



THE CITY OF SAN DIEGO

NEGATIVE DECLARATION

Project No. 677814

SCH No.: N/A

SUBJECT: CLAIREMONT DRIVE: SITE DEVELOPMENT PERMIT (SDP), NEIGHBORHOOD DEVELOPMENT PERMIT (NDP), VESTING TENTATIVE MAP (VTM) and RESCISSION OF CONDITIONAL USE PERMIT (CUP) NO. 195335 to demolish two buildings and to allow the construction of a three-story, 89,250 square-foot, 40-unit multi-family townhome development. The 3.28-acre project site is zoned RM-1-1 (Residential—Multiple Unit) and has a land use designation of Low-Medium Residential (10-15 du/ac) in the Clairemont Community Plan. The project site is located at 3450 Clairemont Drive and is within the Clairemont Community Plan, Montgomery Field Airport Land Use Compatibility Overlay Zone, Clairemont Mesa Height Limit Overlay Zone, Montgomery Field Airport Influence Area – Review Area 2, Montgomery Field FAA Part 77 Noticing Area, and Very High Fire Hazard Severity Zone. (Legal Description: TR 2865 LOT 978*POR*. APN 425-100-05.) Applicant: Warmington Residential California Inc.

I. PROJECT DESCRIPTION:

See attached Initial Study.

II. ENVIRONMENTAL SETTING:

See attached Initial Study.

III. DETERMINATION:

The City of San Diego has conducted an Initial Study and determined that the proposed project will not have a significant environmental effect and the preparation of an Environmental Impact Report will not be required.

IV. DOCUMENTATION:

The attached Initial Study documents the reasons to support the above Determination.

V. MITIGATION MONITORING AND REPORTING PROGRAM:

None required.

VI. PUBLIC REVIEW DISTRIBUTION:

Draft copies or notice of this Negative Declaration were distributed to:

City of San Diego

Mayor's Office (91)
Councilmember Campbell, District 2
Development Services Department
Development Project Manager: Martha Blake
EAS: Jeff Szymanski
LDR Planning – Ana Messina
LDR Engineering – Khan Huynh
LDR Geology- Jacobe Washburn
LDR Landscaping: Vanessa Kohakura
Map Check: Anna Najeeb
PUD-Water Sewer Development: Irina Itkin
Fire-Plan Review: Willard Larson
LDR Transportation Development: Mary Rose Santos
MMC – Sam Johnson
Facilities Financing (93B)
Water Review (86A)
Central Library MS 17 (81a)
Environmental Services Department: Jane-Marie DeFajardo
Planning Department
Long Range Planning: Marlon Pangilinan
Library Department – Government Documents (81)
San Diego Central Library (81A)
Clairemont Branch Library (81H)
City Attorney's Office (93C)

Other Organizations, Groups, and Interested Individuals

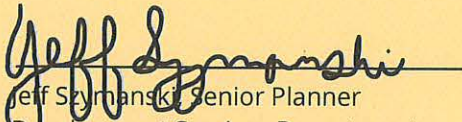
Balboa Avenue Citizens Advisory Committee (246)
Clairemont Mesa Planning Committee (248)
San Diego Mesa College (250)
University of San Diego (251)
Clairemont Senior Citizens Club (252)
Tecolote Canyon Citizens Adv Committee (254)
Friends of Tecolote Canyon (255)
Joe Marciano (256)
Clairemont Town Council (257)
Applicant: Warmington Residential California Inc.

VII. RESULTS OF PUBLIC REVIEW:

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

- () Comments were received but did not address the draft Mitigated Negative Declaration finding or the accuracy/completeness on the Initial Study. No response is necessary. The letters are attached.
- () Comments addressing the finding of the draft Mitigated Negative Declaration and/or accuracy or completeness of the Initial Study were received during the public input period. The letters and responses follow.

Copies of the draft Negative Declaration and any Initial Study material are available in the office of the Development Services Department for review, or for purchase at the cost of reproduction.


