assumes that no development would occur, and the project site would remain as undeveloped land. As no changes would occur, the No Project/No Development would avoid all significant impacts of the project and no further detailed analysis is warranted.

9.5.2 NO PROJECT/GENERAL PLAN DEVELOPMENT ALTERNATIVE

The second “no project” alternative to be evaluated assumes that the project would not proceed; instead, the project site would eventually be developed according to the land use designation and assumptions in the City’s General Plan and M CCP (City of San Diego 2024; City of San Diego 2015). As the site is designated by the General Plan for Industrial Employment and conceptualized in the M CCP to support general industrial uses, it is reasonable to assume that absent the proposed project, the project site could instead be developed with light manufacturing, storage and distribution, and office or commercial uses accessory to the primary industrial use. It is assumed the entire 1.28-acre site would be developed. It is assumed the same off-site construction staging area would also be required. The project site is zoned OP-2-1 (Open Space) and RS-1-7 (Residential-Single Unit) in the City’s Zoning Code (City of San Diego 2024). It is assumed a re-zone would be required.

Comparative Analysis of Environmental Effects

Land Use

The No Project/General Plan Development alternative would not conflict with the environmental principles, goals, and policies contained within the General Plan or the M CCP as this alternative would develop the project site consistent with the land use designation in the General Plan and M CCP. Similar to the project, this alternative would not divide an established community, as it would be constructed within the same project site.

This alternative would be consistent with the General Plan’s Noise Element as this alternative would be required to comply with applicable existing local and state noise regulations per General Plan Policy NE-A.1 or implement mitigation measures to comply with existing noise regulations to be consistent with the General Plan’s Noise Element. Similar to the project, this alternative would be consistent with the General Plan’s Historic Preservation Element with implementation of **MM-HIST-1**, which requires an Archaeological and Native American monitoring program, consistent with General Plan Policy HP-A.4. As this alternative is at the same site as the project, this alternative would be located within the Airport Influence Area for the San Deigo International Airport – Review Area 2 of the ALUCP; however, development proposed under this alternative would be subject to airport land use compatibility or Airport Land Use Compatibility (ALUC) review if it exceeds 200 feet or has received a FAA notice and would not conflict with the San Diego International Airport’s ALUCP. The alternative

would not result in a conflict with the provisions of the City's MSCP Subarea Plan or other approved local, regional, or state habitat conservation plan with implementation of **AM-BIO-1a**, **AM-BIO-1c**, **AM-BIO-2**, and **MM-BIO-3**, same as the project. This alternative could be inconsistent with the City's CAP and, thus, the General Plan's Conservation Element policies, but would be required to implement mitigation measures that reduce GHG emissions. Overall, this alternative could result in slight increase in land use impacts as compared to the project.

Transportation/Circulation

Similar to the project, this alternative would not result in inadequate emergency access or create hazardous design features. For any encroachment into the public right-of-way including sidewalks, parking spaces, medians during construction, a traffic control plan/permit would be required to be prepared and submitted to the City, the same as the project. For any lane closures or sidewalk closures during construction, a traffic control plan would be prepared. Development under this alternative would be required to be designed and constructed per applicable City design standards and comply with emergency access requirements of the SDFD and the City. Impacts associated with inadequate emergency access and hazardous design would be less than significant, similar to the proposed project. This alternative would also be consistent with plans, policies, and regulations related to the transportation system, similar to the proposed project.

The industrial use developed under this alternative would be required to perform a VMT analysis consistent with the City's adopted Transportation Study Manual (TSM). If a VMT transportation impact would occur, it is presumed that mitigation measures would be implemented to reduce the alternative's VMT impact to a level of less than significant. In comparison to the project, this alternative could have a more severe VMT impact due to the increase in the number of employees and delivery vehicles accessing the site. However, it is assumed all impacts would be reduced to less-than-significant with potential mitigation incorporated. Overall, this alternative could result in a small increase in severity of transportation/circulation impacts as compared to the project.

Air Quality and Odor

Under this alternative, criteria air pollutant emissions could be increased in comparison to the project, due to a larger development footprint proposed under this alternative potentially developing the entire 1.28-acre site. A larger building footprint would require more ground disturbance, including grading and the use of more construction equipment in comparison to the project, which could result in increased construction emissions. Similar to the project, the construction emissions could result in a potential Maximum Individual Cancer Risk at nearby residential receptors that would exceed the 10 in a million cancer risk threshold. A potentially significant impact in regard to cancer risk resulting from TAC emissions generated during

construction (**Impact Issue 4**) would be reduced, the same as the project. Similar to the project, **MM-AQ-1**, which requires the use of CARB-certified Tier 4 final off-road equipment during construction, would be implemented under this alternative to reduce exhaust PM₁₀ (DPM) emissions. Implementation of **MM-AQ-1** would reduce the impact to less than significant. Construction emissions are anticipated to be below the Chronic Hazard Index threshold, similar to the project.

Once operational, this alternative could result in increased operational emissions in comparison to the project as an industrial use could require more mobile source emission generators, area source emission generators, and energy use. Similar to the project, odors produced during construction would be short-term and occur at magnitudes that would not affect substantial number of people. Operation of this alternative would not include a use typically associated with odors. Thus, odor impacts would be similar to the project. Overall, this alternative could result in an increase in air quality impacts as compared to the project.

Biological Resources

No biological resource impacts would be reduced with this alternative as this alternative would develop the entire 1.28-acre site. Similar to the project, this alternative would still result in potentially significant direct impacts to sensitive vegetation communities and special-status wildlife and potentially indirect impacts to vegetation communities, special-status plants, and special-status wildlife (**Impact Issues 1 and 2**). As such, this alternative would similarly implement **MM-BIO-1**, which includes a payment to the City's Habitat Acquisition Fund or deduction of credits from the Marron Valley Cornerstone Land Bank, which occurs inside the MHPA, **MM-BIO-2**, which requires pre-construction surveys to identify the presence of Crotch's bumble bee and/or nest colonies and other requirements if Crotch's bumble bee is present at the site, and **MM-BIO-3**, which requires that MHPA boundaries and the requirements regarding the least Bell's vireo and southwestern willow flycatcher are shown on the construction plans prior to the issuance of a grading permit. Additionally, this alternative would similarly implement **AM-BIO-1a** through **AM-BIO-1c**, which include standard permit measures that would be taken prior to construction, during construction, and post-construction to protect vegetation communities and special-status plants and wildlife, **AM-BIO-2**, which would implement MSCP LUAG compliance measures specific to the Coastal California gnatcatcher, and **AM-BIO-3**, which would revegetate the temporary disturbance of Diegan coastal sage scrub within the off-site construction staging area.

As this alternative would develop the entirety of the site, there could be direct impacts to jurisdictional resources and wetlands. Similar to the project, this alternative would result in indirect impacts to adjacent jurisdictional resources that would be reduced to less than significant through implementation of avoidance and resource protection measures (**AM-BIO-1a** through **AM-BIO-1c**)

and standard construction stormwater pollution prevention requirements (**Impact Issue 3**). This alternative would result in less-than-significant indirect impacts to wildlife corridors or habitat linkages through compliance with the LUAG (**Impact Issue 4**), same as the project. This alternative would not conflict with the provisions of the MSCP (**Impact Issue 5**) with implementation of **AM-BIO-1a**, **AM-BIO-1c**, **AM-BIO-2**, and **MM-BIO-3**, same as the project. As this alternative would occur on the same site as the project, this alternative would occur adjacent to the MHPA and is therefore required to document compliance with the MSCP LUAG to mitigate for potential adverse edge effects that would otherwise result in a potentially significant impact (**Impact Issue 6**). The project would be consistent with the City's ESL Regulations and Biology Guidelines (**Impact Issue 7**). All other direct and indirect impacts associated with biological resources would be less than significant. Impacts to biological resources would increase in severity in comparison to the project.

Energy

Similar to the project, this alternative would increase electricity, natural gas, and petroleum use during construction and operation as a result of developing a currently undeveloped site. Energy consumption associated with construction and operation of this alternative could be increased due to the larger building footprint and full buildout of the site; however, the same as the project, it is anticipated energy consumption would not be inefficient or wasteful.

As this alternative would be required to comply with Title 24, Part 6 and Part 11 of the California Building Code, it 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, energy impacts would generally be similar to the project.

Geologic Conditions

This alternative would be constructed on the same project site, with the same underlying geotechnical conditions. Therefore, similar to the project, with implementation of the recommendations and appropriate building design measures consistent with the California Building Code and City requirements, the risk of potential effects from geologic hazards would be reduced to an acceptable level of risk. 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 NPDES requirements, associated potential erosion and sedimentation impacts from implementation of this alternative would be less than significant, the same as the project.

Greenhouse Gas Emissions

Under this alternative, construction GHG emissions could increase in comparison to the project as this alternative would involve development of the entire site, which would require more ground

disturbance and the use of more construction equipment. Operation of an industrial use could require more mobile source emission generators, area source emission generators, and energy use, which would result in increased operational GHG emissions. This alternative would be required to demonstrate consistency with the City's CAP. If this alternative conflicts with the City's CAP, mitigation measures that reduce GHG emissions would be required. Overall, this alternative could result in increased GHG emissions impacts as compared to the project.

Health and Safety

This alternative would have the same potential risks associated with health and safety as the project, as it would be constructed on the same project site. The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and a significant hazard to the public or environment would not result. No existing structures/buildings or soil contamination containing hazardous materials would be disturbed by construction of this alternative. Any hazardous materials used during construction or operation would be transported, stored, 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, the same as the project.

As discussed in Section 5.8, Health and Safety, the project site is located within 450 feet of an elementary school located to the southeast. As an industrial use, the operation of this alternative could be associated with the potential use of hazardous materials. Operational protocols and safety measures set forth by the relevant federal, state, or local regulations would be in place to manage and reduce any risks associated with the potential use of hazardous materials. It is assumed 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 are minimized and that such substances are handled appropriately in the event of accidental release and would not result in emissions of acutely hazardous materials, substances, or waste within 0.25 miles of the existing school.

The project site is located within the San Diego Airport Influence Area (San Diego International Airport – Review Area 2), Airport Land Use Compatibility Overlay Zone. ALUC review is required for land use plans and regulations within Review Area 2 that propose buildings or uses that exceed the 200-foot height limit and for land use projects that; have received from the FAA a Notice of Presumed Hazard, a Determination of Hazard or a Determination of No Hazard subject to conditions, limitations or marking and lighting requirements, and/or would create glare, lighting, electromagnetic interference, dust, water vapor, smoke, thermal plumes, and bird attractant hazards. The development proposed under this alternative would be subject to airport land use compatibility or ALUC review if it exceeds 200 feet or has received a FAA notice for one of the reasons listed above and is not anticipated to result in a safety hazard for people working in a designated airport influence area. Furthermore,

because the project site is located outside any designated noise contours or Safety Zones associated with the San Diego International Airport, the project is not expected to pose additional risks to employees on site from airport operations. Impacts associated with health and safety would be similar to the project.

Hydrology

This alternative would include development of the entire project site increasing the amount of impervious surfaces; thereby, increasing the quantity of stormwater runoff, alteration of the regional drainage pattern, flooding, and reduction in onsite groundwater recharge. However, the same as the project, this alternative would be required to include drainage control improvements that retain/detain peak stormwater flows onsite to ensure no increase in stormwater flows relative to existing conditions.

As discussed in Section 5.9, Hydrology, the project site encroaches on the 100-year and 500-year flood zone associated with Chollas Creek. As this alternative would develop the entirety of the project site, it is expected that development of this alternative could be located within the 100-year or 500-year flood zones. Therefore, this alternative could result in an increase in severity of flood hazard impacts. Further, implementation of this alternative would require conformance with federal, state, and local regulations related to hydrology and drainage, the same as the project. As such, this alternative would not result in increased runoff or have an adverse effect on drainage patterns, similar to the project. Overall, this alternative could result in a slight increase in severity of hydrology impacts as compared to the project.

