THE PRESERVE AT TORREY HIGHLANDS
Additional Information Statement to the Final Environmental Impact Report

City Project No. 442880
SCH No. 2016031026

Lead Agency:

City of San Diego
Development Services Department

1222 First Avenue, MS 501
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AIS-1 INTRODUCTION

On April 2, 2019, the Planning Commission voted 7-0-0 to recommended approval of the Preserve at Torrey Highlands project to the City Council. As part the recommendation motion, the Planning Commission required the following: (1) removal of one story from Building 1; (2) removal of two stories from the Parking Structure; (3) increase of landscaping trees on the south side of the parking structure to provide additional screening; and lastly, (4) address the infeasibility of carbon offsets as additional mitigation measures to reduce impacts from greenhouse gas emissions. Therefore, the project has been reduced to 420,000 square feet of office building area. The parking structure height would be reduced by 2 aboveground levels, resulting in 5 aboveground levels, and a half subterranean level. Lastly, additional oak trees would be planted south of the parking structure, for a total of 18 trees.

This Additional Information Statement (AIS) has been prepared to provide information on how the project changes would affect the conclusions of the Final Environmental Impact Report (FEIR). The project, now incorporating these changes, is now referred to as the "reduced project." The project described in the FEIR, which does not incorporate these changes, is referred to as the "original project" or "originally proposed project."

Based on the analysis summarized in this AIS, the Reduced Project would not result in any new impacts when compared with the original project that was analyzed in the FEIR. Nor would the revised project increase the intensity of impacts associated with the originally proposed project.

AIS 1-1 History of Project Changes

As indicated above, in response to the motion received from the Planning Commission on April 4, 2019, the project has been revised as follows:

- Removal of 2 aboveground levels of the parking structure. The revised parking structure design includes 5 aboveground levels, and a half subterranean level.
- Increase in total grading from 127,000 cubic yards of cut at a 40-foot depth to 130,300 cubic yards of cut at a 40-foot depth.
- Increase in soil export to 52,300 cubic yards, from 49,000 cubic yards.
- Office Building 1 would be reduced by 1 floor (i.e., 30,000 square feet), so that, collectively, Office Buildings 1, 2, and 3 would total 420,000 square feet. This is a reduction from 450,000 square feet.
- Additional oak trees would be planted south of the parking structure, for a total of 18 trees.
- Additional GHG mitigation measures would be implemented, refer to Table AIS-1 below.

AIS-2 PROJECT DESCRIPTION

For a more detailed description of the project, please refer to Chapter 3, Project Description of the Final EIR. The project would construct three office buildings, an accessory structure, and a parking structure. Building 2 would include a 5,000-square-foot fitness center, and each office building would include

subterranean parking spaces (see Parking Facilities below for details). The amenity building would include a private café that is linked to walking paths, outdoor seating, and various meeting/collaboration areas. Various site improvements would be constructed, including driveways, walkways, and landscaping. Please see figure AIS-1, for the revised site plan. Figures AIS-2a through AIS-2b show the revised Office Building 1 elevations and Figures AIS-3a through AIS-3c show the revised parking structure elevations.

The following *Table AIS-1, Project Comparison* has been provided to summarize the project changes.

Table AIS-1
Project Comparison

Project Features	Original Project	Reduced Project
Project Design		
Total Office Building Area	450,000 square feet	420,000 square feet
Office Building 1 Area	180,000 square feet	150,000 square feet
Office Building 2 Area	120,000 square feet	120,000 square feet
Office Building 3 Area	150,000 square feet	150,000 square feet
Amenity Building	3,850 square feet	3,850 square feet
Parking Structure Area	437,690 square feet	357,890 square feet
Office Building 1 Max Height	99 feet, 0 inches	84 feet, 6 inches
Office Building 2 Max Height	70 feet, 0 inches	70 feet, 0 inches
Office Building 3 Max Height	84 feet, 6 inches	84 feet, 6 inches
Parking Structure Max Building Height	73 feet, 0 inches	52 feet, 0 inches
Total Grading Quantities	127,000 cubic yards	130,300 cubic yards
Grading Soil Export	49,000 cubic yards	52,300 cubic yards
Parking Spaces (Total)	1,781 spaces	1,391 spaces
Mitigation Measures		
Air Quality and Odor		
MM-AQ-1: Engine Tier requirements within construction contracts	Yes	Yes
MM-AQ-2: Engine Tier requirements	Yes	Yes

Table AIS-1
Project Comparison

Project Features	Original Project	Reduced Project
Biological Resources		
MM-BIO-1: Preconstruction, construction, and post-construction biological resource protection	Yes	Yes
MM-BIO-2: On-site preservation and off-site purchase of Tier I and Tier IIIA habitat	Yes	Yes
MM-BIO-3: Covenant of Easement	Yes	Yes
MM-BIO-4: Evidence of permits obtained	Yes	Yes
Historical Resources		
MM-CUL-1: Preconstruction plan check, letters of qualification, verification of records search, and Archaeological Monitoring Exhibit; construction monitoring, discovery notification process, and determination of significance	Yes	Yes
Paleontological Resources		
MM-PALEO-1: Preconstruction plan check, letters of qualification, verification of records search, and Paleontological Monitoring Exhibit; construction monitoring, discovery notification process, determination of significance, and night and/or weekend work notification; post-construction monitoring report, handling of fossil remains, curation of fossil remains, and final monitoring report	Yes	Yes
Transportation/Circulation		
MM-TRA-1: Camino del Sur/SR-56 Westbound Ramps: payment of Facilities Benefit Assessment (FBA) fees toward the construction of Torrey Highlands Public Facilities Financing Plan (PFFP) Project No. T-1.3 (corresponding Black Mountain Ranch PFFP Project No. T-15.1) to complete the northbound to westbound loop on-ramp, to the satisfaction of the City Engineer.	Yes	Yes
MM-TRA-2: Camino del Sur/SR-56 Eastbound Ramps: payment of Facilities Benefit Assessment (FBA) fees toward the construction of Torrey Highlands Public Facilities Financing Plan (PFFP) Project No. T-1.3 (corresponding Black Mountain Ranch PFFP Project No. T-15.1) southbound to eastbound loop on-ramp, to the satisfaction of the City Engineer.	Yes	Yes

Table AIS-1
Project Comparison

Project Features	Original Project	Reduced Project
MM-TRA-3: Black Mountain Road/SR-56 Westbound Ramps: payment of fair share contribution (12.0%, to the satisfaction of the City Engineer) toward the unfunded portion of Rancho Peñasquitos Public Facilities Financing Plan (PFFP) Project No. T-2D (corresponding Black Mountain Ranch PFFP Project No. T-57, Pacific Highlands Ranch PFFP Project No. T-11.1) to widen Black Mountain Road from Twin Trails Drive to the Community Plan boundary to its ultimate classification as a six-lane primary arterial to the satisfaction of the City Engineer. This would include the restriping of the Black Mountain Road overpass at SR-56 to provide three thru lanes in the northbound direction and associated widening north of the interchange, to the satisfaction of the City Engineer.	Yes	Yes
MM-TRA-4: Black Mountain Road/SR-56 Eastbound Ramps: payment of fair share contribution (15.6%, to the satisfaction of the City Engineer) toward the unfunded portion of Rancho Peñasquitos Public Facilities Financing Plan (PFFP) Project No. T-2D (corresponding Black Mountain Ranch PFFP Project No. T-57, Pacific Highlands Ranch PFFP Project No. T-11.1) to widen Black Mountain Road from Twin Trails Drive to the Community Plan boundary to its ultimate classification as a six-lane primary arterial to the satisfaction of the City Engineer. This would include the restriping of the Black Mountain Road overpass at SR-56 to provide three thru lanes in the northbound direction and associated widening north of the interchange, to the satisfaction of the City Engineer.	Yes	Yes
MM-TRA-5: Black Mountain Road/Park Village Road: payment of fair share contribution (14.7%, to the satisfaction of the City Engineer) toward the unfunded portion of Rancho Peñasquitos Public Facilities Financing Plan (PFFP) Project No. T-2D (corresponding Black Mountain Ranch PFFP Project No. T-57, Pacific Highlands Ranch PFFP Project No. T-11.1) to widen Black Mountain Road from Twin Trails	Yes	Yes

Table AIS-1
Project Comparison

Project Features	Original Project	Reduced Project
Drive to the Community Plan boundary to its ultimate classification as a six-lane primary arterial, to the satisfaction of the City Engineer.		
MM-TRA-6: Black Mountain Rd from SR-56 Eastbound Ramps to Park Village Road: payment of fair share contribution (8.7%, to the satisfaction of the City Engineer) toward the unfunded portion of Rancho Peñasquitos Public Facilities Financing Plan (PFFP) Project No. T-2D (corresponding Black Mountain Ranch PFFP Project No. T-57, Pacific Highlands Ranch PFFP Project No. T-11.1) to widen Black Mountain Road from Twin Trails Drive to the Community Plan boundary to its ultimate classification as a six-lane primary arterial to the satisfaction of the City Engineer.	Yes	Yes
MM-TRA-7: SR-56 from Carmel Valley Road to Camino del Sur (Eastbound): payment of Facilities Benefit Assessment (FBA) fees toward the construction of the Torrey Highlands FBA for the construction of the Torrey Highlands Public Facilities Financing Plan Project No. T-1.2B to expand SR-56 from I-5 to I-15 from a four-lane freeway to a six-lane freeway, to the satisfaction of the City Engineer.	Yes	Yes
MM-TRA-8: SR-56 from Camino del Sur to Black Mountain Road (Eastbound): payment of Facilities Benefit Assessment (FBA) fees toward the construction of the Torrey Highlands Public Facilities Financing Plan Project No. T-1.2B to expand SR-56 from I-5 to I-15 from a four-lane freeway to a six-lane freeway, to the satisfaction of the City Engineer.	Yes	Yes
MM-TRA-9: SR-56 from Camino del Sur to Black Mountain Road (Westbound): payment of Facilities Benefit Assessment (FBA) fees toward the construction of the Torrey Highlands Public Facilities Financing Plan Project No. T-1.2B to expand SR-56 from I-5 to I-15 from a four-lane freeway to a six-lane freeway, to the satisfaction of the City Engineer.	Yes	Yes