Jeff Szymanski, Senior Planner
Development Services Department

October 21, 2021
Date of Draft Report

November 22, 2021
Date of Final Report

Analyst: J. Szymanski

Attachments: Initial Study Checklist
Figure 1 – Vicinity Map
Figure 2 – Location Map
Figure 3 – Site Plan
Figure 4 – Vesting Tentative Map
Figure 5 – Fire Access Plan

Appendices: Appendix A: Air Quality Study
Appendix B: Biological Letter Report
Appendix C: Archaeological Resources Report Form
Appendix D: Preliminary Geotechnical Investigation
Appendix E: CAP Consistency Checklist
Appendix F: Storm Water Quality Management Plan
Appendix G: Drainage Study
Appendix H: Noise Study
Appendix I: Waste Management Plan
Appendix J: Phase I Environmental Site Assessment Report

INITIAL STUDY CHECKLIST

1. Project title/Project number: Clairemont Drive / 677814
2. Lead agency name and address: City of San Diego, 1222 First Avenue, MS-501, San Diego, California 92101
3. Contact person and phone number: Jeff Szymanski / (619) 446-5324
4. Project location: 3450 Clairemont Drive, San Diego, California 92117
5. Project Applicant/Sponsor's name and address: Matthew Esquivel, Project Manager / Warmington Residential California Inc., 3090 Pullman Street, Costa Mesa, California 92626
6. General Plan/Community Plan designation:
General Plan Land Use Designation: Residential
Clairemont Mesa Community Plan Land Use Designation: Low-Medium Residential (10-15 du/ac)
7. Zoning: RM-1-1 (Residential—Multiple Unit) zone
8. Description of project (Describe the whole action involved, including but not limited to, later phases of the project, and any secondary, support, or off-site features necessary for its implementation.):

SITE DEVELOPMENT PERMIT (SDP), NEIGHBORHOOD DEVELOPMENT PERMIT (NDP), VESTING TENTATIVE MAP (VTM), and RESCISSION OF CONDITIONAL USE PERMIT (CUP) NO. 195335 to demolish two existing structures totaling 15,172 square feet and to allow redevelopment of the project site as a townhome project totaling 89,250 square feet. The project site encompasses approximately 3.28 gross acres (1.95 buildable acres) and is located at 3450 Clairemont Drive in the Clairemont community of the City of San Diego. (See Figure 1, *Vicinity Map*, and Figure 2, *Location Map*). The project site is currently developed with the Holy Cross Lutheran Church and Banyan Tree Educational Services, which consist of two buildings, paved parking areas, and other associated improvements such as a playground, basketball court, and landscaping. The Holy Cross Lutheran Church and Banyan Tree Educational Services operate under an approved Conditional Use Permit (CUP No. 195335), which would be rescinded as part of the project actions.

The project proposes to construct eight, three-story townhome buildings comprising 40 two-story townhome units over garages with three and four bedrooms. Some of the units would have dens or optional bedroom/lofts, and each unit would have 2.5 bathrooms (see Figure 3, *Site Plan*). The project would provide two percent affordable units on-site, which equals one unit.

The building architecture would feature a variety of building materials, including light sand finish stucco; fiber cement siding; wood fascia; metal railings, awnings, and garage doors; and various decorative and glass elements. An approximately 6,569-square-foot courtyard would be provided in the central portion of the site as a common amenity space. Additional landscaped areas include the perimeter of the project site, as well as walkways to provide sitewide coverage, to create parkway shade, and to accentuate the entry into the site. In addition, the project would improve the project

frontage on Clairemont Drive by installing a new 7.5-foot-wide non-contiguous sidewalk and adding a 6.5-foot-wide landscaped parkway to include street trees and low-growing shrubs. Access to the townhome development would be via one driveway off Clairemont Drive. Parking would be provided with two-stall tuck-under garages for each townhome and 10 surface guest parking spaces. Four motorcycle parking spaces and 24 bicycle parking spaces would be provided on the project site. Pedestrian access to the site would be from the proposed non-contiguous sidewalk along Clairemont Drive.