Noise

Under this alternative, construction noise and vibration could increase in comparison to the project as this alternative would involve development of the entire site, which would require more ground disturbance, grading and the use of more construction equipment leading to a longer construction schedule and an increase in construction noise and vibration. If temporary construction exceeds 75 dBA L_{eq} at a residentially zoned receptor, it would be considered significant. If a construction noise impact would occur, it is presumed that mitigation measures would be implemented to reduce construction noise to a level of less than significant. Operational noise could increase under this alternative in comparison to the project; however, operational noise generated by the alternative would be required to comply with the City's 50 dBA L_{eq} daytime threshold and 40 dBA L_{eq} nighttime threshold for single-family residential land uses at the nearest noise sensitive receptor the same as the project. No operational vibration impacts are anticipated to occur with development of this alternative, the same as the project.

Similar to the project, once construction of the alternative is complete, the alternative 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.

Traffic noise associated with operation of this alternative could increase in comparison to the project as this alternative could result in more daily vehicle trips. The alternative would have to roughly double traffic volumes on nearby roadway segments to increase traffic noise by 3 dBA, which would be considered a barely perceptible increase. Although traffic noise could increase in comparison to the project, impacts are expected to remain less than significant the same as the project. Siren noise would be avoided by this alternative, this noise source is not a significant impact under the proposed project, and this slight reduction in noise would likely be offset by increased traffic noise and/or operational noise from light industrial activities.

Similar to the project, the site is not located within an Airport Environs Overlay Zone and is not within a 60 dBA CNEL contour and would not subject future potential employees of the industrial use to noise levels associated with an airport to above 65 dBA CNEL levels. Overall, this alternative could result in a slight increase in noise impacts as compared to the project.

Paleontological Resources

As discussed in Section 5.11, Paleontological Resources, the project site is underlain with formations that have a moderate- to high-resource potential for the occurrence of sensitive paleontological resources. As this alternative would develop the entirety of the project site the potential exists for scientifically significant paleontological resources to be unearthed given the underlying paleontologically sensitive deposits and depth of potential construction-related excavation activities needed to develop this alternative. Similar to the project, this alternative would be subject to compliance with the City's grading ordinance (SDMC Section 142.0151) and if proposed grading exceeds applicable thresholds, the requirement for paleontological monitoring would be made a condition of approval. Additionally, this alternative would be required to comply with the City's Paleontological Guidelines identified in Appendix P of the Land Development Manual. Paleontological monitoring conducted in accordance with the Municipal Code and Appendix P of the Land Development Manual would ensure no significant impacts would occur, the same as the project.

Historical Resources

As discussed in Section 5.12, Historical Resources, the project area of potential effects (project APE) is located within close proximity to Chollas Creek, which was used by local Native Americans as a valuable source of resources and as a travel route, as a known village is located along the creek. Due

to the project site's close proximity to Chollas Creek, the potential exists for unknown buried archeological and Native American resources to occur.

As this alternative would develop the entire project site the potential exists for unknown buried archeological and Native American resources to be unearthed during ground disturbance associated with construction. Similar to the project, this alternative would be required to implement **MM-HIST-1**, to ensure impacts to historical resources are reduced to a level below significance. Thus, this alternative would have less-than-significant impacts with mitigation incorporated, the same as the project.

Public Services and Facilities

This alternative would include the construction of light manufacturing, storage and distribution, or office or commercial uses accessory to the primary industrial use and would not introduce new dwelling units or increase the population base within the fire protection service area, the same as the project. Thus, this alternative would not generate a substantial increase in additional demand for fire protection and emergency services within the specified service area beyond what is currently anticipated under the General Plan.

The existing police facilities would continue to serve the project site, and this alternative would not result in the need for new or expanded police station facilities in order to maintain acceptable service ratios, response times, or other performance objectives, similar to the project. This alternative would not introduce a new population base that would require parks and other recreation facilities or contribute to an increase in demand for new educational/library facilities or the expansion of existing ones, the same as the project. Thus, impacts associated with this alternative would be less than significant, the same as the project.

Public Utilities

Water

In accordance with the City's Design Guidelines and Standards, the water demands for this alternative would be developed and a Sewer and Water study would be prepared. As this alternative would develop the entirety of the site, the estimated water demands could increase in comparison to the project and require the construction of new or expanded public utilities and increase demand for water needed to serve the project. Similar to the project, this alternative could tie into the City's existing 8-inch water main located in 47th Street and any associated water infrastructure would be designed and sized to meet the project's water needs in conformance with City standards. This alternative is not anticipated to result in the need to comply with SB 610. Overall, water impacts could be increased under this alternative in comparison to the project.

Wastewater

An existing sanitary sewer line and sewer manhole are located within the 47th Street right-of-way. As this alternative would be developed at the same site as the project, this alternative could connect to the existing infrastructure via new sewer lines without resulting in any modifications to the existing sewer system in the project vicinity. The wastewater or sewer generation for this alternative would be required to be developed in accordance with the City's Sewer Design Guide. As this alternative would develop the entirety of the site, the estimated population and wastewater generation could increase in comparison to the project. Therefore, although wastewater and sewer generation would be required to be developed in accordance with the City of San Diego Sewer Design Guide, wastewater impacts would be increased under this alternative as compared to the project.

Solid Waste

This alternative would be required to comply with AB 1327 and AB 34, by following the City's recycling ordinance, and the C&D Debris Deposit Ordinance by submitting a Waste Management Form with the building permit application demonstrating that at least 75% of the waste generated during project construction would be recycled. Because the project is a public facility it is not required to submit a Waste Management Form to demonstrate compliance with the ordinance.

The majority of waste generated during grading and construction would consist of export soil. This alternative would develop the entirety of the site and would require more grading and ground disturbance in comparison to the project, which could result in an increase in net soil export. Thus, this alternative would result in increased construction solid waste impacts. However, at least 75% of the soil exported from the site would be sent to facilities for reuse. Construction solid waste impacts would be slightly increased in comparison to the project.

Solid waste generated during operation of this alternative could also increase in comparison to the project. However, this alternative would be required to comply with the Refuse, Organic Waste, and Recyclable Material Storage Regulations by providing bins for organic waste and recycling within the trash enclosure. This alternative would also be required to comply with the City's General Plan waste management policies (PF-I.1. and PF-I.2.), in relation to providing efficient waste collection services and maximizing waste reduction. Therefore, operation solid waste impacts would be similar to the project.

Overall, solid waste impacts associated with this alternative would be slightly increased in comparison to the project.

Water Conservation

This alternative would be required to incorporate water sustainable design features, techniques, and materials that would reduce water consumption, as required by the California Building Code. Landscaping would be required to include drought-tolerant native vegetation and low water use plants that has been designed in accordance with the City's Land Development Manual, Landscape Standards, and other applicable city and regional standards. As this alternative would be required to be consistent with applicable water conservation requirements, impacts would be less than significant, same as the project.

Overall, public utilities impacts would be increased under this alternative.

Tribal Cultural Resources

As discussed in Section 5.15, Tribal Cultural Resources, the project APE is located within close proximity to Chollas Creek, which was used by local Native Americans as a valuable source of resources and as a travel route. As such, any ground disturbing construction activities have the potential to impact unknown tribal cultural resources and Native American resources.

As this alternative would develop the project site the potential exists for unknown tribal cultural resources and Native American resources to be disturbed during ground disturbance associated with construction. Similar to the project, this alternative would be required to implement **MM-HIST-1** to ensure that impacts to tribal cultural resources are reduced to a level below significance. Thus, this alternative would have less-than-significant impacts with mitigation incorporated, the same as the project.

Visual Effect and Neighborhood Character

Visual impacts could be increased in comparison to the project, as this alternative would require a larger building footprint. This alternative would not block any existing public views as none of the public views identified in the M CCP provide views of the project site and the General Plan does not identify a scenic vista or public view corridor in the project area, same as the project. Similar to the project, this alternative would be required to comply with the City's design guidelines and would not result in bulk, scale, materials, or style that would be incompatible with surrounding development or result in a negative site aesthetic. Proposed lighting on-site would be required to comply with the City's Municipal Code, the same as the project. Overall, this alternative could result in a slight increase in visual effects and neighborhood character impacts due to a more industrial development.

Water Quality

This alternative would be required to comply with the NPDES permit program similar to the project, during construction. Under the NPDES permit program, BMPs are mandated for construction sites in which grading would be greater than 1 acre, through preparation of SWPPPs in order to reduce the occurrence of pollutants in surface water. Temporary construction BMPs would typically include street sweeping, waste disposal, vehicle and equipment maintenance, concrete washout area, 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 this alternative, would ensure that short-term impacts from construction-related activities would not violate any water quality standards or Waste Discharge Requirements (WDRs) and not further contribute to water quality impacts identified in the CWA Section 303(d) List of Water Quality Limited Segments.

During operation, similar to the project, specific site design, source control, and treatment control BMPs, Low Impact Development practices, and project design measures would be implemented by this alternative in accordance with regulations to ensure proposed water quality would not degrade further beyond existing conditions. Moreover, drainage flow volumes would remain the same as under existing conditions or would decrease following project implementation. Therefore, 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 generally be the same as the project under this alternative.

Wildfire

The project site is not designated as a Very High Fire Hazard Severity Zone (FHSZ) according to CAL FIRE or City maps; however, the areas immediately surrounding the project site are mapped as a Very High FHSZ. As such, construction and operation of this alternative could result in increased exposure of people and structures to wildland fire and exacerbate wildfire risk. Similar to the project, the alternative would be required to include project features for development in wildland urban interface areas to minimize structural ignitions. The installation and maintenance of associated infrastructure could introduce new ignition sources into a fire hazard area and exacerbate wildfire risk.

Similar to the project, this alternative would not impair implementation of, or physically interfere with an adopted emergency response or evacuation plan and the alternative would comply with applicable state and City development standards associated with fire hazards and prevention,

including any alternative compliance measures. Overall, this alternative could result in a slight increase in the severity of wildfire impacts due to the presence of more potential sources of ignition due to more employees and the type of industrial use that could be developed.

Impact Summary

The issue areas that would result in less-than-significant impacts with or without mitigation under the project that could result in a slight increase in severity under the No Project/General Plan Development Alternative include the following: land use, transportation, air quality, biological resources, GHG emissions, hydrology, noise, public utilities, visual effects and neighborhood character, and wildfire.

The following issue areas that would result in less-than-significant impacts with or without mitigation under the proposed project, would be the same under the No Project/General Plan Development Alternative: energy, geologic conditions, health and safety, paleontological resources, historic resources, public service and facilities, tribal cultural resources, and water quality.

None of the impacts associated with this alternative would be reduced in comparison to the project.

Relationship to Project Objectives

The No Project/General Plan Development Alternative could meet project objective 4 (building design compatible with surrounding uses) and 5 (integrate into existing topography to reduce grading footprint). However, as this is an alternative and a design has not been proposed, it is unlikely that this alternative would fully meet project objectives 4 and 5. The No Project/General Plan Development Alternative does not meet project objectives 1 through 3, which are specific to development of a fire station. Overall, this alternative does not meet the project objectives as well as the project.