Table AIS-1
Project Comparison

Project Features	Original Project	Reduced Project
Greenhouse Gas Emissions[1]		
MM-GHG-1: Solar photovoltaic (PV) system	Yes; 25,000 square feet	Yes; 106,600 square feet
MM-GHG-2: Energy efficiency over the 2016 Title 24 Standards	Yes; 5%	Yes; 5%
MM-GHG-3: Cool roof	Yes	Yes
MM-GHG-4: Consistency with "Plumbing Fixtures and Fittings" requirement of the City's CAP Consistency Checklist	Yes	Yes
MM-GHG-5: Electric vehicle-capable (pre-wired) parking spaces	Yes; 107 spaces	Yes; 107 spaces
MM-GHG-6: Bicycle parking spaces	Yes; 90 short-term and 90 long-term	Yes; 90 short-term and 90 long-term
MM-GHG-7: Shower facilities	Yes; 12 shower stalls and 48 two-tier lockers	Yes; 12 shower stalls and 48 two-tier lockers
MM-GHG-8: Carpool/vanpool spaces	Yes; 179 spaces	Yes; 179 spaces
MM-GHG-9: Consistency with "Transportation Demand Management Program" requirement of the City's CAP Consistency Checklist	Yes	Yes
MM-GHG-10: Employer network in the SANDAG iCommute program	Yes	Yes
MM-GHG-11: Partially subsidized monthly transit passes for employees	Yes	Yes
MM-GHG-12: Partially subsidized vanpool/rideshare services to all employees	Yes	Yes
MM-GHG-13: Require office tenants to offer a telework program	Yes	Yes
MM-GHG-14: Construction emissions carbon credits	No	Yes
MM-GHG-15: Operation emissions carbon credits	No	Yes
Visual Effects and Neighborhood Character		
MM-VIS-1: Spot elevations and contour grading techniques	Yes	Yes

Note:

[1] While mitigation is proposed for GHG emissions, impacts would remain significant unmitigated impacts.

Office Buildings

Changes to the Site Plan would result in a reduction in building office space and parking structure space. Building 1 would be reduced from six stories to five stories, and 180,000 square feet to 150,000 square feet, thus reducing the overall office building area from 450,000 square feet to 420,000 square feet. No changes would occur for Building 2 and 3.

Parking

The parking structure would be reduced from seven aboveground levels, and one and one half below grade level (eight total levels) to five aboveground levels, and a half subterranean level (six total levels). This would result in a reduction from 1,781 to 1,391 parking spaces. The number of surface parking spaces and subterranean parking spaces located underneath each office building would not change.

Landscaping

Originally nine oak trees were to be planted directly south of the parking structure. However, nine additional oak trees would be planted south of the parking structure, for a total of 18 trees. Landscaping would otherwise not change throughout the project site.

Grading

The reduced project would result in an increase in total grading from 127,000 cubic yards of cut at a 40-foot depth to 130,300 cubic yards of cut at a 40-foot depth. This would result in an increase in soil export to 52,300 cubic yards. Originally, 49,000 cubic yards of total soil export was anticipated; therefore, total grading quantities would increase by 3,300 cubic yards of export.

GHG Mitigation Measures

As described in Table AIS-1, additional mitigation measures are now included which would further reduce GHG emissions than those described in the FEIR. These mitigation measures include additional solar PV system coverage to include the three buildings and parking structure, and programmable thermostat timers.

The installation of programmable thermostat timers would not create any new impacts, because less energy efficient features were assumed to be installed as part of the original project, and the reduced project GHG mitigation measures would just further ensure that these features are more energy efficient. Additionally, the installation of additional PV systems would not create any additional visual impacts as discussed in Section AIS 3-3.

AIS-3 ENVIRONMENTAL ISSUES

The FEIR identified the following potentially significant impacts related to the project: transportation/circulation, visual effects and neighborhood character, GHG emissions, air quality and odor, biological resources, historical resources, paleontological resources, and tribal cultural resources, and noise. Potential impacts to air quality and odor, biological resources, cultural resources, paleontological resources, and tribal cultural resources, would be mitigated to less than significant. Transportation/circulation, visual effects and neighborhood character, air quality and odor, and GHG emission impacts would remain significant and unavoidable. With the reduced project, associated impacts would either remain the same or be proportionately reduced.

The FEIR indicated the following issue areas would be less than significant: land use and energy. All of these would remain less than significant with the revised project. The FEIR also indicated the following issue areas as "Effects Not Found To Be Significant" in Chapter 7.0: agricultural and forestry resources, geologic conditions, health and safety, hydrology, mineral resources, public services and facilities, public utilities, and water quality. All of these would remain as effects not found to be significant with the revised project.

Based on the discussion provided below, recirculation of the EIR is not required. Section 15088.5 of the CEQA Guidelines (Cal. Code Regs., tit. 14, §§ 15000-15387 et seq.) indicates that recirculation of an EIR is only required if a change in the project would result in the addition of significant new information. Pursuant to Section 15088.5(a) of the CEQA Guidelines:

"Significant new information" requiring recirculation includes, for example, a disclosure or additional data or other information showing that:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

No new significant impacts would occur, nor would any significant impacts be substantially increased by the revised project.

The FEIR adequately addresses all of the impacts associated with the revised project.

Section 15088.5 therefore states that the addition of information to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project, or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project proponents have declined to implement. The following analysis is provided for the revised project to demonstrate no new impacts would occur.

AIS 3-1 LAND USE

Impact

The reduced project would include a Community Plan Amendment to the Torrey Highlands Subarea Plan to increase the intensity of and redesignate the project site from Commercial Limited (CL) to Employment Center (EC). The project would also rezone the project site from AR-1-1 to IP-3-1 (industrial park, which allows for research and development, office, and residential uses) (City of San Diego 2008). Because the reduced project proposes 420,000 square feet of business office development, including associated amenity building and parking garage, the project would be consistent with the land uses allowed under the EC designation. The reduced project would be consistent with the intention of the EC and IP-3-1 site designations. The reduced project would not result in an inconsistency or conflict with the goals, objectives, or guidelines of the General Plan, the Torrey Highlands Subarea Plan, or any other applicable plans. Impacts would be less than significant. Because the reduced project would not introduce any elements that would require a deviation or variance, impacts would be less than significant.

The reduced project would not conflict with the provisions of the City's MSCP or other approved local, regional, or state habitat conservation plan. Impacts would be less than significant.

The reduced project would not result in an incompatible land use as the site is located outside of the airport safety zone contour. Additionally, based on mandatory compliance with FAA regulatory criteria as described, the project would not result in an aircraft-related hazard. Therefore, impacts associated with airport land use compatibility and impacts from aircraft would be less than significant.

The interior noise levels associated with the reduced project are anticipated to be approximately 42 dBA CNEL or lower and the exterior noise levels would not exceed 70 dBA. Therefore, the reduced project would not result in an exceedance of the City's adopted noise ordinance and would be compatible with Table 5.1-1, City of San Diego Land Use – Noise Compatibility Guidelines; therefore, impacts would be less than significant.

The reduced project would not divide an established community; therefore, impacts would be less than significant.

Mitigation, Monitoring and Reporting

As with the original project, no mitigation measures would be required for land use impacts.

AIS 3-2 TRANSPORTATION/CIRCULATION

Impact

The reduced project would result in a trip generation reduction from 5,264 to 4,996 average daily trips (ADT) from the original project. As with the original project, the reduced project would result in significant and unavoidable impacts associated with an increase in projected traffic.

As discussed in the updated Transportation Impact Analysis, the reduced project would result in an increase from 49,000 to 52,300 cubic yards of export from the original project. Therefore, total grading quantities would increase by 3,300 cubic yards of export. The increase in haul trucks to handle the additional export is not anticipated to result in construction traffic impacts. Assuming haul trucks have a capacity of 16 cubic yards each, this increase in export would result in an additional 413 haul truck trip ends (3,300 cubic yards ÷ 16 cubic yards/truck = 206.25 trucks; 206.25 trucks x 2-trip ends per truck = 413 total truck trip ends). The grading phase would occur over a 17-day period, so the number of additional daily haul truck trips would amount to 25 truck ADT. This would amount to 75 ADT assuming a passenger car-equivalent factor of 3.0 for heavy vehicles. Because haul truck trips would occur throughout the 7-hour construction period per day, this equates to about 11 PCE trip ends per hour. Therefore, traffic impacts from construction activities would remain less than significant.

The reduced traffic at the project access points would not create a hazard for vehicles, bicycles, or pedestrians entering or exiting the site. Therefore, the project would not increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Impacts would be less than significant.

The reduced project proposes to carry trail access through the site via on-site pedestrian and bicycle linkages to planned trail systems proposed by the Merge 56 project. In addition, pedestrian crossings would be provided at the Northerly Driveway connecting employees/visitors of the project site to the amenities proposed by the Merge 56 project. The project would not interfere with any proposed transit and the project proposes a TDM plan that includes coordination with Merge 56 and MTS to determine how and when routes could be implemented to serve the area and measures to incentivize office employees to use alternative forms of transportation. Therefore, the project would not substantially alter the present circulation movements in the area including public access to open space areas. Additionally, the project would not conflict with adopted policies, plans or programs supporting alternative transportation models. Impacts are considered less than significant.

Mitigation, Monitoring and Reporting

Significant impacts would result, and mitigation measures **MM-TRA-1** through **MM-TRA-9** would be required for traffic/circulation impacts. With implementation of **MM-TRA-1** through **MM-TRA-5**, impacts to intersection operations would be mitigated to a less than significant level. With implementation of **MM-TRA-6** through **MM-TRA-9**, impacts to street segments and freeway operations would be mitigated to a less than significant level. However, because neither the City nor the applicant can ensure the completion of these improvements in a timely manner, the impacts would remain significant and not fully mitigated.

AIS 3-3 VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

Impact

As part of the reduced project, a reduction in the building height would occur in the southern and northern portions of the site. As discussed in the FEIR in *Section 5.3, Visual Effects and Neighborhood Character*, while the project would be visible from adjacent public areas such as roads (SR-56, Camino del Sur, Carmel Mountain Road (in Rancho Peñasquitos to the northeast of the site) and Torrey Santa Fe Road) and the Del Mar Mesa Preserve, the project would not substantially block public views and would not obscure or otherwise interrupt available views to a significant visual landmark. The uppermost floors of the structures are anticipated to be visible in views from SDG&E access roads and proposed viewpoints within the Del Mar Mesa Preserve. However, these views of the project site as identified in the Resource Management Plan would not be prominent due to the substantial distance between the viewer and the project site. The project would not substantially block a designated public view corridor, or public viewing areas of a public resource as currently identified in adopted applicable plans. Therefore, impacts regarding obstruction of any vista or scenic view from a public viewing area would be less than significant. Also, the reduced project would involve placement of additional trees immediately south of the parking structure to provide enhanced visual screening. The reduced project would result in a less than significant impact.