Development would occur on the level and previously developed portion of the project site. In total, 2.2 acres of the site would be graded to accommodate the project. Project implementation would involve 4,500 cubic yards (CY) of cut at a maximum cut depth of 3.5 feet and 8,000 CY of fill at maximum depth of 8.5 feet. Approximately 3,500 CY of import would be required. The maximum height of cut slopes would be 14 feet, with a 2:1 slope ratio. Remedial grading for removal and recompaction of existing fill materials would occur within approximately 0.32 acre of steep hillsides, located on the south and west perimeters of the developed pad, that were constructed when the existing development pad was graded. Associated with the removal and recompaction of existing fill materials, a small amount of off-site grading would occur within an existing parking lot located adjacent to the mid-section of the northern property line. The project proposes retaining walls on the south and west perimeters of the development area, as well as along a portion of the northern property line where development would occur. Approximately 900 linear feet of retaining walls would be provided and would range from six feet to 14 feet in height. These retaining walls would additionally serve as a fire management wall along the south and west development area, which would act as alternative compliance for brush management. (See Figure 4, *Vesting Tentative Map*.)

9. Surrounding land uses and setting:

The project site is bounded on the east by Clairemont Drive, on the north by an existing church facility, on the south by an asphalt paved parking area and open canyon space, and on the west by open canyon space. Surrounding land uses include St. Mark's United Methodist Church to the north, single-family residences to the west and south past the canyon space, and Whittier Special Education Center to the east across Clairemont Drive.

Regional access is provided via Interstate (I-) 5, located approximately 1.5 miles west of the site. Local access is provided via Clairemont Drive. The nearest bus stop is located one-tenth of a mile south of the site at Clairemont Drive and Dakota Drive. This bus stop is served by Bus Route 50 (UTC Express to Downtown Express) and Bus Route 105 (Old Town Transit Center to UTC).

The site is characterized by flat terrain (approximately 1.3 acres), with steep hillsides (approximately 2.0 acres, manufactured and natural) in the southern and western portions of the site. Elevations range from approximately 220 feet above mean sea level (AMSL) in the southwest corner of the site to approximately 290 feet AMSL.

The project site is located within the Clairemont Community Plan, Montgomery Field Airport Land Use Compatibility Overlay Zone, Clairemont Mesa Height Limit Overlay Zone, Montgomery Field Airport Influence Area – Review Area 2, Montgomery Field FAA Part 77 Noticing Area, and Very High Fire Hazard Severity Zone. The site is located in a developed area currently served by existing public services and utilities.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):

NONE REQUIRED.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

In accordance with the requirements of Assembly Bill (AB) 52, the City of San Diego initiated AB 52 Consultation on May 7, 2020, and sent notification letters to the Lipay Nation of Santa Ysabel and to the Jamul Indian Village, and a notification letter to the San Pasqual Band of Mission Indians on January 5, 2021. EAS received email correspondence by Tribal Representatives from the Lipay Nation of Santa Ysabel and the Jamul Indian Village that they concur with the findings of the Archaeological Resources Report Form for the 3450 Clairemont Drive Project, San Diego, California prepared for the project and included in Appendix C, had no further concerns for potential impacts to Tribal Cultural Resources, and consultation was closed on this project. The San Pasqual Band of Mission Indians did not respond. (See discussion below under Section V, *Cultural Resources*, for a discussion of Cultural Resources.)