Feasibility

There is adequate infrastructure in the area for development of this alternative and it would be consistent with the General Plan land use designation for the site. Although this alternative would be consistent with the General Plan land use designation, the site may not be suitable for an industrial use given its location near existing residential neighborhoods and proximity to sensitive biological resources and wildfire hazards. A site plan and design features would be required to determine if the site is suitable for an industrial use, and such information is not available at this time. The site is controlled by the City; therefore, this would not preclude feasibility of developing the site. However, it is unknown if this alternative would be economically feasible. An economic analysis would be required

to determine if it would be feasible to implement an industrial use on the project site, and such information is not available.

9.5.3 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. Factors that need to be considered when identifying an off-site alternative includes 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.

The alternative site chosen for this analysis comprises three parcels (APNs 541-241-01-00; 540-495-01-00; 540-495-04-00) located near 4029/4070 Home Avenue, approximately one mile southwest of the project site. This site is designated Industrial Employment in the General Plan and zoned IL-2-1 and spans a total of 1.14 acres across the three undeveloped parcels. This site was originally preferred for the new fire station because of the large size of the combined lots, which would presumably allow for design flexibility, including multiple options for ingress/egress. The site is located at the base of a canyon surrounded by single-family homes higher in elevation to the north, commercial and light industrial uses to the northeast and southwest along Home Avenue, and military housing apartments to the southeast. The fire station built at this alternative site location would remain 22,443 square feet and would cover a minimum of 0.59 acres.

Comparative Analysis of Environmental Effects

Land Use

Similar to the project, although implementation of the Site Location Alternative could deviate from the IL-2-1 zoning related to building height and retaining wall height, this alternative would not be required to request a deviation from the City's Municipal Code because the City has a process to exempt all public facilities, such as a fire station, from zoning regulations when the findings can be made consistent with Administrative Regulation (AR) 1.60. This alternative would not divide an established community, as the project site does not serve to connect two areas, same as the project.

Similar to the project, this alternative would be consistent with the City's CAP. Further, this alternative would be consistent with the General Plan's Conservation Element, as this alternative would include the same sustainability features as the project and would not conflict with the applicable strategies of the City's CAP per General Plan Policy CE-A.5. This alternative would be consistent with the General Plan's Noise Element as this alternative would be required to comply with applicable existing local and state noise regulations per General Plan Policy NE-A.1 or implement mitigation measures to comply with existing noise regulations to be consistent with the General Plan's Noise

Element. Similar to the project, this alternative would be consistent with the General Plan's Historic Preservation Element with implementation of **MM-HIST-1**, which requires an Archaeological and Native American monitoring program, consistent with General Plan Policy HP-A.4. Similar to the project, although this alternative is located within the Airport Influence Area for the San Diego International Airport – Review Area 2 of the San Diego International ALUCP, this alternative would not conflict with the San Diego International Airport's ALUCP. As this alternative site has not been surveyed for biological resources, this alternative could conflict with the provisions of the City's MSCP Subarea Plan or other approved local, regional, or state habitat conservation plan. Overall, this alternative could result in an increase in land use impacts.

Transportation/Circulation

Similar to the project, this alternative would not result in inadequate emergency access or create hazardous design features. For any encroachment into the public right-of-way including sidewalks, parking spaces, medians during construction, a traffic control plan/permit would be required to be prepared and submitted to the City. For any lane closures or sidewalk closures during construction, a traffic control plan would be prepared. Development under this alternative would be required to be designed and constructed per applicable City design standards and comply with emergency access requirements of the SDFD and the City. Impacts associated with inadequate emergency access and hazardous design would be less than significant, similar to the proposed project. This alternative would also be consistent with plans, policies, and regulations related to the transportation system, similar to the proposed project.

Per screening criteria included in the City's TSM, a local serving public facility (such as transit centers, public schools, libraries, post offices, park-and-ride lots, police and fire facilities, and government offices) are presumed to have a less-than-significant VMT impact. Under the Site Location Alternative, a fire station and is considered a local serving public facility/service. Therefore, the project's VMT impacts would be less than significant. Since this alternative would still develop a fire station, the VMT impact would remain less than significant. Therefore, the Site Location Alternative impacts associated with transportation/circulation would be the same as the project.

Air Quality and Odor

Under this alternative, the fire station building would have the same SF as the proposed project but could cover more than 0.59 acres and result in increased ground disturbance due to the topography of the site that slopes upwards towards the west from Home Avenue. As discussed below under Health and Safety, the site was reportedly used as a burn dump resulting in residual heavy metal soil impacts typically found in burn ash and soil remediation would be required which could result in significant soil disturbance and construction activity. Therefore, criteria air pollutant emissions

would be increased in comparison to the project, due to potential increased ground disturbance. Similar to the project, the construction emissions could result in a potential Maximum Individual Cancer Risk at nearby residential receptors that would exceed the 10 in a million cancer risk threshold. If a potentially significant impact in regard to cancer risk resulting from TAC emissions generated during construction (**Impact Issue 4**) occurred, it would be reduced same as the project. Similar to the project, **MM-AQ-1**, which requires the use of CARB-certified Tier 4 final off-road equipment during construction, would be implemented under this alternative to reduce exhaust PM₁₀ (DPM) emissions. Implementation of **MM-AQ-1** would reduce the impact to less than significant. Construction emissions are anticipated to be below the Chronic Hazard Index threshold, similar to the project.

Once operational, this alternative would result in the same amount of criteria air pollutants as the project since this alternative would not change operation of the fire station. The mobile source emission generators, area source emission generators, and energy use would remain the same as the project during operations. Similar to the project, impacts associated with odors during construction and operation would be less than significant. Overall, this alternative could result in a potentially significant increase in air quality impacts due to construction activities require for site remediation as compared to the project.

Biological Resources

As this alternative site has not been surveyed for biological resources, the site could contain vegetation communities, special-status plants and wildlife, and jurisdictional wetlands. Therefore, this alternative has the potential to result in potentially significant direct and indirect impacts to vegetation communities, special-status plants and wildlife, and jurisdictional wetlands. Mitigation measures and/or avoidance measures would be implemented to reduce these impacts; however, since the site has not been surveyed for biological resources, it is impossible to know at this time if implementation of mitigation measures would reduce the potentially significant impacts to a level of less than significant.

This alternative site is not within the designated MHPA and is not located within a designated key biological core and linkage area, as noted in the City's MSCP Subarea Plan (City of San Diego 1997). Additionally, this alternative site is not adjacent to MHPA lands. Therefore, this alternative would result in less-than-significant direct and indirect impacts to wildlife movement, corridors, habitat linkages, or nursery sites, similar to the project. As discussed previously, as this alternative site has not been surveyed for biological resources, the site could contain vegetation communities, special-status plants and wildlife, and jurisdictional wetlands and impacts to these biological resources could be potentially significant. Therefore, this alternative could conflict with provisions of the MCSP or local policies or ordinances protecting biological resources outlined in the City's ESL Regulations

and Biology Guidelines. Similar to the project, any landscaping that would be done under this alternative would be required to comply with the City's Landscape Regulations and be non-invasive. Overall, this alternative would result in an increase in severity of biological resource impacts as compared to the project.

Energy

Similar to the project, this alternative would increase electricity, natural gas, and petroleum use during construction and operation as a result of developing a currently undeveloped site. Energy consumption associated with construction and operation of this alternative would be similar to the project as this alternative would develop a building with the same SF as the project. Therefore, the same as the project, energy consumption would not be inefficient or wasteful.

As this alternative would be required to comply with Title 24, Part 6 and Part 11 of the California Building Code, it would be consistent with the City's General Plan Conservation Element policies pertaining to energy use, and would comply with the six strategies included in the CAP designed to reduce unnecessary consumption of energy. No conflict with existing energy standards and regulations would occur. Therefore, energy impacts would be similar to the project.

Geologic Conditions

Similar to the project, with implementation of the recommendations and appropriate building design measures consistent with the California Building Code and City requirements, the risk of potential effects from geologic hazards would be reduced to an acceptable level of risk. 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 NPDES requirements, associated potential erosion and sedimentation impacts from implementation of this alternative would be less than significant, the same as the project.

Greenhouse Gas Emissions

Under this alternative, construction GHG emissions could increase in comparison to the project as this alternative could require more ground disturbance and, thus, the use of more construction equipment, see discussion above under Air Quality. Operational GHG emissions would be the same as the project since the same building SF would be developed, and the same amount of trips would be generated. Similar to the project, the alternative's significance would be evaluated per the Memorandum, Climate Action Plan Consistency for Plan- and Policy-Level Documents and Public Infrastructure Projects as this alternative would develop a fire station, which is a public infrastructure project. As the fire station built under this alternative would have a similar design to the project, it is assumed that this alternative would be consistent with and would not conflict with

the six applicable strategies of the City's CAP. Overall, this alternative could result in an increase in GHG emissions as compared to the project.

Health and Safety

The site associated with the Site Location Alternative is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and a significant hazard to the public or environment could result. The site was reportedly used as a burn dump during the period from approximately 1908 to 1913, resulting in residual heavy metal soil impacts typically found in burn ash. In 2005, a Remedial Action Plan was approved with conditions; however, no additional reports were submitted after approval and no remediation has occurred. Use of this site for the Site Location Alternative would require remediation. As this site is included on a list of hazardous materials sites and remediation has not occurred, in comparison to the proposed project, this alternative would result in an increased severity in health and safety impacts.

This alternative is located within approximately 515 feet of an elementary school located to the northwest. Similar to the project, any hazardous materials utilized during construction or operation would be transported, stored, 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. The development of 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, same as the project.

The Site Location Alternative is located within the San Diego Airport Influence Area (San Diego International Airport – Review Area 2), Airport Land Use Compatibility Overlay Zone. ALUC review is required for land use plans and regulations within Review Area 2 that propose buildings or uses that exceed the 200-foot height limit and for land use projects that; have received from the FAA a Notice of Presumed Hazard, a Determination of Hazard or a Determination of No Hazard subject to conditions, limitations or marking and lighting requirements, and/or would create glare, lighting, electromagnetic interference, dust, water vapor, smoke, thermal plumes, and bird attractant hazards. The development proposed under this alternative would be subject to airport land use compatibility or ALUC review if it exceeds 200 feet or has received a FAA notice for one of the reasons listed above and is not anticipated to result in a safety hazard for people working in a designated airport influence area. Furthermore, because the project site is located outside any designated noise contours or Safety Zones associated with the San Diego International Airport, the project is not expected to pose additional risks to fire station employees related to airport operations.

Overall, this alternative would result in an increase in severity of health and safety impacts as compared to the project.

Hydrology

Similar to the project, this alternative would include development of a largely undeveloped site, increasing the amount of impervious surfaces within the site; thereby, increasing the quantity of stormwater runoff, alteration of the regional drainage pattern, flooding, and reduction in onsite groundwater recharge. However, the same as the project, this alternative would be required to include drainage control improvements that retain/detain peak stormwater flows onsite to ensure no increase in stormwater flows relative to existing conditions.

This alternative site location is not within a 100-year or 500-year flood zone. Similar to the project, the proposed development under this alternative would not impose flood hazards on other properties or be developed within a 100-year floodplain. Further, implementation of this alternative would require conformance with federal, state, and local regulations related to hydrology and drainage, the same as the project. As such, this alternative would not result in increased runoff or have an adverse effect on drainage patterns, similar to the project. Hydrology impacts associated with this alternative would be less than significant, the same as the project.

Noise

Under this alternative, construction noise and vibration could increase in comparison to the project as this alternative would require more ground disturbance for remediation and, thus, the use of more construction equipment leading to a longer construction schedule and an increase in construction noise and vibration. Residences are located across Home Avenue to the south and southwest and also to the north. If temporary construction exceeds 75 dBA L_{eq} at a residentially zoned receptor, it would be considered significant. If a construction noise impact would occur, it is presumed that mitigation measures would be implemented to reduce the alternative's construction noise impact to a level of less than significant.