The project would not create a disorganized appearance or significantly conflict with the height, bulk or coverage regulations of the zone or the bulk and scale of existing and presumed to be existing development in the vicinity. The project does include retaining walls that would exceed six feet in height and 50 feet in length, but these walls would be screened by landscaping to reduce visibility from public views. Additionally, the project would be designed to integrate with the surrounding existing and presumed to be existing land uses. Moreover, the project would provide visual interest in terms of the architectural design through recessed exteriors and landscaping palette to provide screening features such that the project would not result in a monotonous, single-form structural development. Therefore, the project would be compatible with the existing and presumed to be existing development, and impacts resulting from the creation of a negative aesthetic site or project would be less than significant. Additional trees would be placed immediately south of the parking structure to provide visual screening.

The reduced project would result in an increase in the area of photovoltaic panels to be installed on the roof of the office buildings, as compared to the original project. Mechanical screens would partially block views of the photovoltaic panels, and the building façade would partially screen the photovoltaic panels (approximately 4 feet of the panel height). The photovoltaic panels would not substantially exceed the height of the mechanical screens. As shown in Table AIS-1, the maximum building height of Buildings 2 and 3 would not increase as part of the reduced project, and Building 1 and the parking garage maximum height would decrease. Therefore, the reduced project would result in a decrease in overall building height. The reduced project would result in a less than significant impact associated with height, bulk, or coverage regulations. The project would not create a disorganized appearance or significantly conflict with the height, bulk, or coverage regulations of the zone or the bulk and scale of existing and presumed to be existing development in the vicinity. Additionally, the project would be designed to integrate with the surrounding existing and presumed to be existing land uses. Moreover, the project would provide visual interest in terms of the architectural design through recessed exteriors and landscaping palette to provide screening features such that the project would not result in a monotonous, single-form structural development. The project would not strongly contrast with the surrounding development or natural topography through excessive height, bulk, signage, or architectural projections. Therefore, impacts would be less than significant.

Impacts to distinctive or landmark trees would be less than significant, for the reduced project.

No significant light or glare impacts would result from the reduced project. Although the project would introduce a new light source, the project would comply with the City's Outdoor Lighting Regulations. Additionally, the project would feature glass exteriors that would extend more than 50% of its exterior; however, the glass material would not exceed a light reflectivity greater than 30% consistent with the City's Glare Regulations. Therefore, a less-than-significant light and glare impact would result.

The reduced project would result in an increase in total grading from 127,000 cubic yards of cut at a 40-foot depth to 130,300 cubic yards of cut at a 40-foot depth, a 3,300 cubic yard increase. The additional 3,300 cubic yards of export would be required to accommodate a subterranean portion of the parking garage. Cut and fill during grading and excavation activities would be unbalanced, and the project would alter more than the City's threshold of 2,000 cubic yards of grading per acre for excavation and fill. The additional 3,300 cubic yards of grading cut would not present a significant new visual change to the landform, as the excavation would occur within the existing pad to accommodate the additional subterranean levels of the below grade structure. The additional grading associated with the reduced project would not result in a more substantial or severe impact when compared to the original project.

Mitigation, Monitoring and Reporting

As with the original project, mitigation measure **MM-VIS-1** would reduce impacts to visual effects and neighborhood character (landform alteration); however, not to below a level of significance. Therefore, impacts would remain significant and unmitigated for the reduced project.

AIS 3-4 GREENHOUSE GAS EMISSIONS

Impact

Construction Emissions

The reduced project would be built within the same construction period as analyzed for the original project and no additional equipment will be required. However, the reduced project would require 52,300 cubic yards of soil export, and would result in an increase in total grading from 127,000 cubic yards of cut at a 40-foot depth to 130,300 cubic yards of cut at a 40-foot depth, a 3,300 cubic yard increase (including excavation for the parking garage). Table AIS-2 presents construction emissions for the reduced project in 2018, 2019, and 2020 from on-site and off-site emission sources. The decrease in office building square footage would result in a reduction in construction GHG emissions associated with the decrease in the duration of construction phasing (i.e., building construction (stage 1)), duration of equipment use, worker trips associated with construction duration, and reduction in vendor trips, which were not quantified for the reduced project construction GHG emissions. Thus, the reduced project construction emissions are conservatively estimated below.

Table AIS-2
Reduced Construction
Greenhouse Gas Emissions

Year	CO_2	CH_4	N_2O	CO_2e
	Metric Tons			
Reduced Project Emissions				
2018	1,160	<1	0	1,164
2019	5,789	<1	0	5,806
2020	1,417	<1	0	1,421
Total	**8,366**	**1**	**0**	**8,392**
Amortized Construction Emissions over 30 years (MT/Year)				*280*

CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent; MT/Year = metric tons per year.
See Appendix A for detailed results.

As shown in Table AIS-2, the estimated GHG emissions generated during reduced project construction would be approximately 8,392 metric tons of carbon dioxide equivalent (MT CO_2e). Estimated project-generated construction emissions amortized over 30 years would be approximately 280 MT CO_2e per year.

Operational Emissions

Operational emissions for the reduced project would include emissions from area sources, energy usage, solid waste generation, water supply, and wastewater treatment, and mobile trips. The reduced project operational emissions in 2020 (i.e., first full year of project operation) are shown in Table AIS-3.

Table AIS-3
Reduced Project Buildout Operational Greenhouse Gas Emissions

Emission Source	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
Reduced Project Emissions				
Area	<1	<1	0	<1
Energy	2,654	<1	<1	2,665
Mobile	3,824	<1	0	3,830
Solid waste	86	5	0	212
Water supply and wastewater	415	3	<1	501
Total	**6,979**	**8**	**<1**	**7,208**

See Appendix A for detailed results. CO_2 = carbon dioxide; CH_4 = methane; GHG = greenhouse gas; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.
Emissions estimates are based on a buildout year of 2020. Totals may not sum due to rounding.

As shown in Table AIS-3, emissions from the reduced project would be approximately 7,208 MT CO_2e per year.

Mitigation, Monitoring and Reporting

MM-GHG-14 Prior to issuance of the first grading permit, the owner/permittee shall provide evidence to the Environmental Designee and the City's Office of Sustainability that the owner/permittee has purchased and retired carbon credits, in a quantity sufficient to offset 100% of the project's construction emissions, which total 8,392 metric tons of carbon dioxide equivalent (MT CO_2E) (note: this number reflects all the construction-related GHG emissions after applying all project design features and reductions), pursuant to the performance standards and requirements described below.

a. The carbon offsets that are purchased to reduce GHG emissions shall achieve real, permanent, quantifiable, verifiable, and enforceable reductions as set forth in California Health and Safety Code Section 38562(d)(1).

b. One carbon offset credit shall mean the past reduction or sequestration of 1 MT CO_2E that is "not otherwise required" (CEQA Guidelines Section 15126.4[c][3]).

c. Carbon offsets shall mean an instrument issued by any of the following: (i) the Climate Action Reserve, the American Carbon Registry, and the VERRA; (ii) any registry approved by the California Air Resources Board (CARB) to act as a registry under the state's Cap-and-Trade Program; or (iii) if no registry is in existence as identified in options (i) and (ii), above, then any other reputable registry or entity that issues carbon offsets that is acceptable to the City of San Diego.

MM-GHG-15 As to operational GHG emissions, prior to the issuance of the first building permit, the owner/permittee shall purchase and retire carbon offsets in a quantity sufficient to offset for a 30-year period, the project's operational GHG emissions to equal the emissions associated with the comparative project allowed under existing land uses, which total 122,400 MT CO_2E (4,080 MT CO_2E per year × 30 years), consistent with the performance standards and requirements set forth below.

a. The carbon offsets that are purchased to reduce GHG emissions shall achieve real, permanent, quantifiable, verifiable, and enforceable reductions as set forth in California Health and Safety Code Section 38562(d)(1).

b. One carbon offset credit shall mean the past reduction or sequestration of 1 MT CO_2E that is "not otherwise required" (CEQA Guidelines section 15126.4[c][3]).

c. Carbon offsets shall mean an instrument issued by any of the following: (i) the Climate Action Reserve, the American Carbon Registry, and the VERRA; (ii) any registry approved by CARB to act as a registry under the state's Cap-and-Trade Program; or (iii) if no registry is in existence as identified in options (i) and (ii), above, then any other reputable registry or entity that issues carbon offsets under the state's Cap-and-Trade Program. If no CARB-approved registry is in existence, then the owner/permittee shall purchase off-site carbon offset credits from any other reputable registry or entity that is acceptable to the City of San Diego.

d. The "project life" is 30 years. This methodology is consistent with the 30-year project life time frame used by the South Coast Air Quality Management District's GHG guidance (SCAQMD 2008).

The estimated operational project-generated GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, water supply, and wastewater treatment, considering the project design features and implementation of **MM-GHG-1** through **MM-GHG-15,** are shown in Table AIS-4.

Table AIS-4
Estimated Net Greenhouse Gas Emissions After Mitigation

Emission Source	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
Construction Emissions (One Time)	8,366	1	0	8,392
Reductions from MM-GHG-14				***(8,392)***
Area	<1	<1	0	<1
Energy	1,949	<1	<1	1,957
Mobile	3,753	<1	0	3,758
Solid waste	21	1	0	53
Water supply and wastewater	332	2	<1	401
Annual Operational Emissions	6,055	4	<1	6,169
Existing Land Use Buildout Operational Emissions				2,089
Net Annual Operational GHG Emissions				4,080
30-Year Project Life Time Operational Emissions				**122,400**
Reductions from MM-GHG-15				***(122,400)***
Net GHG Emissions After Mitigation				**0**

Notes: CO_2 = carbon dioxide; CH_4 = methane; GHG = greenhouse Gas; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent; GHG = greenhouse gas.
See Appendix A for detailed results.
Emissions estimates are based on a buildout year of 2020.
Totals may not sum due to rounding.
Not all reductions were quantifiable, but the greenhouse gas emission reductions quantified include MM-GHG-1, MM-GHG-2, MM-GHG-14, and MM-GHG-15.