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|---|--|--|
| ☐ Aesthetics | ☐ Hazards & Hazardous Materials | ☐ Public Services |
| ☐ Agriculture and Forestry Resources | ☐ Hydrology/Water Quality | ☐ Recreation |
| ☐ Air Quality | ☐ Land Use/Planning | ☐ Transportation/Traffic |
| ☐ Biological Resources | ☐ Mineral Resources | ☐ Tribal Cultural Resources |
| ☐ Cultural Resources | ☐ Noise | ☐ Utilities/Service System |
| ☐ Energy | ☐ Paleontological Resources | ☐ Wildfire |
| ☐ Geology/Soils | ☐ Population/Housing | ☐ Mandatory Findings Significance |
| ☐ Greenhouse Gas Emissions | | |

DETERMINATION: (To be completed by Lead Agency)

On the basis of this initial evaluation:

- ☒ The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required.
- ☐ Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or (MITIGATED) NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or (MITIGATED) NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis.)

- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses", as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or (mitigated) negative declaration. *Section 15063(c)(3)(D)*. In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated", describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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I) AESTHETICS – Would the project:

a) Have a substantial adverse effect on a scenic vista?

☐
☐
☐
☒

Views within Clairemont Mesa are of Mission Bay and the Pacific Ocean to the west, Fortuna Mountain and Cowles Mountain to the east, and the open space canyon system. The project site is located on the mesa top of Clairemont Mesa and does not have a view to the Pacific Ocean/Mission Bay or Fortuna Mountain/Cowles Mountain. The project would not have any effect on these resources. An open space canyon is located west of the project site. Development of the project would not affect the canyon, nor would it substantially alter views of and/or to the canyon. No public views, scenic vistas, and/or scenic corridors are designated in the Clairemont Community Plan; the Clairemont Mesa Height Limit Overlay Zone was adopted in 1972 to protect some of the existing views. The project would be consistent with the 30-foot height limitation imposed by the Clairemont Mesa Height Limit Overlay Zone.

The project would not have a substantial adverse effect on a scenic vista. No impacts would result.

b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

☐
☐
☐
☒

Per the Clairemont Mesa Community Plan, Tecolote Canyon Natural Park and Marian Bear Memorial Park are resource-based parks, defined as parks located at the site of distinctive scenic, natural, or cultural features and intended for citywide use. The project site is not located immediately adjacent to either of these parks.

Relative to trees, the Community Plan recommends that significant native tree stands should be preserved as part of the protection of sensitive habitat areas. The project site does not have native tree stands, as the site has been previously disturbed with development. Therefore, the project would not affect scenic trees.

The community plan does not reference any rock outcroppings nor does the site contain any such features. Similarly, the site does not contain historic buildings nor is the site within a State scenic highway. The nearest designate State scenic highways are State Route (SR-) 163 through Balboa Park (approximately eight miles south of the project site) and SR-52 through Mission Trails Regional Park (approximately 14 miles east of the project site).

The project would not result in substantial damage to scenic resources. No impacts would result.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

☐
☐
☐
☒

The project is compatible with the surrounding neighborhood and development. The surrounding neighborhood includes one- and two-story single-family and multi-family developments, church buildings of various heights, and parks and recreation facilities. The project proposes two-story townhomes over garages (for a total of three stories above grade) with colors, materials, and architectural features that

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
draw upon the surrounding neighborhood. The project would not substantially degrade the existing visual character or quality of the site or the surrounding area. No impact would result.				
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

The project area is in a neighborhood that has a mix of uses that already include several lighting sources, such as streetlights and building signage. Other sources of light in the vicinity include: homes, commercial uses, parking, and security lighting.

Landscaping and architectural features associated with the project may be illuminated. Additional lighting may be provided in pedestrian areas to provide security. However, new lighting would not create substantial light that would adversely affect daytime or nighttime views in the area. Lighting would be regulated by compliance with Section 142.0740 of the City of San Diego Land Development Code. Glare would be avoided in accordance with Section 142.0730 of the City of San Diego Land Development Code. No more than 50 percent of any single elevation of the building's exterior would be built with a material with a light reflectivity greater than 30 percent. Additionally, the project would not shed substantial light onto adjacent, light-sensitive property or emit a substantial amount of ambient light into the nighttime sky. With the exception of safety lighting within pedestrian circulation areas and illuminated signage, all project lighting would be internal to the building and this lighting would not be shed onto surrounding developments. Adherence to the Land Development Code ensures that project impacts relative to lighting and glare would not occur.