Regarding operation, off-site roadway traffic noise would remain the same in comparison to the project, due to operation of the fire station and vehicle trips not changing under this alternative. Noise levels generated by operation of the fire station would be the same as the project, as the predicted noise level from the heating, ventilation, and air conditioning (HVAC) equipment units would be no more than 33 dBA L_{eq} , and would thus be compliant with the City's daytime threshold of 50 dBA L_{eq} and nighttime threshold of 40 dBA hourly L_{eq} . No operational vibration impacts are anticipated to occur with development of this alternative, same as the project.

The Site Location Alternation is not located within the MHPA or adjacent to MHPA areas (City of San Diego 1997). However, similar to the project, once construction of the alternative is complete, the alternative would not be expected to produce noise at levels that could indirectly impact MSCP covered and special-status species.

Similar to the project, the site is not located within an Airport Environs Overlay Zone and is not within a 60 dBA CNEL contour and would not subject future fire station employees to noise levels associated with an airport to above 65 dBA CNEL levels. Overall, this alternative could result in an increase in noise impacts as compared to the project.

Paleontological Resources

The Site Location Alternative site could be underlain with formations that have a moderate- to high-resource potential for the occurrence of sensitive paleontological resources. As the alternative site has not been surveyed for paleontological resources, the underlying formations could contain sensitive paleontological resources.

As this alternative would develop the site, the potential exists for scientifically significant paleontological resources to be unearthed given the underlying paleontologically sensitive deposits and depth of potential construction-related excavation activities needed to develop this alternative. Similar to the project, this alternative would be subject to compliance with the City's grading ordinance (SDMC Section 142.0151). If proposed grading exceeds applicable thresholds, the requirement for paleontological monitoring would be made a condition of approval for the alternative. Additionally, the project would be required to comply with the City's Paleontological Guidelines identified in Appendix P of the Land Development Manual. Paleontological monitoring conducted in accordance with the Municipal Code and Appendix P of the Land Development Manual would ensure no significant impact would occur. Thus, it is anticipated this alternative would have a less-than-significant impact, the same as the project.

Historical Resources

The Site Location Alternative site could be in close proximity to or underlain with historical resources as surveying for historical resources has not been done. Thus, the potential exists for unknown buried archeological and Native American resources to occur during construction of the alternative.

As this alternative would develop the site, the potential exists for unknown buried archeological and Native American resources to be unearthed during ground disturbance associated with construction. Similar to the project, this alternative would be required to implement **MM-HIST-1** to ensure impacts to historical resources are reduced to a level below significance. Thus, this alternative would have less-than-significant impacts with mitigation incorporated, the same as the project.

Public Services and Facilities

The Site Location Alternative would include the construction of a fire station and would not introduce new dwelling units or increase the population base within the fire protection service area, similar to the project. Thus, this alternative would not generate additional demand for fire protection and emergency services within the specified service area beyond what is currently anticipated. The existing police facilities would continue to serve the project site, and this alternative would not result in the need for new or expanded police station facilities in order to maintain acceptable service ratios, response times, or other performance objectives, similar to the project. This alternative would not introduce a new population base that would require parks and other recreation facilities or contribute to an increase in demand for new educational/library facilities or the expansion of existing ones. Thus, impacts associated with Site Location Alternative would be less than significant, the same as the project.

Public Utilities

Water

In accordance with the City's Design Guidelines and Standards, the water demands for this alternative would be developed and a Sewer and Water study would be prepared. As this alternative would develop a fire station with the same SF as the project, it is anticipated that this alternative's maximum annual water demand would be the same as the project and would align with the City's forecasted water demand and would not require compliance with SB 610. Since this alternative is located at a different site, the existing water infrastructure at the site is unknown and could require on- and off-site water connections that could result in direct impacts from the construction of new or expanded public utilities needed to serve this alternative. Therefore, the need for water infrastructure could be increased under the Site Location Alternative in comparison to the project.

Wastewater

The wastewater or sewer generation for this alternative would be required to be developed in accordance with the City's Sewer Design Guide. Since this alternative is located at a different site, existing sanitary sewer lines and associated infrastructure at the site are unknown and could result in new points of connection that would result in direct impacts from the construction of new or expanded public utilities needed to serve this alternative. Therefore, wastewater impacts could be increased under the Site Location Alternative in comparison to the project.

Solid Waste

The majority of waste generated during grading and construction would consist of export soil. The Site Location Alternative would develop the same SF as the project and would require the same amount of grading and ground disturbance as the project. Similar to the project, this alternative would be required to comply with the C&D Debris Deposit Ordinance by submitting a Waste Management Form with the building permit application demonstrating that at least 75% of the waste generated during project construction would be recycled. Thus, this alternative would result in similar construction solid waste impacts as the project.

Solid waste generated during operation of the project would be the same as the project since a fire station with the same building SF would be developed. Similar to the project, it is assumed that this alternative's trash enclosure would provide an organic waste storage area and recyclable material storage area that would accommodate trash and recycling facilities in compliance with the Refuse, Organic Waste, and Recyclable Material Storage Regulations. Additionally, this alternative would also comply with the City's General Plan waste management policies (PF-I.1. and PF-I.2.), in relation to providing efficient waste collection services and maximizing waste reduction. Overall, solid waste impacts associated with this alternative would be similar to the project.

Water Conservation

This alternative would be required to incorporate water sustainable design features, techniques, and materials that would reduce water consumption, as required by the California Building Code. Landscaping would be required to include drought-tolerant native vegetation and low water use plants that has been designed in accordance with the City's Land Development Manual, Landscape Standards, and other applicable city and regional standards. As this alternative would be required to be consistent with applicable water conservation requirements, impacts would be less than significant, same as the project.

Overall, public utilities impacts could be increased under this alternative.

Tribal Cultural Resources

The Site Location Alternative site could be in close proximity to or underlain with unknown tribal cultural resources and Native American resources as surveying for tribal cultural resources has not been done. As such, any ground disturbing construction activities have the potential to impact unknown tribal cultural resources and Native American resources.

As this alternative would develop the project site, the potential exists for unknown tribal cultural resources and Native American resources to be disturbed during ground disturbance associated with construction. Similar to the project, this alternative would be required to implement **MM-HIST-1**

to ensure that impacts to tribal cultural resources are reduced to a level below significance. Thus, this alternative would have less-than-significant impacts with mitigation incorporated, the same as the project.

Visual Effect and Neighborhood Character

Visual impacts could be increased in comparison to the project, as this alternative could require a larger building footprint and would be more visible to adjacent development. As this alternative site is undeveloped and does not itself feature designated public trails or view corridors, implementation of this alternative would not impact a significant public view from a hillside area. However, it would be visible from residences located on a hillside above the site. This alternative would be designed to integrate into and complement the existing topography of the site, consistent with General Plan Policy UD-A.3. Similar to the project, this alternative could exceed the allowable height regulations depending on the project design at this alternative location. However, the city exempts all public services, such as a fire station, from complying with zoning regulations. Similar to the project, this alternative would be required to comply with the City's design guidelines and would not result in bulk, scale, materials, or style that would be incompatible with surrounding development or result in a negative site aesthetic. Proposed lighting on-site would be required to comply with the City's Municipal Code, the same as the project. Overall, this alternative could result in a slight increase in visual effects and neighborhood character impacts.

Water Quality

This alternative would be required to comply with the NPDES permit program similar to the project, during construction. Under the NPDES permit program, BMPs are mandated for construction sites in which grading would be greater than 1 acre, through preparation of SWPPPs in order to reduce the occurrence of pollutants in surface water. Temporary construction BMPs would typically include street sweeping, waste disposal, vehicle and equipment maintenance, concrete washout area, 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 this alternative, would ensure that short-term impacts from construction-related activities would not violate any water quality standards or Water Discharge Requirements (WDRs) and not further contribute to water quality impacts identified in the CWA Section 303(d) List of Water Quality Limited Segments.

During operation, similar to the project, specific site design, source control, and treatment control BMPs, Low Impact Development practices, and project design measures would be implemented by

this alternative in accordance with regulations to ensure proposed water quality would not degrade further beyond existing conditions. Moreover, drainage flow volumes would remain the same as under existing conditions or would decrease following project implementation. Therefore, 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 generally be the same as the project under this alternative.

Wildfire

The site is not designated as a Very High FHSZ according to CAL FIRE; however, the site and the areas immediately surrounding the project site are mapped as a Very High FHSZ according to City maps. As such, construction and operation of this alternative could result in increased exposure of people and structures to wildland fire and exacerbate wildfire risk. Similar to the project, the alternative would be required to include project features for development in wildland urban interface areas to minimize structural ignitions. The installation and maintenance of associated infrastructure could introduce new ignition sources into a fire hazard area and exacerbate wildfire risk.

Similar to the proposed project, this alternative would not impair implementation of, or physically interfere with an adopted emergency response or evacuation plan and the alternative would comply with applicable state and City development standards associated with fire hazards and prevention, including any alternative compliance measures.

Overall, this alternative could result in a slight increase in the severity of wildfire impacts.

Impact Summary

The issue areas that would result in less-than-significant impacts with or without mitigation under the proposed project that could result in a slight increase in severity under the Site Location Alternative include the following: land use, air quality and odor, biological resources, greenhouse gases, health and safety, noise, public utilities, visual effect and neighborhood character, and wildfire.

The following issue areas that would result in less-than-significant impacts with or without mitigation under the proposed project, would be the same under the Site Location Alternative: transportation/circulation, energy, geologic conditions, hydrology, paleontological resources, historical resources, public services and facilities, tribal cultural resources, and water quality.

None of the impacts associated with this alternative would be reduced in comparison to the project.

Relationship to Project Objectives

The Site Location Alternative would meet project objective 1 (construction of a new fire station.) The Site Location Alternative could meet project objectives 2, (7 minute and 30 second response time), 4 (building design compatible with surrounding uses), and 5 (integrate into existing topography to reduce grading footprint). However, as this is an alternative and a design has not been proposed, it is unlikely that this alternative would fully meet project objectives 2, 4, and 5. The Site Location Alternative does not meet project objective 3, which calls for a site free of constraints including toxic contaminants. Overall, this alternative does not meet the project objectives as well as the project.

Feasibility

The site is not suitable for a new fire station as it is included on a list of hazardous sites and would require remediation for the fire station to be constructed which can be a very costly, lengthy, and result in environmental effects. Development of the site would be infeasible without remediation. It is unknown if this site contains any special-status habitat or species that may require additional mitigation or if available infrastructure to support a new fire station is present because such information is not available at this time. The site is not controlled by the City and valuation of the site came in low when the City considered purchasing the site. Purchase of the site, and thus this alternative, would not be economically feasible.

9.5.4 REDUCED FOOTPRINT ALTERNATIVE

The Reduced Footprint Alternative assumes that the project would be developed with a 5-story building rather than a 4-story building to reduce the overall project footprint and area of ground disturbance. The 22,443 SF of the fire station would not change including the uses per floor, but the SF would be divided amongst 5 stories so that the building footprint and overall lot coverage would be reduced. This alternative would result in less impervious surface area, would reduce disturbance to biological resources including the coastal sage scrub natural community and California gnatcatcher habitat, and would reduce potential impacts resulting from ground disturbance such as soil erosion and damage to cultural resources and paleontological resources. The offsite construction staging area would also be included and would not change from the project.

Comparative Analysis of Environmental Effects

Land Use

Similar to the project, although implementation of the Reduced Footprint Alternative would deviate from the RS-1-7 zoning related to building height and retaining wall height, this alternative would not be required to request a deviation from the City's Municipal Code because the City exempts all public

services, such as a fire station, from zoning regulations. This alternative would not divide an established community as the project site does not serve to connect two areas, same as the project.