The estimated operational project-generated GHG emissions would be reduced following implementation of **MM-GHG-1** through **MM-GHG-15.** According to the National Renewable Energy Laboratory PV Watts Calculator, the solar photovoltaic system for the reduced project, as presented in **MM-GHG-1** would generate approximately 2,612,726 kilowatt-hours of energy per year (NREL 2017).[1]

As shown in Table AIS-4, following implementation of **MM-GHG-1** through **MM-GHG-15,** the project would not result in a net increase in GHG emissions when compared to the previously approved Our Lady of Mount Carmel Church project, which was considered consistent with the existing General Plan and zoning land use designations (i.e., 1,200-seat church and 500-student school). However, the City does not currently have a specific mechanism in place for tracking and/or assessing the purchase of carbon offset credits on a project-specific basis as related to the CAP. Therefore, to be conservative, the reduction of

[1] To calculate the energy production of the photovoltaic system, PV Watts default values were used for a commercial system in the 92129 zip code.

carbon emissions attributable to MM-GHG 14 and MM-GHG-15 has not been considered in the significance determination, and impacts would therefore remain significant and not fully mitigated.

AIS 3-5 AIR QUALITY AND ODOR

Impact

Construction Emissions

The reduced project would be built within the same construction period and no additional equipment will be required as compared to the original project. However, the reduced project would require 52,300 cubic yards of soil export. The reduced project would result in an increase in total grading from 127,000 cubic yards of cut at a 40-foot depth to 130,300 cubic yards of cut at a 40-foot depth, a 3,300 cubic yard increase, which includes excavation for the parking garage. Table AIS-5 shows the estimated maximum daily construction emissions associated with the construction of the reduced project.

Table AIS-5
Reduced Project Maximum Daily Construction
Criteria Air Pollutant Emissions

Construction Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Reduced Project Emissions						
2018	22.71	284.38	165.52	0.48	42.21	22.80
2019	42.73	255.61	223.94	0.64	33.12	14.89
2020	40.09	196.69	187.52	0.54	27.42	11.75
Maximum Daily Emissions	**42.73**	**284.38**	**223.94**	**0.64**	**42.21**	**22.80**
Emission Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Threshold Exceeded?	No	**Yes**	No	No	No	No

Notes: See Appendix A for complete results.
VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SOx = oxides of sulfur; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns.

As shown in Table AIS-5, maximum daily construction criteria air pollutant emissions would remain below the significance thresholds for VOC, CO, SO_x, PM_{10}, and $PM_{2.5}$; therefore, impacts during construction would remain less than significant for these pollutants. Daily construction emissions would exceed the significance threshold for NO_x; therefore, as with the original project, mitigation measures MM-AQ-1 and MM-AQ-2 would be implemented, as described below. As shown in Table AIS-7, below, with implementation of mitigation (MM-AQ-1 and MM-AQ-2), daily construction emissions of NO_x would be reduced to below a level of significance.

Operational Emissions

Operation of the project would result in area source, energy consumption, and mobile trip emissions. Table AIS-6 presents the maximum daily emissions associated with the operation of the reduced project after all construction has been completed. The values shown for motor vehicles and area sources are the maximum summer or winter daily emissions results from CalEEMod.

Table AIS-6
Reduced Project Daily Maximum Operational
Criteria Air Pollutant Emissions

Emission Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Reduced Project Emissions						
Area	12.50	<0.01	0.20	<0.01	<0.01	<0.01
Energy	0.25	2.28	1.91	0.01	017	0.17
Mobile	8.90	35.41	97.26	0.31	25.63	7.05
Total	**21.64**	**37.69**	**99.37**	**0.33**	**25.81**	**7.23**
Emission Threshold	*55*	*250*	*550*	*250*	*100*	*55*
Threshold Exceeded?	No	No	No	No	No	No

Notes: See Appendix A for complete results.
VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = oxides of sulfur; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns.
Emissions represent maximum of summer and winter. Summer emissions are representative of the conditions that may occur during the ozone 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).

As shown in Table AIS-6, the daily operational emissions from the reduced project would be below the City's significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$. Operational emissions were found to be less than significant for all criteria pollutants.

Mitigation, Monitoring and Reporting

Resulting emission following implementation of mitigation measures MM-AQ-1 and MM-AQ-2 are shown in Table AIS-7.

Table AIS-7
Reduced Project Maximum Daily Construction Emissions - Mitigated

Construction Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Reduced Project Emissions						
2018	11.13	188.69	166.01	0.48	20.74	10.11
2019	30.84	187.24	226.85	0.64	27.08	9.23
2020	29.69	150.54	191.64	0.54	23.21	7.80
Maximum Daily Emissions	**30.84**	**188.69**	**226.85**	**0.64**	**27.08**	**10.11**
Emission Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Threshold Exceeded?	No	No	No	No	No	No

Notes: See Appendix A for complete results.
VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SOx = oxides of sulfur; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns.

As shown in Table AIS-7, following implementation of mitigation measure **MM-AQ-1 and MM-AQ-2,** daily construction emissions of NO_x would be reduced to below a level of significance.

The revised project construction schedule would not change when compared to the original project. However, an additional 1,657 one-way haul truck trips would be required as part of the reduced project to accommodate greater grading quantities. The additional 1,657 one-way haul truck trips traveling 0.19 miles would not result in a change in the annual PM_{10} emissions. Therefore, the estimated health risk associated with the reduced project would be the same estimated health risk as the original project. Impacts to sensitive receptors would be less than significant.

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 architectural coatings. Such odors are temporary and generally occur at magnitudes that would not affect substantial numbers of people. Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The project would not result in the creation of a land use that is associated with odors.

As previously discussed, project construction would result in a temporary addition of pollutants to the local airshed, partially caused by soil disturbance and fugitive dust emissions. Implementation of the reduced project would generate construction-related air pollutant emissions from entrained dust and exhaust from internal combustion engines used by construction equipment. Pollutant emissions associated with construction activity were

quantified using CalEEMod, and as shown in Table AIS-7, the estimated maximum daily mitigated construction dust emissions would not exceed the City's thresholds.

The project's operational emissions would generate PM dust emissions from mobile and stationary sources, including vehicular traffic and area sources (water heating and landscaping). Pollutant emissions associated with operational activity were quantified using CalEEMod, and as shown in Table AIS-6, it was found the PM dust generated per day during operation of the project would not exceed the City's thresholds.

AIS 3-6 HISTORICAL RESOURCES

Impact

Construction of the reduced project would involve grading and other earthmoving activities that could result in impacts to unanticipated surface or subsurface cultural resources; therefore, mitigation is proposed (**MM-CUL-1**). **MM-CUL-1** would reduce impacts to less than significant.

Mitigation, Monitoring and Reporting

An archaeologist and Native American monitor would be required to monitor excavation activities. Implementation of **MM-CUL-1** would be required to reduce impacts to less than significant for the reduced project.

AIS 3-7 PALEONTOLOGICAL RESOURCES

Impact

Construction of the reduced project would involve grading and other earthmoving activities that may impact paleontological resources on the site. The reduced project would result in an increase in total grading from 127,000 cubic yards of cut at a 40-foot depth to 130,300 cubic yards of cut at a 40-foot depth, a 3,300 cubic yard increase. Soil would be removed within a slightly greater area than was analyzed in the FEIR for the original project, largely for greater excavation required for the parking structure. Because the maximum depth of excavation associated with the reduced project would not exceed the maximum depth associated with the original project, the reduced project is not anticipated to result in a more substantial or severe impact when compared to the original project. Although the reduced project would result in a slightly greater area of excavation, this new area of excavation would be proximate to the area of excavation for the original project; therefore, the reduced project would not excavate soils in an area of increased sensitivity to paleontological resources. The risk of encountering paleontological resources is not more substantial or severe when compared to the original project. However, a potential impact was identified in the FEIR and requires mitigation (**MM-PALEO-1**). Per the City's CEQA Significance Determination Thresholds, if grading would exceed 1,000 cubic yards and excavation would reach a depth

of more than 10 feet, paleontological monitoring would be required (City of San Diego 2011). Therefore, paleontological monitoring would be required for the original and reduced project. **MM-PALEO-1** would reduce impacts associated with the reduced project to less than significant.

Mitigation, Monitoring and Reporting

A paleontologist would be required to monitor excavation activities. If significant fossil-bearing materials are encountered, these materials would be salvaged. Implementation of **MM-PALEO-1** would be required to reduce impacts to less than significant for the reduced project.

AIS 3-8 TRIBAL CULTURAL RESOURCES

Impact

Construction of the reduced project would involve grading and other earthmoving activities that could result in impacts to unanticipated tribal cultural resources; therefore, mitigation is proposed (**MM-TCR-1**). **MM-TCR-1** would reduce impacts to less than significant.

Mitigation, Monitoring and Reporting

An archaeologist and Native American monitor would be required to monitor excavation activities. Implementation of **MM-CUL-1** would be required to reduce impacts to less than significant for the reduced project.

AIS 3-9 NOISE

Impact

As described in *Section 5.10, Noise* of the FEIR, the project would not result in an exceedance of the City's 65 dBA CNEL exterior noise standard for residential land uses, the City's 70 dBA CNEL exterior noise standard for office land uses, nor would it result in an increase of 3 dBA or more at receivers currently exceeding the 65 dBA CNEL noise standard under either existing or year 2035 conditions. Since the reduced project would reduce traffic ADT, traffic noise impacts from the reduced project at off-site noise-sensitive receivers would remain at less than significant levels.

The reduced project noise generated from parking lots and HVAC equipment at presumed to be existing and occupied residential uses as part of the Merge 56 project would also remain at a level that is less than significant.

Maximum daily construction noise would remain unchanged as the project would still be built within the same construction period and no additional equipment would be required. As described in *Section 5.10, Noise* of the FEIR, at the nearest presumed to be existing and occupied residential uses as part

of the Merge 56 project, the construction noise level is estimated to be approximately 65 dBA Leq12-hr. Therefore, the levels would not exceed the City's 12-hour average noise standard of 75 dBA. Construction noise impacts would be less than significant. However, sensitive biological resources could be significantly affected by short-term construction-related noise. Compliance with the City's LUAGs, as contained in Section 1.4.3 of the MSCP Subarea Plan, would be incorporated as a condition of approval for the project. Furthermore, mitigation measure **MM-BIO-1** would be implemented, which would require City-standard pre-construction surveys to be conducted to determine the presence of sensitive biological resources, including sensitive bird species. Therefore, noise impacts to sensitive biological resources would be less than significant.

Mitigation, Monitoring and Reporting

Mitigation measures similar to the originally proposed project (MM-BIO-1) would be required. With implementation of MM-BIO-1, impacts would be less than significant.

AIS 3-10 ENERGY

Impact

Construction

The reduced project would be built within the same construction period as the original project and no additional equipment will be required. Fuel consumption would result from construction worker, vendor, and haul trips.