The project would not result in new sources of light or glare that would adversely affect day or nighttime views in the area. Impacts would be less than significant.

II. AGRICULTURAL AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. – Would the project:

a) Converts Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
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The project site is classified as Urban and Built Up Land on the most recent Department of Conservation Farmland Mapping and Monitoring Program (FMMP) map, does not contain any forest land as defined by Public Resources Code Section 12220(g), and does not contain any active agricultural operations. The project would not result in the conversion of prime farmland, unique farmland, or farmland of statewide importance. No impacts would result.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒

Refer to II. A), above. The project would not affect any properties zoned for agricultural use or affected by a Williamson Act Contract, as there are none within the project vicinity. Agricultural land is not present on the site or in the general vicinity of the site. No impacts would result.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
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The project would not conflict with existing zoning for or cause a rezoning of forest land, timberland, or timberland zoned Timberland Production. No designated forest land or timberland occur on-site. No impacts would result.

d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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Refer to II. C), above. Surrounding land uses are built out and no forest land is present. No impacts would result.

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒
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Refer to II. a) -d), above. No impacts would result.

III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied on to make the following determinations – Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
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An Air Quality Study was prepared by BlueScape Environmental, December 18, 2020, that is included in Appendix A.

The project site is located in the San Diego Air Basin (SDAB) and is under the jurisdiction of the San Diego Air Pollution Control District (SDAPCD) and the California Air Resources Board (CARB). Both the State of California and the Federal government have established health-based Ambient Air Quality Standards

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(AAQS) for the following six criteria pollutants: carbon monoxide (CO); ozone (O₃); nitrogen oxides (NO_x); sulfur oxides (SO_x); particulate matter up to 10 microns in diameter (PM₁₀); and lead (Pb). Ozone is formed by a photochemical reaction between NO_x and volatile organic compounds (VOCs). Thus, impacts from O₃ are assessed by evaluating impacts from NO_x and VOCs. A new increase in pollutant emissions determines the impact on regional air quality as a result of a proposed project. The results also allow the local government to determine whether a proposed project would deter the region from achieving the goal of reducing pollutants in accordance with the Air Quality Management Plan (AQMP) in order to comply with Federal and State AAQS. The SDAPCD and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The County Regional Air Quality Strategy (RAQS) was initially adopted in 1991 and is updated on a triennial basis (most recently in 2009). The RAQS outlines the SDAPCD's plans and control measures designed to attain the State air quality standards for O₃. The RAQS relies on information from the 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 the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by San Diego County and the cities in the county as part of the development of their general plans. The RAQS relies on information from CARB and SANDAG, including projected growth in the County, mobile, area, and all other source emissions to project future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through regulatory controls. Projects that propose development that is consistent with the growth anticipated by the General Plan is consistent with the SIP, AQMP, and RAQS. The project proposes redevelopment of the project site with 40 multi-family units. Redevelopment would be in accordance with the underlying zone (RM-1-1) and General Plan and Community Plan land use designations (Residential and Low-Medium Residential, respectively). Therefore, because the project is consistent with the General Plan, it is also consistent with the SIP, AQMP, and RAQS. The project would not induce growth or otherwise add more units than allowed under current zoning. Operation of the project would provide housing for existing residents and is not expected to increase the local population. The project would be consistent with the SIP, AQMP and RAQS. Impacts would be less than significant.				
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
The San Diego Air Basin (SDAB) is considered a non-attainment under Federal standards for O₃ (8-hour standard). The SDAB is in attainment for the State and Federal standards for nitrogen dioxide, carbon monoxide, sulfur dioxide, and lead. The San Diego Air Pollution Control District (SDAPCD) has established thresholds in Rule 20.2 for new or modified stationary sources. With the exception of Volatile Organic Compounds (VOCs) and PM_{2.5} thresholds, the City of San Diego screening quantities shown in the CEQA Significance Determination				