Similar to the project, this alternative would be consistent with the City's CAP. Further, this alternative would be consistent with the General Plan's Conservation Element, as this alternative would include the same sustainability features as the project and would not conflict with the applicable strategies of the City's CAP per General Plan Policy CE-A.5. This alternative would be consistent with the General Plan's Noise Element as this alternative would not result in any substantial noise impacts and would comply with applicable existing local and state noise regulations per General Plan Policy NE-A.1, same as the project. This alternative would be consistent with the General Plan's Historic Preservation Element with implementation of **MM-HIST-1**, which requires an Archaeological and Native American monitoring program, consistent with General Plan Policy HP-A.4, same as the project. Similar to the project, although this alternative is located within the Airport Influence Area for the San Diego International Airport – Review Area 2 of the San Diego International ALUCP, this alternative would not conflict with the San Diego International Airport's ALUCP. Lastly, similar to the project, this alternative would not result in a conflict with the provisions of the City's MSCP Subarea Plan or other approved local, regional, or state habitat conservation plan with implementation of **AM-BIO-1a**, **AM-BIO-1c**, **AM-BIO-2**, and **MM-BIO-3**. Overall, the Reduced Footprint Alternative impacts associated with land use would be the same as the project.

Transportation/Circulation

Similar to the project, this alternative would not result in inadequate emergency access or create hazardous design features. For any encroachment into the public right-of-way including sidewalks, parking spaces, medians during construction, a traffic control plan/permit would be required to be prepared and submitted to the City. For any lane closures or sidewalk closures during construction, a traffic control plan would be prepared. Development under this alternative would be required to be designed and constructed per applicable City design standards and comply with emergency access requirements of the SDFD and the City. Impacts associated with inadequate emergency access and hazardous design would be less than significant, similar to the proposed project. This alternative would also be consistent with plans, policies, and regulations related to the transportation system, similar to the project.

Per screening criteria included in the City's TSM, a local serving public facility (such as transit centers, public schools, libraries, post offices, park-and-ride lots, police and fire facilities, and government offices) are presumed to have a less-than-significant VMT impact. Under the Reduced Footprint Alternative, the project would remain a fire station and is considered a local serving public facility/service. Therefore, the project's VMT impacts would be less than significant. Since this alternative would still develop a fire station, the VMT impact would remain less than significant.

Therefore, the Reduced Footprint Alternative impacts associated with transportation/circulation would be the same as the project.

Air Quality and Odor

It was determined that the project would result in a potentially significant impact to sensitive receptors in regard to cancer risk resulting from TAC emissions generated during construction, requiring the implementation of mitigation measure **MM-AQ-1**, which requires the use of CARB-certified Tier 4 final off-road equipment during construction. All other impacts related to air quality were determined to be less than significant.

Under this alternative, criteria air pollutant emissions could be reduced as compared to the project, due to the reduced footprint and area of ground disturbance under this alternative. Although construction activity would occur under this alternative, it could occur to a lesser extent than required by the project, due to the reduced building footprint to be constructed. Thus, construction emissions would be slightly decreased in comparison to the project. Similar to the project, the construction emissions could result in a potential Maximum Individual Cancer Risk at the nearby residential receptor that would exceed the 10 in a million cancer risk threshold. Since this alternative would involve less grading as the building footprint is reduced, a potentially significant impact in regard to cancer risk resulting from TAC emissions generated during construction (**Impact Issue 4**) could be reduced, the same as the project. **MM-AQ-1**, which requires the use of CARB-certified Tier 4 final off-road equipment during construction, would be implemented under this alternative to reduce exhaust PM₁₀ (DPM) emissions. Implementation of **MM-AQ-1** would reduce the impact to less than significant. Construction emissions would be below the Chronic Hazard Index threshold, similar to the project.

Once operational, this alternative would result in the same amount of criteria air pollutants as the project since this alternative would not change operation of the fire station. The mobile source emission generators, area source emission generators, and energy use would remain the same as the project during operations. Similar to the project, impacts associated with odors during construction and operation would be less than significant. Overall, this alternative could result in a slight decrease in air quality impacts as compared to the project.

Biological Resources

Biological resource impacts would be reduced under this alternative, as this alternative would reduce overall lot coverage and the building footprint. Similar to the project, this alternative would still result in potentially significant direct impacts to sensitive vegetation communities and special status wildlife and potentially indirect impacts to vegetation communities, special status plants, and special status wildlife (**Impact Issues 1 and 2**). However, as this alternative would have a slightly

reduced footprint as compared to the project, this alternative would slightly reduce, but not eliminate impacts to biological resources. This alternative would similarly implement **MM-BIO-1**, which includes a payment to the City's Habitat Acquisition Fund or deduction of credits from the Marron Valley Cornerstone Land Bank, which occurs inside the MHPA, **MM-BIO-2**, which requires pre-construction surveys to identify the presence of Crotch's bumble bee and/or nest colonies and other requirements if Crotch's bumble bee is present at the site, and **MM-BIO-3**, which requires that MHPA boundaries and the requirements regarding the least Bell's vireo and southwestern willow flycatcher are shown on the construction plans prior to the issuance of a grading permit. Additionally, this alternative would similarly implement **AM-BIO-1a** through **AM-BIO-1c**, which include standard permit measures that would be taken prior to construction, during construction, and post-construction to protect vegetation communities and special-status plants and wildlife, **AM-BIO-2**, which would implement LUAG compliance measures specific to the Coastal California gnatcatcher, and **AM-BIO-3**, which would revegetate the temporary disturbance of 0.039 acre of Diegan coastal sage scrub within the off-site construction staging area.

Similar to the project, this alternative would result in indirect impacts to adjacent jurisdictional resources that would be reduced to less than significant through implementation of avoidance and resource protection measures (**AM-BIO-1a** through **AM-BIO-1c**) and standard construction stormwater pollution prevention requirements (**Impact Issue 3**). This alternative would still result in less than significant indirect impacts to wildlife corridors or habitat linkages through compliance with the LUAG (**Impact Issue 4**), but the impacts would be reduced under this alternative. The project would not conflict with the provisions of the MSCP (**Impact Issue 5**) with implementation of **AM-BIO-1a**, **AM-BIO-1c**, **AM-BIO-2**, and **MM-BIO-3**, same as the project. As this alternative would occur on the same site as the project, this alternative would occur adjacent to the MHPA and is therefore required to document compliance with the MSCP LUAG to mitigate for potential adverse edge effects that would otherwise result in a potentially significant impact (**Impact Issue 6**). The project would be consistent with the City's ESL Regulations and Biology Guidelines (**Impact Issue 7**). All other direct and indirect impacts associated with biological resources would be less than significant. Impacts to biological resources would be reduced in comparison to the project.

Energy

Similar to the project, this alternative would increase electricity, natural gas, and petroleum use during construction and operation as a result of developing a currently undeveloped site. Energy consumption associated with construction and operation of this alternative would be similar to the project as this alternative would develop a building with the same SF as the project. Therefore, the same as the project, energy consumption would not be inefficient or wasteful.

As this alternative would be required to comply with Title 24, Part 6 and Part 11 of the California Building Code, it would be consistent with the City's General Plan Conservation Element policies pertaining to energy use and would comply with the six strategies included in the CAP designed to reduce unnecessary consumption of energy. No conflict with existing energy standards and regulations would occur. Therefore, energy impacts would be similar to the project.

Geologic Conditions

This alternative would be constructed on the same project site, with the same underlying geotechnical conditions. Therefore, similar to the project, with implementation of the recommendations and appropriate building design measures consistent with the California Building Code and City requirements, the risk of potential effects from geologic hazards would be reduced to an acceptable level of risk. 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 NPDES requirements, associated potential erosion and sedimentation impacts from implementation of this alternative would be less than significant. Further, as this alternative would require less ground disturbance, soil erosion would be reduced in comparison to the project. Overall, this alternative would result in reduced geologic conditions impacts.

Greenhouse Gas Emissions

Under this alternative, construction GHG emissions could be reduced as compared to the project, due to the reduced footprint and area of ground disturbance under this alternative. Although construction activity would occur under this alternative, it could occur to a lesser extent than required by the project, due to the reduced building footprint to be constructed. Thus, construction GHG emissions would be slightly decreased in comparison to the project. Operational GHG emissions would be the same as the project since the same building SF would be developed, and the same number of trips would be generated. Similar to the project, the alternative's significance would be evaluated per the Memorandum, Climate Action Plan Consistency for Plan- and Policy-Level Documents and Public Infrastructure Projects as this alternative would develop a fire station, which is a public infrastructure project. As the fire station built under this alternative would have a similar design to the project, it is assumed that this alternative would be consistent with and would not conflict with the six applicable strategies of the City's CAP. Overall, this alternative could result in a slight decrease in GHG emissions.

Health and Safety

This alternative would have the same potential risks associated with health and safety as the project, as it would be constructed on the same project site as the project. The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and a

significant hazard to the public or environment would not result. No existing structures/buildings or soil contamination containing hazardous materials would be disturbed by construction of this alternative. Any hazardous materials utilized during construction or operation would be transported, stored, 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. Lastly, the development of 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, same as the project. Impacts associated with health and safety would be the same as the project.

Hydrology

Similar to the project, this alternative would increase the impervious surfaces within the project site, thereby increasing the quantity of runoff on site, alteration of the regional drainage pattern, flooding, and reduction in onsite groundwater recharge. However, as ground disturbance would be reduced under this alternative, this alternative would result in less impervious surfaces. Similar to the project, this alternative would be required to include drainage control improvements that retain/detain peak stormwater flows onsite. Similar to the project, the proposed development under this alternative would not impose flood hazards on other properties or be developed within a 100-year floodplain. Further, implementation of this alternative would require conformance with federal, State, and local regulations related to hydrology and drainage. As such, this alternative would not result in increased runoff or have an adverse effect on drainage patterns, similar to the project. Hydrology impacts associated with this alternative would be less than significant the same as the project. Overall, this alternative would result in a slight reduction in hydrology impacts.

Noise

Noise associated with project construction under this alternative would be similar compared to the project because similar construction activities and a similar construction schedule would be implemented. However, this alternative would reduce the area of ground disturbance. Thus, construction noise generated by this alternative could be reduced. Same as the project, noise associated with construction activities would not have the potential to exceed the City's 12-hour average noise standard of 75 dBA and groundborne construction vibration would be no greater than the annoyance threshold recommended by Caltrans.

Regarding operation, off-site roadway traffic noise would remain the same in comparison to the project, due to operation of the fire station and vehicle trips not changing under this alternative. Noise levels generated by operation of the fire station would be the same as the project, as the

predicted noise level from the (HVAC equipment units would be no more than 33 dBA L_{eq} , and would thus be compliant with the City's daytime threshold of 50 dBA L_{eq} and nighttime threshold of 40 dBA hourly L_{eq} . No operational vibration impacts are anticipated to occur with development of this alternative, same as the project. Thus, construction and operational noise and vibration impacts would be less than significant, the same when compared to the project albeit construction noise could be slightly reduced due to the reduced area of ground disturbance.

Similar to the project, this alternative would be required to demonstrate compliance with the City's MSCP LUAG, which would provide a further reduction in indirect noise impacts to biological resources within the MHPA during construction of the project. Long-term operational noise, which would be the same as the project, would be minimal and would not substantially change overall noise levels within the MHPA adjacent to the project site.

Similar to the project, the site is not located within an Airport Environs Overlay Zone and is not within a 60 dBA CNEL contour and would not subject future fire station employees to noise levels associated with an airport to above 65 dBA CNEL levels. Overall, this alternative could result slightly decreased noise impacts.