Table AIS-8
Construction Worker Gasoline Demand

Phase	Trips	Vehicle CO_2 (MT)	Kg/CO_2/Gallon	Gallons
Site Preparation	120	1.09	8.78	123.61
Grading	340	2.90	8.78	330.08
Utilities	1,320	11.94	8.78	1,359.74
Building Construction 1	175,100	1443.71	8.78	164,431.29
Building Construction 2	128,775	1011.91	8.78	115,252.27
Building Construction 3	156,825	1176.08	8.78	133,949.87
Sitework	1,950	17.13	8.78	1,950.67
Architectural Coating 2	20,400	140.13	8.78	15,960.26
Parking Structure	9,775	72.24	8.78	8,227.71
Cafe	74,800	531.62	8.78	60,549.23
Architectural Coating 3	17,595	116.93	8.78	13,317.23
Architectural Coating 1	13,005	84.78	8.78	9,656.13

Table AIS-8
Construction Worker Gasoline Demand

Phase	Trips	Vehicle CO_2 (MT)	Kg/CO_2/Gallon	Gallons
Landscape	535	4.56	8.78	519.40
Paving	860	6.11	8.78	695.34
			Total	**526,322.82**

Table AIS-9
Construction Vendor Diesel Demand

Phase	Trips	Vehicle CO_2 (MT)	Kg/CO_2/Gallon	Gallons
Site Preparation	96	3.82	10.21	373.69
Grading	272	10.64	10.21	1,042.44
Utilities	660	26.23	10.21	2,569.14
Building Construction 1	75,808	2940.03	10.21	287,956.16
Building Construction 2	55,752	2134.90	10.21	209,098.47
Building Construction 3	67,896	2546.61	10.21	249,423.35
Sitework	0	0.00	10.21	0.00
Architectural Coating 2	0	0.00	10.21	0.00
Parking Structure	4,232	157.32	10.21	15,408.39
Cafe	32,384	1197.65	10.21	117,301.67
Architectural Coating 3	0	0.00	10.21	0.00
Architectural Coating 1	0	0.00	10.21	0.00
Landscape	0	0.00	10.21	0.00
Paving	0	0.00	10.21	0.00
			Total	**883,173.31**

Table AIS-10
Construction Haul Diesel Demand

Phase	Trips	Vehicle CO_2 (MT)	Kg/CO_2/Gallon	Gallons
Site Preparation	24	0.95	10.21	93.42
Grading	6,538	257.61	10.21	25,230.96
Utilities	110	4.37	10.21	428.18
Building Construction 1	0	0.00	10.21	0.00
Building Construction 2	0	0.00	10.21	0.00

Table AIS-10
Construction Haul Diesel Demand

Phase	Trips	Vehicle CO_2 (MT)	Kg/CO_2/Gallon	Gallons
Building Construction 3	0	0.00	10.21	0.00
Sitework	0	0.00	10.21	0.00
Architectural Coating 2	0	0.00	10.21	0.00
Parking Structure	0	0.00	10.21	0.00
Cafe	0	0.00	10.21	0.00
Architectural Coating 3	0	0.00	10.21	0.00
Architectural Coating 1	0	0.00	10.21	0.00
Landscape	0	0.00	10.21	0.00
Paving	0	0.00	10.21	0.00
			Total	**25,752.56**

Table AIS-11
Construction Equipment Diesel Demand

Phase	Pieces of Equipment	Equipment CO_2 (MT)	Kg/CO_2/Gallon	Gallons
Site Preparation	6	11.70	10.21	1,145.71
Grading	12	82.34	10.21	8,064.94
Utilities	5	45.26	10.21	4,433.19
Building Construction 1	17	674.93	10.21	66,104.74
Building Construction 2	17	495.12	10.21	48,493.48
Building Construction 3	21	804.93	10.21	78,837.83
Sitework	2	132.77	10.21	13,003.84
Architectural Coating 2	2	81.70	10.21	8,002.35
Parking Structure	7	36.06	10.21	3,531.40
Cafe	3	79.55	10.21	7,791.68
Architectural Coating 3	2	70.47	10.21	6,902.03
Architectural Coating 1	2	52.09	10.21	5,101.50
Landscape	2	29.85	10.21	2,923.87
Paving	8	61.50	10.21	6,023.93
			Total	**260,360.48**

In summary, the reduced project is estimated to consume approximately 526,323 gallons of gasoline and 1,169,286 gallons of diesel during the construction phase. In total, 1,695,609 gallons of petroleum would be consumed during the construction phase of the reduced project, which is anticipated to extend over 22 months.

Petroleum use is necessary to operate construction equipment, and construction equipment would employ Tier 3 engines or higher (and thus would be newer off-road equipment units). Additionally, energy used during construction of the project would be limited to the construction period, and would not involve long-term petroleum use. As such, energy consumption during construction activities would continue to be not considered excessive, inefficient or unnecessary. Moreover, the demand for jobs in the project vicinity demonstrates that the proposed construction would also not be considered unnecessary.

Operations

Operational emissions for the project would result from area sources, energy usage, solid waste generation, water supply, and wastewater treatment, and mobile trips. The reduced project's operational consumption would be reduced to approximately 9,047,753 kilowatt-hours of electricity per year and 8,479,800 thousand British thermal units of natural gas per year. The original project's annual operational consumption of electricity and natural gas was estimated to be approximately 9,700,000 kilowatt-hours of electricity and 9,000,000 thousand British thermal units, respectively. The original and reduced project would implement all Step 2 measures as required under the City's Climate Action Plan Consistency Checklist, as discussed in *Section 5.4, Greenhouse Gas Emissions* of the FEIR. Additionally, the reduced project would implement all feasible on-site GHG mitigation measures to reduce electricity consumption including **MM-GHG-1** (solar photovoltaic installations), **MM-GHG-2** (exceedance of Title 24 requirements variable refrigerant flow systems for the heating, ventilation and air conditioning (HVAC) system; high performance glazing; and heat reflecting roofing material), **MM-GHG-3** (cool roof), and **MM-GHG-4** (low flow fixtures)

The reduced project would reduce total daily VMT to 8,891,945 from operation. Annual mobile source gasoline fuel consumption is estimated to be reduced to 403,389, while mobile source diesel consumption was estimated to be reduced to 28,202 gallons per year. Daily mobile source fuel consumption from the original project was estimated to be 422,540 gallons, while mobile source diesel demand was estimated to be 29,541 gallons. Additionally, the original and reduced project would implement all Step 2 measures as required under the City's Climate Action Plan Consistency Checklist, as discussed in Section 5.4, Greenhouse Gas Emissions. As part of the project's implementation of the Climate Action Plan Step 2 Checklist measures, the project has been designed to incentivize the minimization of petroleum consumption through its provision on on-site electric vehicle charging station infrastructure, bicycle parking, ride-sharing opportunities, and telecommuting options for employees. Moreover, the reduced project would implement a comprehensive Transportation Demand Management program to further reduce vehicle miles travelled. Specifically, these features

would be implemented through all feasible on-site GHG mitigation to reduce petroleum consumption including **MM-GHG-5** (electric vehicle pre-wiring and electric vehicle charging stations), **MM-GHG-6** (bicycle parking), **MM-GHG-7** (shower stalls and lockers), **MM-GHG-8** (carpool/vanpool parking), **MM-GHG-9** (alternative parking strategies and TDM reporting requirement), **MM-GHG-10** (participation in SANDAG iCommute program), **MM-GHG-11** (subsidized transit passes), **MM-GHG-12** (subsidized vanpool/rideshare program), and **MM-GHG-13** (telework program). Refer to Section 5.4, Greenhouse Gas Emissions, for full description of these mitigation measures. Furthermore, as part of the project's Transportation Demand Management program, the applicant/permittee will provide transportation educational information to all employees and conduct alternative transportation promotional events on site. See Section 5.2, Transportation/Circulation for additional details on the project's Transportation Demand Management Program.

In summary, although the reduced project would continue to result in an increase in petroleum use during construction and operation compared to existing conditions, the reduced project would implement measures as required under the Climate Action Plan's Checklist regarding VMT reduction, and Travel Demand Management Program measures to reduce the amount of petroleum consumption. Additionally, project-specific petroleum use would be expected to diminish over time as fuel efficiency improves. Given these considerations, petroleum consumption associated with reduced project operation would continue to not be considered excessive.