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Thresholds, Table A-2, incorporate screening level thresholds from Rule 20.2 for use in air quality reports and for determining CEQA air quality impacts. The City does not show a standard for PM_{2.5} but does include a threshold for Reactive Organic Gas/Volatile Organic Compounds (ROG/VOC) emissions. Collectively, the standards shown in Table A-2 of the City's 2016 CEQA Determination Thresholds and the PM_{2.5} threshold shown in Table 20.2-1 of SDAPCD Rule 20.2, are used herein to determine whether project emissions would cause a significant air quality impact. The construction and operational emission thresholds for pollutants evaluated are as follows:

- Carbon Monoxide (CO) - 550 pounds/day;
- Nitrogen Oxides (NO_x) - 250 pounds/day;
- Particulate Matter (PM₁₀) - 100 pounds/day;
- Particulate Matter (PM_{2.5}) - 67 pounds/day;
- Sulfur Oxides (SO_x) - 250 pounds/day; and
- Volatile Organic Compounds (VOCs)/Reactive Organic Gases (ROGs) - 137 pounds/day.

Construction Emissions

Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM₁₀ and PM_{2.5}) from soil disturbance and exhaust emissions (NO_x and CO) from heavy construction vehicles. For the purpose of estimating emissions, it was assumed that the 3.28-acre site would be disturbed and developed for overall construction. The number of haul trips to remove demolition debris were estimated based on cubic yards. As noted, construction would generally consist of asphalt and building material removal, site preparation, construction of the buildings and related improvements and the application of architectural coating (painting).

Demolition, site preparation and grading would involve the greatest concentration of heavy equipment use and the highest potential for fugitive dust emissions. The project would be required to comply with SDAPCD Rule 55, which identify fugitive dust standards and is required to be implemented at all construction sites located within the SDAB. Therefore, the following conditions, which generally reduce fugitive dust emissions, were included in CalEEMod for site preparation and grading phases of construction.

1. Minimization of Disturbance. Construction contractors should minimize the area disturbed by clearing, grading, earth moving, or excavation operations to prevent excessive amounts of dust.
2. Soil Treatment. Construction contractors should treat all graded and excavated material, exposed soil areas and active portions of the construction site, including unpaved on-site roadways to minimize fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering shall be done as often as necessary, and at least twice daily, preferably in the late morning and after work is done for the day. Note – it was assumed watering would occur twice daily for modeling purposes.
3. Soil Stabilization. Construction contractors should monitor all graded and/or excavated inactive areas of the construction site at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials shall be applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area shall be seeded and watered until

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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landscape growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.

4. No Grading During High Winds. Construction contractors should stop all clearing, grading, earth moving, and excavation operations during periods of high winds (20 miles per hour or greater, as measured continuously over a one-hour period).
5. Street Sweeping. Construction contractors should sweep all on-site driveways and adjacent streets and roads at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.

Construction is assumed to begin in late 2021, with completion in mid-2023. In addition to SDAPCD Rule 55 requirements, emissions modeling also accounts for the use of low-VOC paint (50 g/L for interior coatings and 100 g/L for exterior coatings) as required by SDAPCD Rule 67. Table 1, *Estimated Maximum Daily Construction Emissions*, summarizes the estimated maximum daily emissions of pollutants occurring during the construction period for the project.

As shown in Table 1, construction of the project would not exceed the SDAPCD regional construction emission thresholds for daily emissions. Thus, the project construction would not conflict with the SIP, RAQS or AQMP, violate an air quality standard or contribute to an existing or projected violation, result in a cumulatively considerable increase in ozone or particulate matter emissions or expose receptors to substantial pollutant concentrations.