Paleontological Resources

As discussed in Section 5.11, Paleontological Resources, the project site is underlain with formations that have a moderate- to high-resource potential for the occurrence of sensitive paleontological resources. This alternative would have a slightly reduced footprint compared to the project, and therefore would slightly reduce, but not eliminate impacts to potential on-site paleontological resources. Similar to the project, given the underlying paleontologically sensitive deposits and depth of proposed construction-related excavation activities, the potential exists for scientifically significant paleontological resources to be unearthed. Similar to the project, this alternative would be subject to compliance with the City's grading ordinance (SDMC Section 142.0151) and if proposed grading exceeds applicable thresholds, the requirement for paleontological monitoring would be made a condition of approval for the alternative. Additionally, the project would be required to comply with the City's Paleontological Guidelines identified in Appendix P of the Land Development Manual. Paleontological monitoring conducted in accordance with the Municipal Code and Appendix P of the Land Development Manual would ensure no significant impact would occur. Thus, impacts would be less than significant, similar to the proposed project albeit slightly less due to the reduced footprint.

Historical Resources

As discussed in Section 5.12, Historical Resources, the project area of potential effects (project APE) is located within close proximity to Chollas Creek, which was used by local Native Americans as a

valuable source of resources and as a travel route, as a known village is located along the creek. Due to the project site's close proximity to Chollas Creek, the potential exists for unknown buried archeological and Native American resources to occur.

This alternative would have a slightly reduced footprint compared to the project, and therefore would slightly reduce, but not eliminate impacts to potential on-site historical resources. Impacts to on-site historical resources would be slightly reduced compared to the project, although mitigation would still be required. Similar to the project, this alternative would be required to implement **MM-HIST-1** to ensure that impacts are reduced to a level below significance. Thus, impacts would be less than significant with mitigation, similar to the proposed albeit slightly less due to the reduced footprint.

Public Services and Facilities

The Reduced Footprint Alternative would include the construction of a fire station and would not introduce new dwelling units or increase the population base within the fire protection service area, similar to the project. Thus, this alternative would not generate additional demand for fire protection and emergency services within the specified service area beyond what is currently anticipated. The existing police facilities would continue to serve the project site, and this alternative would not result in the need for new or expanded police station facilities in order to maintain acceptable service ratios, response times, or other performance objectives, similar to the project. This alternative would not introduce a new population base that would require parks and other recreation facilities or contribute to an increase in demand for new educational/library facilities or the expansion of existing ones. Thus, impacts associated with Reduced Footprint Alternative would be less than significant, the same as the project.

Public Utilities

Water

Under this alternative, a fire station would be built at the same project site and would generate the same water demand as the project. Thus, this alternative's maximum annual water demand would align with the City's forecasted water demand, would not require the construction of new or expanded public utilities needed to serve the project, and would not require compliance with SB 610. Similar to the project, this alternative would tie into the City's existing water main and water infrastructure would be designed and sized to meet the project's water needs in conformance with City standards. Therefore, the Reduced Footprint Alternative impacts associated with water would be less than significant, same as the project.

Wastewater

Under this alternative, a fire station would be built at the same project site. This alternative would connect to the same existing infrastructure via two new sewer lines as the project. This alternative would include a new point of connection to the existing sewer line but would not result in any modifications to the existing sewer system in the project vicinity, the same as the project. Therefore, the Reduced Footprint Alternative impacts associated with wastewater would be less than significant, same as the project.

Solid Waste

The majority of waste generated during grading and construction would consist of export soil. The Reduced Footprint Alternative would require less grading and ground disturbance, which would result in a decreased net soil export. Similar to the project, this alternative would be required to comply with the C&D Debris Deposit Ordinance by submitting a Waste Management Form with the building permit application demonstrating that at least 75% of the waste generated during project construction would be recycled. Thus, this alternative would result in reduced construction solid waste impacts.

Solid waste generated during operation of the project would be the same as the project since a fire station with the same building SF would be developed. Similar to the project, it is assumed that this alternative's trash enclosure would provide an organic waste storage area and recyclable material storage area that would accommodate trash and recycling facilities in compliance with the Refuse, Organic Waste, and Recyclable Material Storage Regulations. Additionally, this alternative would also comply with the City's General Plan waste management policies (PF-I.1. and PF-I.2.), in relation to providing efficient waste collection services and maximizing waste reduction.

Overall, this alternative could result in a slight reduction in solid waste impacts in comparison to the project.

Water Conservation

Under this alternative, a fire station would be built at the same project site and would incorporate the same water sustainable design features, techniques, and materials that would reduce water consumption as the project, as required by the California Building Code. Similar to the project, landscaping would include drought-tolerant native vegetation and low water use plants that has been designed in accordance with the City's Land Development Manual, Landscape Standards, and other applicable city and regional standards. This alternative would be consistent with applicable water conservation requirements and impacts would be less than significant, same as the project.

Overall, impacts associated with public utilities would be the same under this alternative.

Tribal Cultural Resources

As discussed in Section 5.15, Tribal Cultural Resources, the project APE is located within close proximity to Chollas Creek, which was used by local Native Americans as a valuable source of resources and as a travel route. As such, any ground disturbing construction activities have the potential to impact unknown tribal cultural resources and Native American resources.

This alternative would have a slightly reduced footprint compared to the project, and therefore would slightly reduce, but not eliminate impacts to potential on-site tribal cultural resources. Similar to the project, there is the potential for tribal cultural resources to be impacted by implementation of this alternative. Impacts would be considered significant, similar to the project, and **MM-HIST-1** would be implemented to reduce impacts to a level below significance. Thus, impacts would be less than significant with mitigation, similar to the proposed albeit slightly less due to the reduced footprint.

Visual Effect and Neighborhood Character

Visual impacts would be similar to the project, as this alternative would be constructed within the same project site as the project and would require a similar amount of landform alterations as the project. Similar to the project, this alternative would exceed the allowable height regulations. However, the City has a process to exempt public services, such as a fire station, from complying with zoning regulations if conditions in Administrative Regulation 1.60 are met. Similar to the project, this alternative would not block any existing public views as none of the public views identified in the MCCP provide views of the project site and the General Plan does not identify a scenic vista or public view corridor in the project area. Similar to the project, this alternative would comply with the City's required design guidelines and would not result in bulk, scale, materials, or style that would be incompatible with surrounding development or result in a negative site aesthetic. Proposed lighting on-site would not change under this alternative and would comply with the City's Municipal Code, the same as the project. Impacts would be the same as the project under this alternative.

Water Quality

This alternative would be required to comply with the NPDES permit program similar to the project, during construction. Under the NPDES permit program, BMPs are mandated for construction sites in which grading would be greater than 1 acre, through preparation of SWPPPs in order to reduce the occurrence of pollutants in surface water. Temporary construction BMPs would typically include street sweeping, waste disposal, vehicle and equipment maintenance, concrete washout area, 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 this alternative, would ensure that short-term impacts from construction-related activities would not violate any water quality standards or Water Discharge Requirements (WDRs) and not further contribute to water quality impacts identified in the CWA Section 303(d) List of Water Quality Limited Segments.

During operation, similar to the project, specific site design, source control, and treatment control BMPs, Low Impact Development practices, and project design measures would be implemented by this alternative in accordance with regulations to ensure proposed water quality would not degrade further beyond existing conditions. Moreover, drainage flow volumes would remain the same as under existing conditions or would decrease following project implementation. Therefore, 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 project under this alternative.

Wildfire

The site of this alternative is not designated as a Very High FHSZ according to CAL FIRE or City maps; however, the areas immediately surrounding the project site are mapped as a Very High FHSZ. As such, construction and operation of this alternative could result in increased exposure of people and structures to wildland fire and exacerbate wildfire risk. Similar to the project, the alternative would be required to include project features for development in wildland urban interface areas to minimize structural ignitions. The installation and maintenance of associated infrastructure could introduce new ignition sources into a fire hazard area and exacerbate wildfire risk.

Similar to the project, this alternative would not impair implementation of, or physically interfere with an adopted emergency response or evacuation plan and the alternative would comply with applicable state and City development standards associated with fire hazards and prevention, including any alternative compliance measures. Overall, the Reduced Footprint Alternative impacts associated with wildfire would be the same as the project.

Impact Summary

The issue areas that would result in less-than-significant impacts with or without mitigation under the proposed project that could result in a decrease in severity under the Reduced Footprint Alternative include the following: biological resources, air quality and odor, geologic conditions, greenhouse gas emissions, hydrology, noise, paleontological resources, historical resources, and tribal cultural resources.

The issue areas that would result in less-than-significant impacts with or without mitigation under the proposed project that would be the same under the Reduced Footprint Alternative include the following: land use, transportation/circulation, energy, health and safety, public services and facilities, public utilities, visual effects and neighborhood character, water quality, and wildfire.

None of the impacts associated with this alternative would be increased in comparison to the project.

Relationship to Project Objectives

The Reduced Footprint Alternative would meet most project objectives. As this alternative would reduce the footprint of the proposed fire station in comparison to the project, objective 5 would be met to a greater extent than the proposed project. However, a five-story station would likely lead to longer response times as there are more flights of stairs and/or fire poles for crews to navigate, leading to additional time to get to the fire apparatus and out the door. Further, more stairs and/or fire poles introduces additional safety hazards. With more stairs and fire poles to navigate, there is higher risk for injuries because crews need to move rapidly to get to the apparatus and out the door for emergency responses, including at night. If a crew member is injured while getting to the apparatus, the associated emergency response will be delayed. Thus, a 5-story design would have the potential for delayed emergency responses, and therefore would not meet objective 2. This alternative would not meet objective 4 to the same extent, as a 5-story building would result in exceeding local zoning standards to a greater degree as the proposed project. Overall, this alternative meets objectives 1, 3, and 5.

Feasibility

The site is considered suitable for the Reduced Footprint Alternative as the building SF and project components would remain the same. There is also adequate infrastructure in the area and the development would be fully in the control of the City with no jurisdictional concerns. The site proposed to be utilized by this alternative is controlled by the City, and therefore this would not preclude feasibility of developing the site. The design alterations needed to accommodate a 5-story building within a reduced footprint appear feasible, although it should be noted that this may incur additional engineering and/or construction costs. This alternative would increase the amount of time it takes for the fire crew to exit the building and respond to an emergency. The fire crew would likely not be able to respond to an emergency within 7 minutes and 30 seconds of dispatch receipt of the emergency call if the fire station building was five stories, since sleeping areas would be on the top floor to address design requirements. Further while the City may exempt public facilities that meet AR 1.60 from zoning height regulations, a taller building could nevertheless be out of the visual character of the surrounding area.

9.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

This analysis focuses on alternatives capable of avoiding or substantially lessening the environmental effects of the project, even if the alternatives would impede, to some degree, the attainment of project objectives.

The environmentally superior project would be the No Project/No Development Alternative as it would avoid all environmental impacts. However, it would also not achieve the basic project objectives. 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. The context of an environmentally superior alternative is based on consideration of several factors, including the proposed project's objectives and the ability to fulfill the goals while reducing potential impacts to the environment. Thus, the environmentally superior alternative, as identified in the analysis above, would be the Reduced Footprint Alternative.

The following issue areas that would be less than significant with or without mitigation under the proposed project, would be slightly reduced under the Reduced Footprint Alternative: biological resources, air quality and odor, geologic conditions, greenhouse gas emissions, hydrology, noise, paleontological resources, historical resources, and tribal cultural resources.