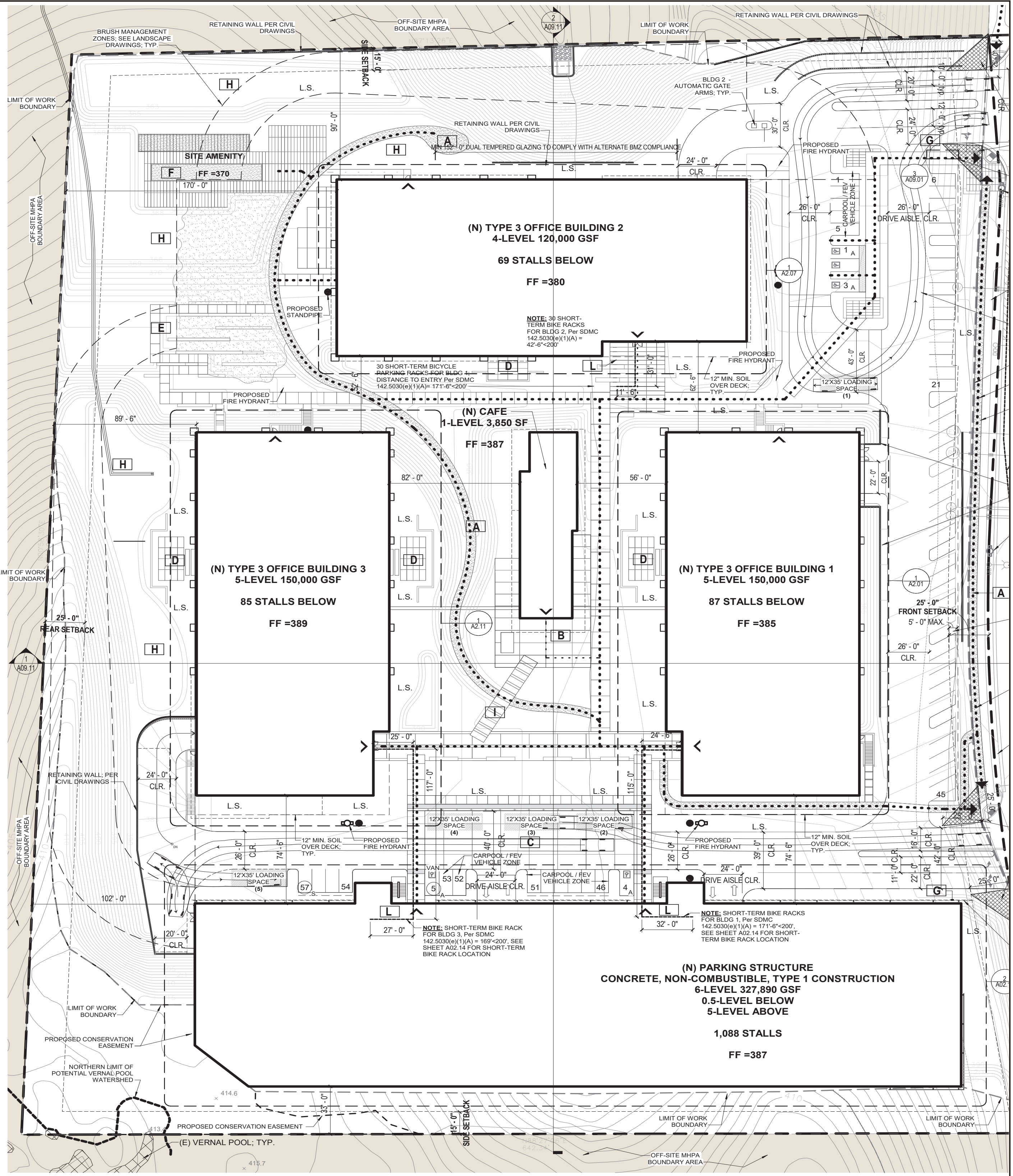
Mitigation, Monitoring and Reporting

As with the original project, because no significant impacts would result from the reduced project, no mitigation measures would be required for excessive, inefficient or unnecessary consumption of energy.

REFERENCES

City of San Diego. 2008. City of San Diego General Plan. Adopted by the County of the City of San Diego on March 10, 2008. Accessed March 2017. https://www.sandiego.gov/ planning/genplan.

City of San Diego. 2011. City of San Diego California Environmental Quality Act Significance Determination Thresholds. Development Services Department. January 2011. https://www.sandiego.gov/ sites/default/files/legacy/development-services/pdf/news/sdtceqa.pdf



The Preserve at Torrey Highlands

Revised Site Plan

Project No. 442880

CITY OF SAN DIEGO - DEVELOPMNET SERVICES

FIGURE

AIS-1

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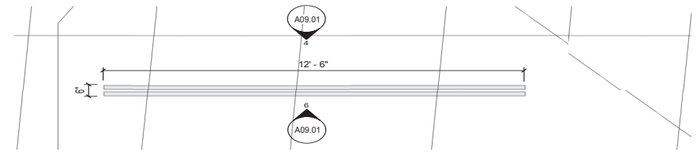
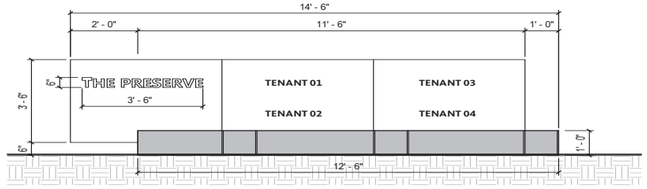


Monument Sign Plan
SCALE: 1/2" = 1'-0" 3



North Monument Sign Elevation
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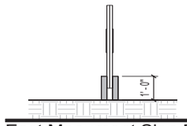

East Monument Sign Elevation
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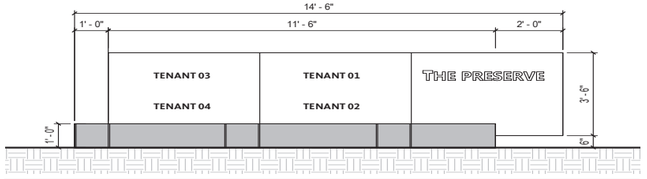

South Monument Sign Elevation
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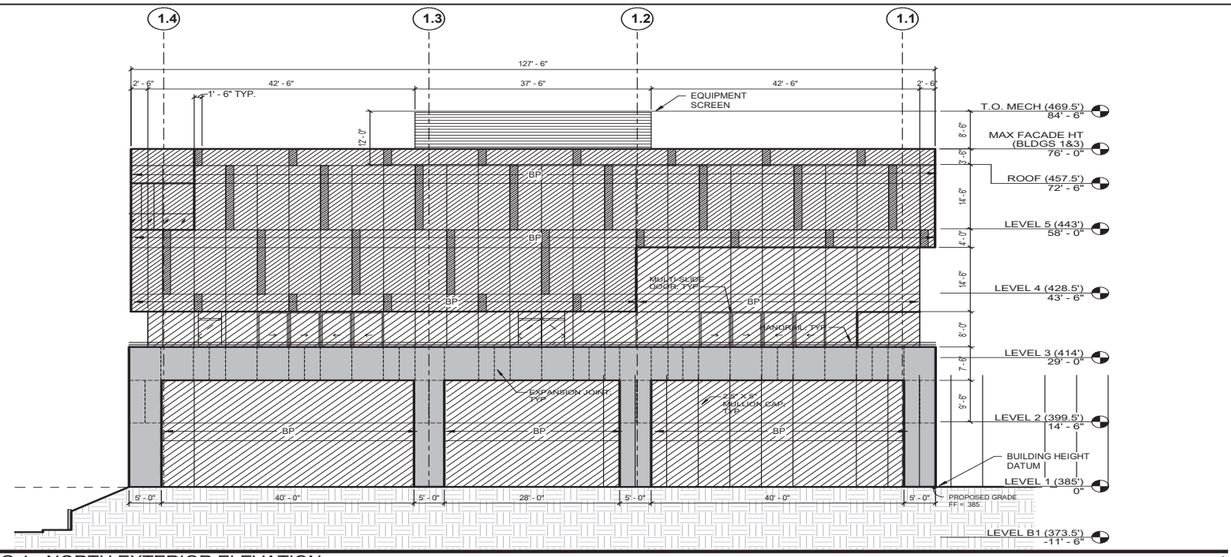
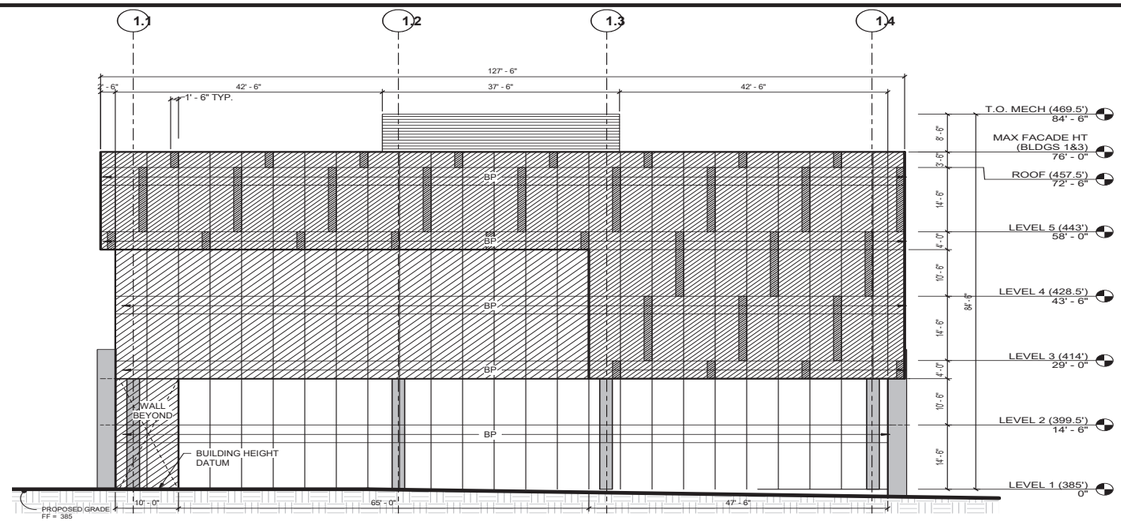


OFFICE BLDG 1 - NORTH EXTERIOR ELEVATION
SCALE: 3/32" = 1'-0" 1



OFFICE BLDG 1 - SOUTH EXTERIOR ELEVATION
SCALE: 3/32" = 1'-0" 2

3" ALUMINUM PANEL	GREY PERFORATED METAL PANEL	BP	GL-1B	1" INSULATED GLASS STARFIRE W/ BACK PAN		GL-3	1" INSULATED GLASS SOLARBAN Z75 OPTIBLUE	BP	GL-4B	1" INSULATED GLASS SOLARBAN 70XL W/ BACK PAN
CAST-IN-PLACE GREY CONCRETE, PAINTED IN MUTED EARTH TONES	METAL CLADDING		GL-2	1" INSULATED GLASS SOLARBAN 70XL	BP	GL-3B	1" INSULATED GLASS SOLARBAN Z75 OPTIBLUE W/ BACK PAN			
STONE TILE WALL		GL-1	1" INSULATED GLASS STARFIRE	BP	GL-2B	1" INSULATED GLASS SOLARBAN 70XL W/ BACK PAN		GL-4	1" INSULATED GLASS SOLARBAN 70XL	

ELEVATIONS
SCALE: 1/2" = 1'-0"