Table 1
Estimated Maximum Daily Construction Emissions

Construction Phase	Maximum Emissions (lbs/day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2021 Maximum lbs/day	7.18	72.6	43.7	0.081	18.9	11.5
2022 Maximum lbs/day	1.81	16.1	17.2	0.030	1.08	0.834
2023 Maximum lbs/day	13.5	23.6	29.6	0.051	1.57	1.18
City of San Diego Screening Thresholds	137	250	550	250	100	67
Threshold Exceeded?	No	No	No	No	No	No

Operational Emissions

Operational emissions include emissions from electricity consumption (energy sources), vehicle trips (mobile sources), area sources, landscape equipment and evaporative emissions as the structure is repainted over the life of the project. The majority of operational emissions are associated with vehicle trips to and from the project site. Table 2, *Estimated Operational Emissions*, summarizes emissions associated with operation of the project.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Table 2
Estimated Operational Emissions – Proposed Project

Operational Phase	Estimated Emissions (lbs/day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area	1.72	0.038	3.30	<0.001	0.018	0.018
Energy	0.017	0.145	0.062	<0.001	0.012	0.012
Mobile	0.464	1.733	5.514	0.021	1.95	0.532
Maximum lbs/day	2.20	1.92	8.87	0.022	1.98	0.562
SDAPCD Thresholds	137	250	550	250	100	67
Threshold Exceeded?	No	No	No	No	No	No

As shown in Table 2, operational emissions would not exceed the SDAPCD thresholds for ROG, NO_x, CO, SO_x, PM₁₀ or PM_{2.5}. Therefore, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Impacts would be less than significant.

- c) 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 releasing emissions which exceed quantitative thresholds for ozone precursors)?

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Refer to III. a). The SDAB is considered a non-attainment under Federal standards for O₃ (8-hour standard). As described above in response III. b), construction operations temporarily increase the emissions of dust and other pollutants. However, construction emissions would be temporary and short-term in duration. As shown in Table 1, construction of the project would not exceed the SDAPCD regional construction emission thresholds for daily emissions. Similarly, as shown in Table 2, operational emissions would not exceed SDAPCD thresholds for ROG, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. Thus, project construction would not result in a cumulatively considerable increase in ozone or particulate matter emissions. Impacts would be less than significant.

- d) Create objectionable odors affecting a substantial number of people?

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Development of the project would involve the use of diesel-powered construction equipment. Diesel exhaust may be noticeable temporarily at adjacent properties; however, construction activities would be temporary. The project would not include industrial or agricultural uses that are typically associated with objectionable odors. Therefore, impacts associated with objectionable odors would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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IV. BIOLOGICAL RESOURCES – Would the project:

- a) Have substantial adverse effects, 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 Game or U.S. Fish and Wildlife Service?

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Alden Environmental, Inc., prepared a Biological Letter Report (April 19, 2021) for the project, included as Appendix B. As presented in the Biological Letter Report, on-site habitat includes both wetlands and uplands habitats as shown in Table 3, *Vegetation Communities/Land Cover Types On-Site*.

Table 3 Vegetation Communities/Land Cover Types On-site	
Vegetation Communities/Land Cover ¹	Total Acreage On Site
Wetlands	
Willow riparian forest-disturbed	0.07
Disturbed wetland	0.10
Uplands	
Diegan coastal sage scrub (Tier II)	0.70
Eucalyptus woodland (Tier IV)	0.11
Ornamental (Tier IV)	0.11
Disturbed land (Tier IV)	0.39
Non-native vegetation (no tier)	0.03
Developed (no tier)	1.77
TOTAL	3.28

¹Upland vegetation communities within the MSCP study area have been divided into four tiers of sensitivity (the first includes the most sensitive, the fourth the least) based on rarity and ecological importance. Wetland communities and developed land are not assigned a tier.

The project site includes a developed mesa top that contains non-native vegetation, disturbed land, and ornamental landscaping. A remnant canyon is located in the south and west portions of the project site, where native (predominately Diegan coastal sage scrub) and non-native vegetation occur. Wetlands (willow riparian forest-disturbed and disturbed wetland) occur at the base of the remnant canyon in drainages that are located along the southern border of the site.