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**

Environmental Issue	Proposed Project	No Project/No Development Alternative	No Project/General Plan Development Alternative	Site Location Alternative	Reduced Footprint Alternative
<i>5.1 Land Use</i>					
Land Use (general)	LTS	NI▼	▲LTS	▲LTS	LTS (-)
<i>5.2 Transportation</i>					
Transportation (general)	LTS	NI▼	▲LTS	LTS (-)	LTS (-)
<i>5.3 Air Quality and Odor</i>					
Impact Issue 4: The proposed project could expose sensitive receptors to substantial pollutant concentrations and could result in a potentially significant impact.	LTS with MM-AQ-1	NI▼	▲LTS	▲LTS	LTS▼
<i>5.4 Biological Resources</i>					
Impact Issue 1 and Issue 2: The proposed project could result in potentially significant impacts to special-status wildlife	LTS with MM-BIO-1, MM-BIO-2, MM-BIO-3	NI▼	▲LTS	▲LTS	LTS▼
<i>5.5 Energy</i>					
Energy (general)	LTS	NI▼	LTS (-)	LTS (-)	LTS (-)
<i>5.6 Geologic Conditions</i>					
Geologic Conditions (general)	LTS	NI▼	LTS (-)	LTS (-)	LTS▼

Table 9-1.
Summary of Impacts for Each Alternative

Environmental Issue	Proposed Project	No Project/No Development Alternative	No Project/General Plan Development Alternative	Site Location Alternative	Reduced Footprint Alternative
<i>5.7 Greenhouse Gas Emissions</i>					
Greenhouse Gas Emissions (general)	LTS	NI ▼	▲ LTS	▲ LTS	LTS ▼
<i>5.8 Health and Safety</i>					
Health and Safety (general)	LTS	NI ▼	LTS (-)	▲ LTS	LTS (-)
<i>5.9 Hydrology</i>					
Hydrology (general)	LTS	NI ▼	▲ LTS	LTS (-)	LTS ▼
<i>5.10 Noise</i>					
Noise (general)	LTS	NI ▼	LTS (-)	▲ LTS	LTS ▼
<i>5.11 Paleontological Resources</i>					
Paleontological Resources (general)	LTS	NI ▼	LTS (-)	LTS (-)	LTS (-)
<i>5.12 Historic Resources</i>					
Impact Issue 1: The proposed project could uncover previously unknown archaeological and Native American resources, resulting in a potentially significant impact.	LTS with MM-HIST-1	NI ▼	LTS (-)	LTS (-)	LTS ▼

Table 9-1.
Summary of Impacts for Each Alternative

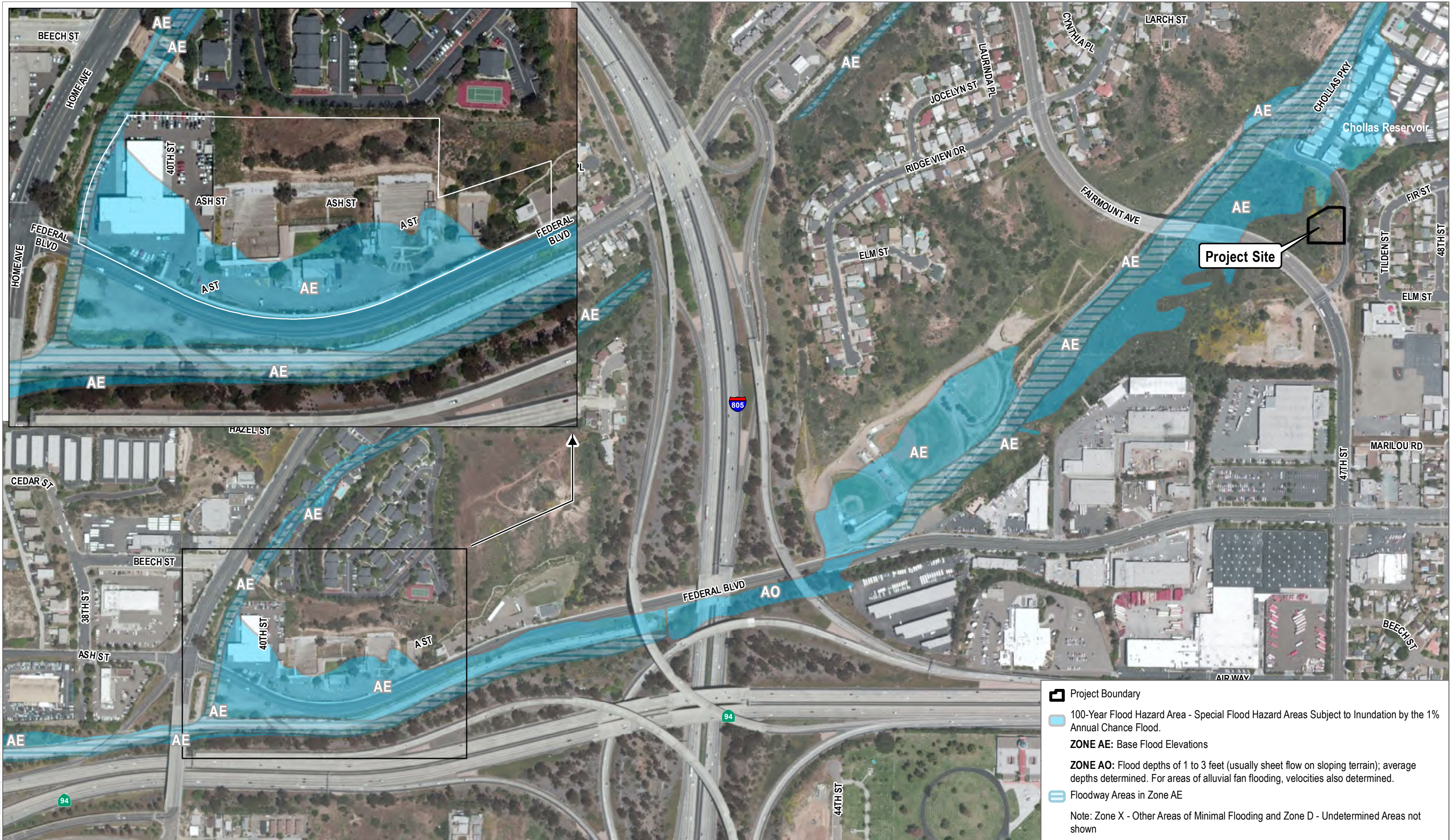
Environmental Issue	Proposed Project	No Project/No Development Alternative	No Project/General Plan Development Alternative	Site Location Alternative	Reduced Footprint Alternative
Impact Issue 3: In the event of an unanticipated discovery of human remains during construction, the project could result in potentially significant impact.	LTS with MM-HIST-1	NI▼	LTS (-)	LTS (-)	LTS▼
<i>5.13 Public Services and Facilities</i>					
Public Services and Facilities (general)	NI	NI▼	LTS (-)	LTS (-)	LTS (-)
<i>5.14 Public Utilities</i>					
Public Utilities (general)	LTS	NI▼	▲LTS	▲LTS	LTS (-)
<i>5.15 Tribal Cultural Resources</i>					
Impact Issue 1: The proposed project could result in potentially significant impacts to unanticipated resources, including TCRs.	LTS with MM-HIST-1	NI▼	LTS (-)	LTS (-)	LTS▼
<i>5.16 Visual Effect and Neighborhood Character</i>					
Visual Effect and Neighborhood Character (general)	LTS	NI▼	▲LTS	▲LTS	▲LTS
<i>5.17 Water Quality</i>					

**Table 9-1.
Summary of Impacts for Each Alternative**

Environmental Issue	Proposed Project	No Project/No Development Alternative	No Project/General Plan Development Alternative	Site Location Alternative	Reduced Footprint Alternative
Water Quality (general)	LTS	NI ▼	LTS (-)	LTS (-)	LTS (-)
<i>5.18 Wildfire</i>					
Wildfire (general)	LTS	NI ▼	▲ LTS	▲ LTS	LTS (-)
Meets Most of the Basic Project Objectives?	Yes	No	No	No	Yes (not to the same extent as the project)

Notes:

▲ Alternative is likely to result in greater impacts to issue when compared to proposed project.
 (-) Alternative is likely to result in similar impacts to issue when compared to proposed project.
 ▼ Alternative is likely to result in reduced impacts to issue when compared to proposed project.
 NI = No impact
 LTS = Less-than-significant impact
 SU = Significant and unavoidable impact
 MM = Mitigation Measure



SOURCE: RRM Design Group 2024; FEMA; CA Department of Water Resources; SANGIS 2023, 2024

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CHAPTER 10 MITIGATION MONITORING AND REPORTING

This chapter provides the Mitigation, Monitoring and Reporting Program (MMRP) for this EIR for the proposed Fairmount Avenue Fire Station Project (project). CEQA, Section 21081.6, requires that a mitigation monitoring and reporting program be adopted upon certification of an EIR to ensure that the mitigation measures are implemented. The mitigation monitoring and reporting program specifies what the mitigation is, the entity responsible for monitoring the program, and when in the process it should be accomplished. Public Resources Code section 21081.6 requires monitoring of only those impacts identified as significant or potentially significant. After analysis, potentially significant impacts requiring mitigation were identified for Air Quality, Biological Resources, and Historical Resources. The following is an overview of the mitigation monitoring and reporting program to be completed for the project.

MM-AQ-1 Require Use of Tier 4 Final Off-Road Equipment During Construction. Prior to the commencement of construction activities, the City shall require its construction contractor to demonstrate that all 50-horsepower or greater diesel-powered equipment is powered with California Air Resources Board (CARB)-certified Tier 4 Final or better engines.

In the event of changed circumstances (e.g., changes in the availability of specific types of construction equipment), the construction contractor may submit a request to the City of San Diego Environmental Designee (ED) to apply an equivalent method of achieving project-generated construction emissions that fall below the numeric cancer risk standards established by the San Diego Air Pollution Control District (SDAPCD). Documentation using industry-standard emission estimation methodologies shall be furnished to the City of San Diego ED demonstrating that estimated project-generated construction emissions would not exceed the applicable SDAPCD cancer risk threshold with the alternate construction method(s). If the documentation demonstrates that project-generated construction emissions will remain below the applicable SDAPCD cancer risk threshold, then the City of San Diego ED may approve the alternate construction method(s), at the Director's discretion. Required construction equipment fleet and methodologies approved by the City shall be included in the contract specifications for the construction contractor.

MM-BIO-1. Coastal Sage Scrub. To compensate for the loss of 0.495 acres of coastal sage scrub (including disturbed) and 0.006 -acre of mixed chaparral, mitigation would be provided through allocation of credits from the Marron Valley Cornerstone Land

Bank, which occurs inside the MHPA. Payment and credit allocation shall be provided for a total of 0.498 acres to achieve the required mitigation ratios prior to the start of construction (Table 5.4-6). The City of San Diego Engineering and Capital Projects Department (ECP) shall be required to contribute the estimated average per acre land cost, multiplied by the mitigation ratio plus any required amount for administration.

- MM-BIO-2. Crotch's Bumble Bee.** Prior to the Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, the City of San Diego (ED) shall verify the following project requirements regarding the Crotch's bumble bee are shown on the construction plans:
- A.** To avoid impacts to 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 removal of habitat in the proposed area of disturbance must occur during the colony active period, a Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of Crotch's bumble bee nesting within the proposed area of disturbance and follow the methodology developed consistent with the California Department of Fish Wildlife (CDFW) Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (CDFW 2023).
 - B.** A Qualified Biologist shall demonstrate the following qualifications: at least 40 hours of experience surveying for bee or other co-occurring aerial invertebrate species (such as Quino checkerspot butterfly) and who have completed a Crotch's bumble bee detection/identification training by an expert Crotch's bumble bee entomologist; or the biologist must have at least 20 hours of experience directly observing Crotch's bumble bee.
 - C.** The pre -survey shall be conducted by the Qualified Biologist within 30 calendar days prior to the start of construction activities (including removal of vegetation) and shall include a minimum of three (3) visits, a minimum of one (1) week apart.
 - D.** The Qualified Biologist/owner permittee shall submit the results of the pre-construction survey to City DSD (Mitigation Monitoring and Coordination), City Planning Department (MSCP) staff, and CDFW for review and written approval prior to initiating any construction activities.