SOURCE: Gensler 2017

Office Building 1 North and South Elevations

Environmental Analysis Section Project No. 442880

CITY OF SAN DIEGO - DEVELOPMENT SERVICES

The Preserve at Torrey Highlands

FIGURE
AIS-2a

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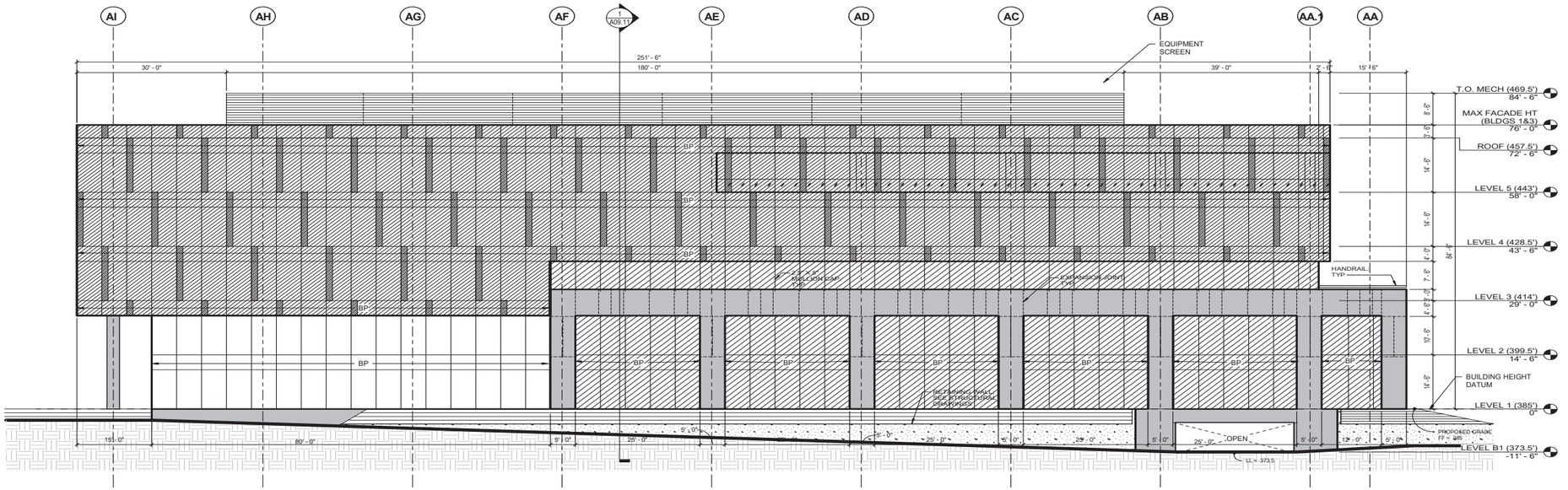
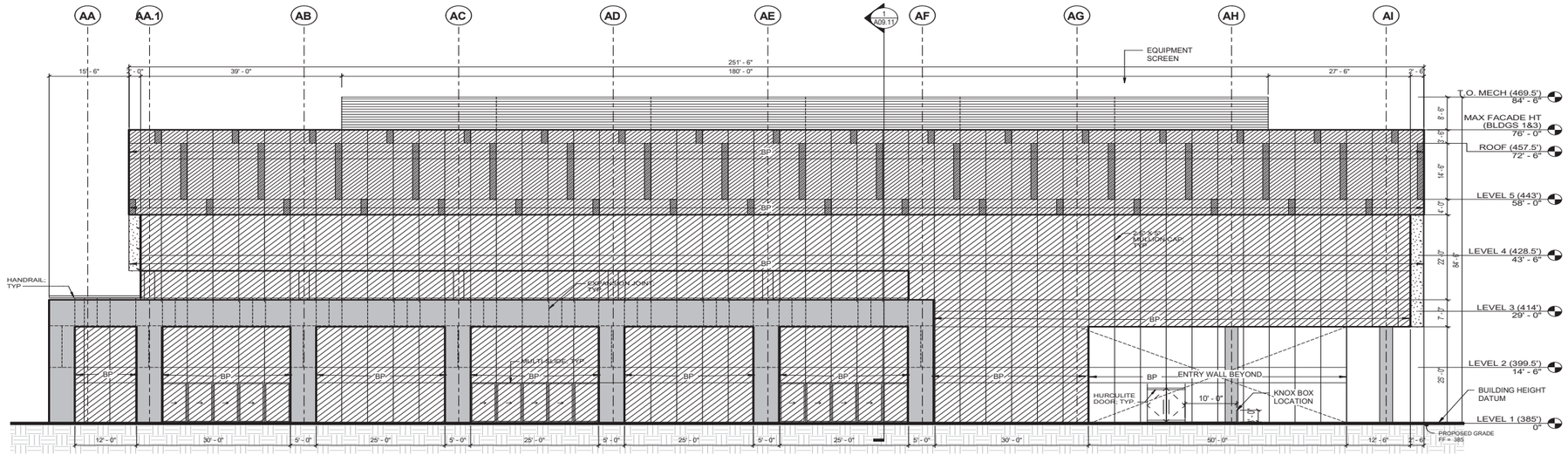


OFFICE BLDG 1 - EAST EXTERIOR ELEVATION

SCALE: 3/32" = 1'-0"

3



OFFICE BLDG 1 - WEST EXTERIOR ELEVATION

SCALE: 3/32" = 1'-0"

4

SOURCE: Gensler 2017

Office Building 1 East and West Elevations

Environmental Analysis Section Project No. 442880

CITY OF SAN DIEGO - DEVELOPMENT SERVICES

The Preserve at Torrey Highlands

FIGURE
AIS-2b

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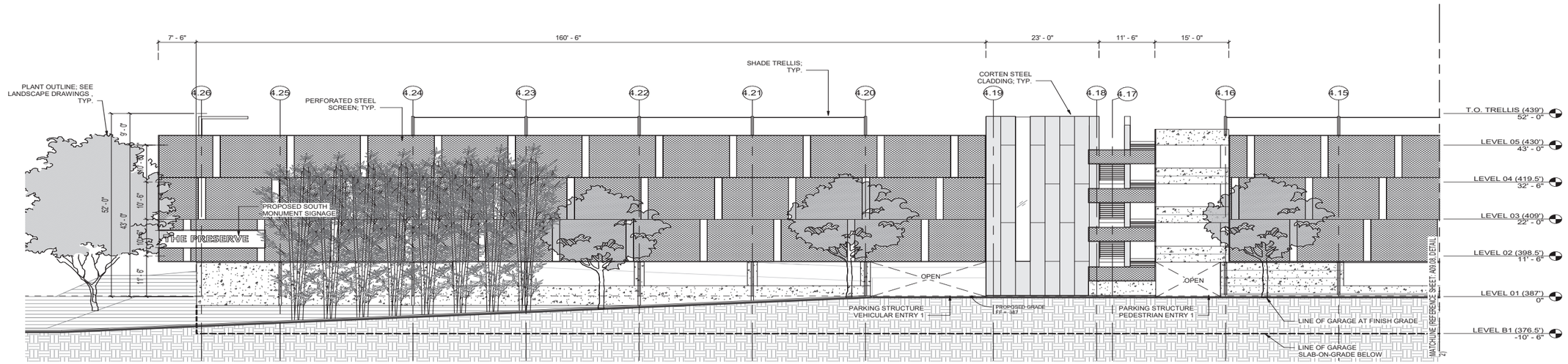
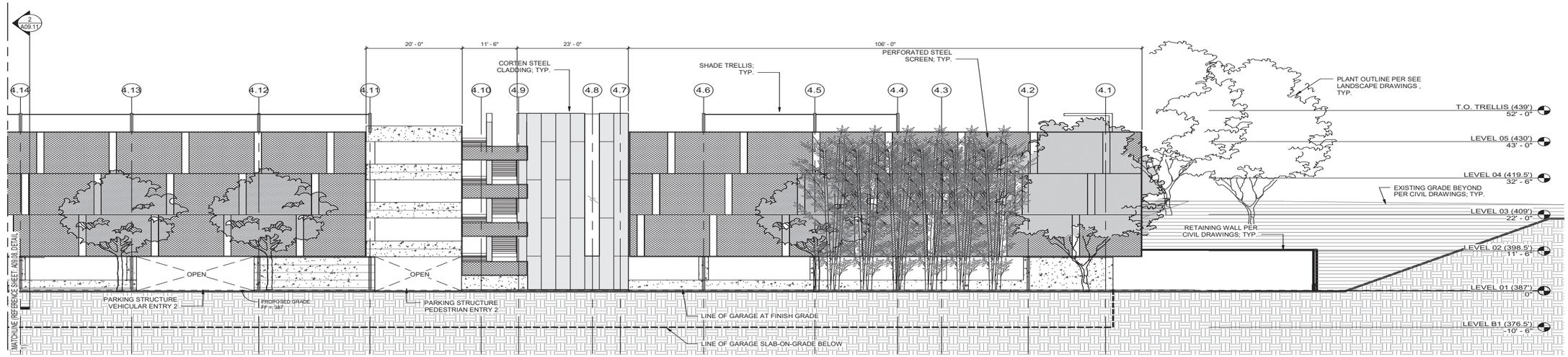


PARKING STRUCTURE - NORTH EXTERIOR ELEVATION 1

SCALE: 1" = 10'-0"

1



PARKING STRUCTURE - NORTH EXTERIOR ELEVATION 2

SCALE: 1" = 10'-0"

2

3" ALUMINUM PANEL	**GREY PERFORATED METAL PANEL**	BP	**GL-1B**	1" INSULATED GLASS STARFIRE W/ BACK PAN	**GL-3**	1" INSULATED GLASS SOLARBAN Z75 OPTIBLUE	BP **GL-4B**	1" INSULATED GLASS SOLARBAN 70XL W/ BACK PAN
CAST-IN-PLACE GREY CONCRETE, PAINTED IN MUTED EARTH TONES	**METAL CLADDING**		**GL-2**	1" INSULATED GLASS SOLARBAN 70XL	BP **GL-3B**	1" INSULATED GLASS SOLARBAN Z75 OPTIBLUE W/ BACK PAN		
STONE TILE WALL	**GL-1**	1" INSULATED GLASS STARFIRE	BP **GL-2B**	1" INSULATED GLASS SOLARBAN 70XL W/ BACK PAN	**GL-4**	1" INSULATED GLASS SOLARBAN 70XL		

ELEVATIONS

SCALE: 1/2" = 1'-0"