- E.** If Crotch's bumble bees are determined to be present, then a photographic survey following CDFW guidance (i.e., CDFW Survey Considerations for CESA Candidate Bumble Bee Species) shall be required. If additional activities (e.g., capture or handling) are deemed necessary based on photographic surveys, then the Qualified Biologist shall obtain 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.
- F.** If preconstruction surveys identify active Crotch's bumble bee nest colonies, the Qualified Biologist shall notify CDFW in writing and establish, monitor, and maintain no-work buffers around the nest(s) and any associated floral resources. The size and configuration of the no-work buffer shall be based on best professional judgment of the Qualified Biologist in consultation with CDFW. At a minimum, the buffer shall provide at least 50 feet of clearance from construction activities around any nest entrances and maintain disturbance-free airspace between the nest and nearby floral resources. Construction activities shall not occur within the no work buffers until the colony is no longer active (i.e., no bees are seen flying in or out of the nest for three consecutive days indicating the colony has completed its nesting season and the next season's queens have dispersed from the colony).

MM-BIO-3. Avoidance of LBVI and SWFL Take. Prior to the issuance of a grading permit (or preconstruction meeting if a grading permit is not required), the City's (ED)/ Mitigation Monitoring Coordination staff (MMC) shall verify that Multi-Habitat Planning Area (MHPA) boundaries and the requirements regarding the least Bell's vireo and southwestern willow flycatcher, as specified below, are shown on the construction plans.

No clearing, grubbing, grading, or other construction activities shall occur during the least Bell's vireo breeding season (March 15 through September 15) or southwestern willow flycatcher habitat during the southwestern willow flycatcher breeding season (May 1 through September 1) until the following requirements have been met to the satisfaction of the ED/MMC:

- 1.** 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 decibels [dB(A)] hourly average for the presence of the least Bell's vireo and

southwestern willow flycatcher. Surveys for least Bell's vireo, shall be conducted pursuant to the protocol survey guidelines established by the USFWS within the breeding season prior to the commencement of any construction. If least Bell's vireo or southwestern willow flycatcher are present, then the following conditions must be met:

- a. March 15 through September 15 for least Bell's vireo, no clearing, grubbing, or grading of occupied habitat shall be permitted. May 1 through September 1 for southwestern willow flycatcher no clearing, grubbing, or grading through occupied habitat shall be permitted.
- b. Areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; and
- c. March 15 through September 15 for least Bell's vireo 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 habitat. May 1 through September 1 for southwestern willow flycatcher 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 habitat. An analysis showing that noise generated by construction activities shall not exceed 60 dB(A) hourly average at the edge of occupied habitat must be completed by a Qualified Acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the ED/MMC 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,
- d. At least 2 weeks prior to the commencement of construction activities, under the direction of a Qualified Acoustician, attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities would not exceed 60 dB(A) hourly average at the edge of habitat occupied by the least Bell's vireo or southwestern willow flycatcher. 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 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, construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (September 16 and September 2 for LBVI and SWFL, respectively). Construction noise monitoring 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 Qualified Biologist and the ED/MMC, 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.

2. If least Bell's vireo and southwestern willow flycatcher are not detected during the protocol surveys, the Qualified Biologist shall submit substantial evidence to the ED/MMC and applicable resource agencies that demonstrates whether or not mitigation measures such as noise walls are necessary from March 15 through September 15 for least Bell's vireo and May 1 through September 1 for southwestern willow flycatcher, adherence to the following is required:
 - a. If this evidence indicates that the potential is high for least Bell's vireo and southwestern willow flycatcher to be present based on historical records or site conditions, then Condition 1(a) shall be adhered to as specified above.
 - b. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

MM-HIST-1. Archaeological Resources

I. Prior to Permit Issuance or Bid Opening/Bid Award

- A. Entitlements Plan Check

1. Prior to permit issuance or Bid Opening/Bid Award, whichever is applicable, the City of San Diego (ED) shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.
- B. Letters of Qualification have been submitted to the City of San Diego ED
 1. Prior to the Bid Award, the applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the project's Principal Investigator (PI) and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and that all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.
 3. Prior to starting work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to the Start of Construction

- A. Verification of Records Search
 1. The PI shall provide verification to City of San Diego ED that a site-specific records search (quarter-mile radius) has been completed. Verification includes, but is not limited to, a copy of a confirmation letter from the South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
 3. The PI may submit a detailed letter to the City of San Diego ED requesting a reduction to the quarter-mile radius.
- B. PI Shall Attend Precon Meetings
 1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), and City of San Diego ED. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation-related Precon Meetings to make comments and/or suggestions concerning the

Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.

- a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with the City of San Diego ED, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. Acknowledgement of Responsibility for Curation (CIP or Other Public Projects)
The applicant shall submit a letter to the City of San Diego ED acknowledging their responsibility for the cost of curation associated with all phases of the archaeological monitoring program.
3. Identify Areas to be Monitored
 - a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to the City of San Diego ED identifying the areas to be monitored including the delineation of grading/excavation limits.
 - b. The AME shall be based on the results of a site-specific records search as well as information regarding the age of existing pipelines, laterals, and associated appurtenances and/or any known soil conditions (native or formation).
 - c. the City of San Diego ED shall notify the PI that the AME has been approved.
4. When Monitoring Will Occur
 - a. Prior to starting any work, the PI shall also submit a construction schedule to the City of San Diego ED through the RE indicating when and where monitoring will occur.
 - b. The PI may submit a detailed letter to the City of San Diego ED prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information, such as a review of final construction documents which indicate conditions such as the age of the existing pipe to be replaced, depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.
5. Approval of AME and Construction Schedule
After the City of San Diego ED approves the AME, the PI shall submit to the City of San Diego ED written authorization of the AME and Construction Schedule from the CM.

III. During Construction

- A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and the City of San Diego ED of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances, OSHA safety requirements may necessitate modification of the AME.
 2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and the City of San Diego ED. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop, and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.
 3. The PI may submit a detailed letter to the City of San Diego ED during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.
 4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CM shall fax the CSVRs to the RE on the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to the City of San Diego ED.
- B. Discovery Notification Process
1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil-disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.
 2. The Monitor shall immediately notify the PI (unless the Monitor is the PI) of the discovery.
 3. The PI shall immediately notify the City of San Diego ED by phone of the discovery and, if possible, submit written documentation by fax or email within 24 hours, with photos of the resource in context.
 4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance

1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow the protocol in Section IV below.
 - a. The PI shall immediately notify the City of San Diego ED by phone to discuss significance determination and shall also submit a letter to the City of San Diego ED indicating whether additional mitigation is required.
 - b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) and obtain written approval of the program from the City of San Diego ED, CM and RE. The ADRP and any mitigation must be approved by the City of San Diego ED, RE and/or CM before ground-disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also a historical resource as defined in CEQA Section 15064.5, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.
 - (1). Note: For pipeline trenching and other linear projects in the public Right-of-Way, the PI shall implement the Discovery Process for Pipeline Trenching projects identified below under “D.”
 - c. If the resource is not significant, the PI shall submit a letter to the City of San Diego ED indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.
 - (1). Note: For Pipeline Trenching and other linear projects in the public Right-of-Way, if the deposit is limited in size, both in length and depth; the information value is limited and is not associated with any other resources; and there are no unique features/artifacts associated with the deposit, the discovery should be considered not significant.
 - (2). Note, for Pipeline Trenching and other linear projects in the public Right-of-Way, if significance cannot be determined, the Final Monitoring Report and Site Record (DPR Form 523A/B) shall identify the discovery as Potentially Significant.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

- A. Notification
 - 1. The Archaeological Monitor shall notify the RE, City of San Diego ED, and the PI, if the Monitor is not qualified as a PI. The City of San Diego ED will notify the appropriate E&CP Environmental Designee to assist with the discovery notification process.
 - 2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.
- B. Isolate discovery site
 - 1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains.
 - 2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenience.
 - 3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.
- C. If Human Remains ARE determined to be Native American
 - 1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call.
 - 2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
 - 3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.
 - 4. The MLD will have 48 hours to make recommendations to the property owner or representative for the treatment or disposition with proper dignity of the human remains and associated grave goods.
 - 5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR;
 - b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with

appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN

- c. To protect these sites, the landowner shall do one or more of the following:
 - (1) Record the site with the NAHC;
 - (2) Record an open space or conservation easement; or
 - (3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.
- d. Upon the discovery of multiple Native American human remains during a ground-disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from a review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and items associated and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.

B. If Human Remains are NOT Native American

- 1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
- 2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).
- 3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for the internment of the human remains shall be made in consultation with the City of San Diego ED, ED, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract

- 1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
- 2. The following procedures shall be followed.
 - a. No Discoveries

In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSV and submit to City of San Diego ED via fax by 8 a.m. of the next business day.

b. Discoveries

All discoveries shall be processed and documented using the existing procedures detailed in Sections III – During Construction, and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.

c. Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III – During Construction and IV – Discovery of Human Remains shall be followed.

d. The PI shall immediately contact the RE and City of San Diego ED, or by 8 a.m. of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night and/or weekend work becomes necessary during the course of construction

1. The Construction Manager shall notify the RE at least 24 hours before the work is to begin.
2. The RE shall notify the City of San Diego ED immediately.

C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to the City of San Diego ED via the RE for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe as a result of delays with analysis, special study results or other complex issues, a schedule shall be submitted to the City of San Diego ED establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.
 - a. For significant archaeological resources encountered during monitoring, the Draft Monitoring Report shall include the Archaeological Data Recovery Program or Pipeline Trenching Discovery Process.
 - b. Recording Sites with State of California Department of Parks and Recreation

The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.

2. The City of San Diego ED shall return the Draft Monitoring Report to the PI via the RE for revision or, for preparation of the Final Report.
3. The PI shall submit a revised Draft Monitoring Report to City of San Diego ED via the RE for approval.
4. The City of San Diego ED shall provide written verification to the PI of the approved report.
5. The City of San Diego ED shall notify the RE of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and cataloged.
2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area, that faunal material is identified as to species, and that specialty studies are completed, as appropriate.

C. Curation of artifacts: Accession Agreement and Acceptance Verification

1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with the City of San Diego ED and the Native American representative, as applicable.
2. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection C.
3. The PI shall submit the Accession Agreement and catalog record(s) to the RE or BI, as appropriate for donor signature, with a copy submitted to the City of San Diego ED.
4. The RE or BI, as appropriate, shall obtain a signature on the Accession Agreement and shall return it to PI with a copy submitted to the City of San Diego ED.
5. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE and the City of San Diego ED.

D. Final Monitoring Report(s)

1. After notification from the City of San Diego ED of the approved report, the PI shall submit one copy of the approved Final Monitoring Report to the RE and one copy to the City of San Diego ED (even if negative) within 90 days .
2. The RE shall not issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from the City of San Diego ED, which includes the Acceptance Verification from the curation institution.

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CHAPTER 12 CONSULTANTS AND AGENCIES CONSULTED

12.1 CONSULTANTS

Dudek
RRM Design Group

12.2 AGENCIES

City of San Diego
Engineering & Capital Projects Department
San Diego Fire-Rescue Department
Environmental Services Department
Development Services Department
City Attorney's Office

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