SOURCE: Gensler 2017

Parking Structure North Elevations

Environmental Analysis Section Project No. 442880

CITY OF SAN DIEGO - DEVELOPMENT SERVICES

The Preserve at Torrey Highlands

FIGURE
AIS-3a

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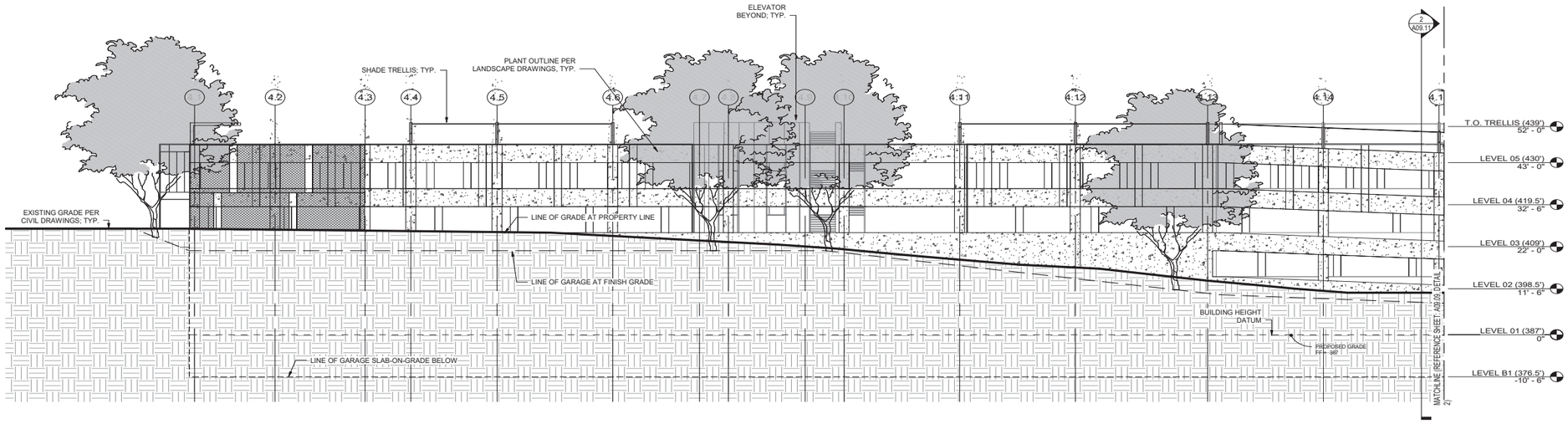
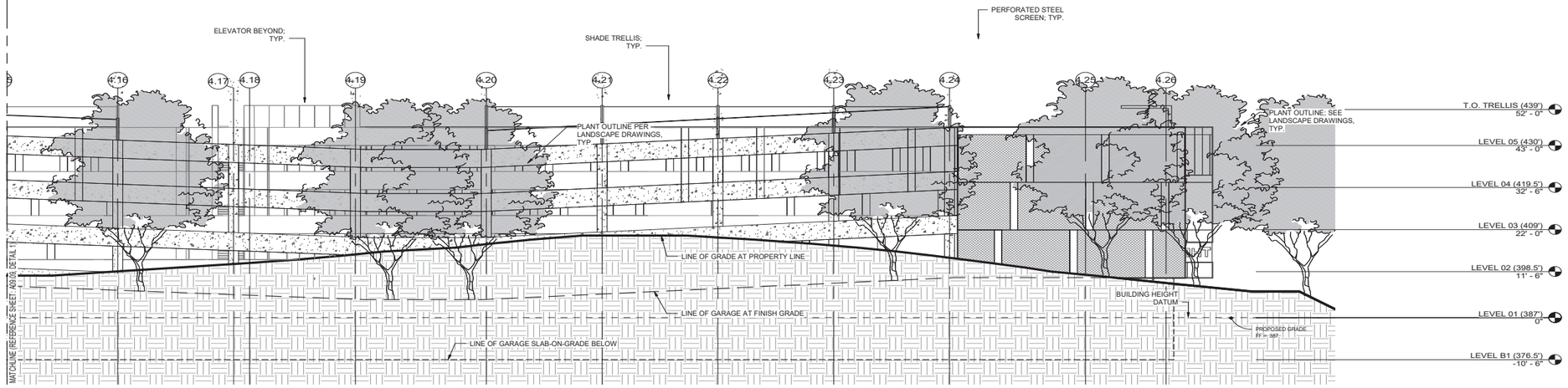


PARKING STRUCTURE - SOUTH EXTERIOR ELEVATION 1

SCALE: 1" = 10'-0"

1



PARKING STRUCTURE - SOUTH EXTERIOR ELEVATION 2

SCALE: 1" = 10'-0"

2

	3" ALUMINUM PANEL		GREY PERFORATED METAL PANEL	BP	GL-1B	1" INSULATED GLASS STARFIRE W/ BACK PAN		GL-3	1" INSULATED GLASS SOLARBAN Z75 OPTIBLUE
	CAST-IN-PLACE GREY CONCRETE, PAINTED IN MUTED EARTH TONES		METAL CLADDING		GL-2	1" INSULATED GLASS SOLARBAN 70XL	BP	GL-3B	1" INSULATED GLASS SOLARBAN Z75 OPTIBLUE W/ BACK PAN
	STONE TILE WALL		GL-1 1" INSULATED GLASS STARFIRE	BP	GL-2B	1" INSULATED GLASS SOLARBAN 70XL W/ BACK PAN		GL-4	1" INSULATED GLASS SOLARBAN 70XL

BP	GL-4B	1" INSULATED GLASS SOLARBAN 70XL W/ BACK PAN

ELEVATIONS

SCALE: 1/2" = 1'-0"

SOURCE: Gensler 2017

Parking Structure South Elevations

Environmental Analysis Section Project No. 442880

CITY OF SAN DIEGO - DEVELOPMENT SERVICES

The Preserve at Torrey Highlands

FIGURE AIS-3b

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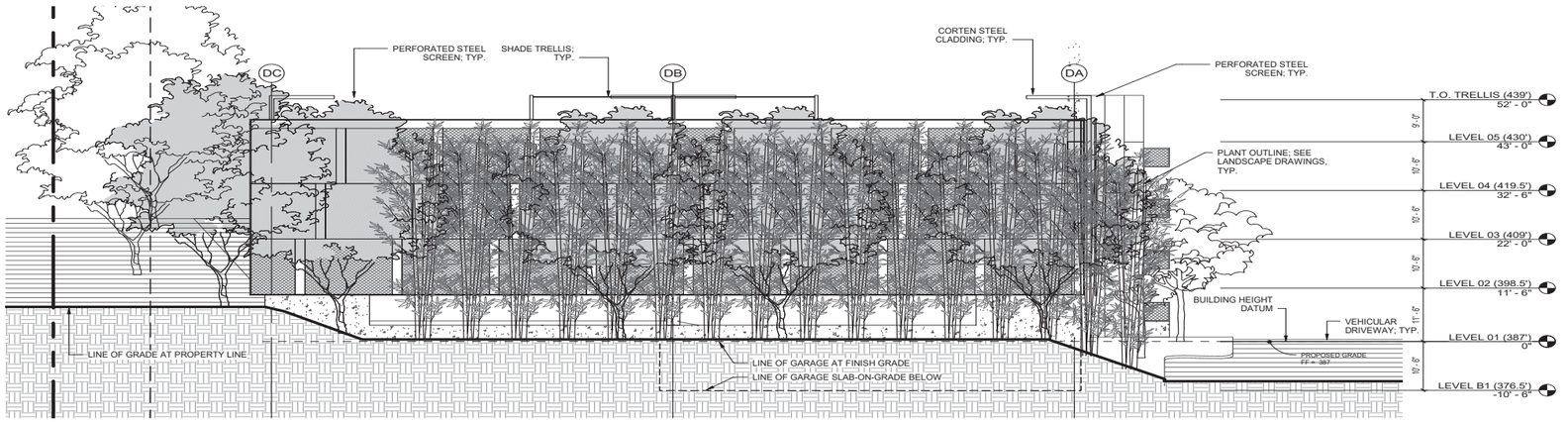
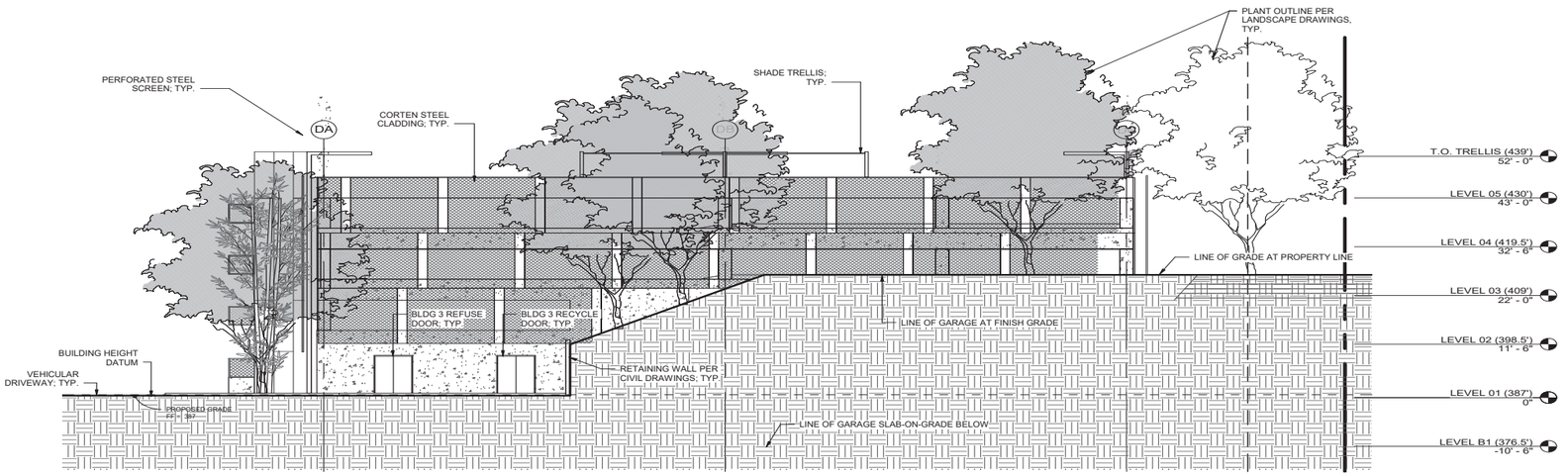


PARKING STRUCTURE - EAST EXTERIOR ELEVATION
SCALE: 1" = 10'-0" 2



PARKING STRUCTURE - WEST EXTERIOR ELEVATION
SCALE: 1" = 10'-0" 1

	3" ALUMINUM PANEL		GREY PERFORATED METAL PANEL	BP	GL-1B	1" INSULATED GLASS STARFIRE W/ BACK PAN		GL-3	1" INSULATED GLASS SOLARBAN Z75 OPTIBLUE	BP	GL-4B	1" INSULATED GLASS SOLARBAN 70XL W/ BACK PAN
	CAST-IN-PLACE GREY CONCRETE, PAINTED IN MUTED EARTH TONES		METAL CLADDING		GL-2	1" INSULATED GLASS SOLARBAN 70XL	BP	GL-3B	1" INSULATED GLASS SOLARBAN Z75 OPTIBLUE W/ BACK PAN			
	STONE TILE WALL		GL-1	1" INSULATED GLASS STARFIRE	BP	GL-2B	1" INSULATED GLASS SOLARBAN 70XL W/ BACK PAN		GL-4	1" INSULATED GLASS SOLARBAN 70XL		

ELEVATIONS
SCALE: 1/2" = 1'-0"

SOURCE: Gensler 2017

Parking Structure East and West Elevations

Environmental Analysis Section Project No. 442880

CITY OF SAN DIEGO - DEVELOPMENT SERVICES

The Preserve at Torrey Highlands

FIGURE AIS-3c

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