The majority of project development would occur within the previously disturbed area. Remedial grading would be required along the perimeter of the development area that would encroach into steep hillsides. Previous grading for the existing development pad had impacted portions of sensitive habitat in the canyon. Proposed grading in this area would impact 0.32 acre, which is less than 0.10 acre of the Diegan coastal sage scrub habitat. The City's policies and Biological Guidelines consider impacts less than 0.10 acre as not significant and do not require mitigation. The regraded slopes, outside of the building pad, would be replanted with native plant materials appropriate to the site and soil, including Diegan coastal sage scrub. No impacts would occur to wetlands habitat.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Sensitive animal species are those that are considered Federal or State threatened or endangered; MSCP Covered Species; or MSCP Narrow Endemic species. No sensitive animal species were found on-site. The database queries performed for the Biological Letter Report returned reports of three sensitive animal species in the vicinity, but none is considered to have potential to occur within the project impact footprint due to the existing development. They do have low to moderate potential to occur outside the impact footprint due to the presence of potential habitat in the canyon. These species include orange- throated whiptail (<i>Aspidoscelis hyperythra beldingi</i>; State watch list, MSCP Covered Species), pocketed free-tailed bat (<i>Nyctinomops femorosaccus</i>; State species of special concern), and big free-tailed bat (<i>Nyctinomops macrotis</i>; State species of special concern). However, the project would not impact sensitive species. Impacts would be less than significant.				
b) Have a substantial adverse effect on any riparian habitat or other community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
Refer to IV. a) above. Wetlands (willow riparian forest-disturbed and disturbed wetland) occur at the base of the remnant canyon in drainages that occur along the southern border of the site. No impacts would occur to wetlands habitat.				
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
Refer to IV. a) and b) above. No impacts would occur to wetlands habitat, including Federally protected wetlands as defined by Section 404 of the Clean Water Act.				
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
See IV. a) above. No formal and/or informal wildlife corridors are located on or near the project. Portions of a remnant canyon intrude into the project site on the south and west. However, the canyon is fully surrounded by urban development set atop mesa tops and does not connect to off-site habitat areas. No impacts would result.				
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree	☐	☐	☐	☒

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
preservation policy or ordinance?				

Refer to IV. a) above. The project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No impacts would result.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒
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Refer to IV. e) above. The project site is located within the Multiple Species Conservation Program (MSCP) San Diego Subarea Plan. However, the project site is not within or adjacent to a Multiple Habitat Planning Area (MHPA). No impacts would result.

V. CULTURAL RESOURCES – Would the project:

a) Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5?	☐	☐	☒	☐
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An Archaeological Resources Report Form was prepared by Red Tail Environmental (February 23, 2021) for the project, included as Appendix C. Red Tail Environmental conducted a review of the record searches and background research, which showed that the project area was developed by 1964. No archaeological resources have been previously identified within or adjacent to the project area. Due to the previous ground disturbance across the project development area and the few archaeological resources within the vicinity of the project area, the project area was recommended as having a low potential for subsurface archaeological resources and no further work was recommended.

Archaeological Resources

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 region has been inhabited by various cultural groups spanning 10,000 years or more.

A review of the record searches and background research show that the project site was developed by 1964. No archaeological resources have been previously identified within or adjacent to the project site. Due to the previous ground disturbance across the project development area and the few archaeological resources within the vicinity of the project site, the project site was determined to have a low potential for subsurface archaeological resources. Impacts to archaeological resources would be less than significant.

Built Environment

Three historic addresses have been previously recorded within the one-mile record search radius. None of the historic addresses are located within the project site. No impact to the built environment would result

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Refer to V. a) above.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | ☐ | ☐ | ☒ | ☐ |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Fossils (paleontological resources) are the remains and/or traces of prehistoric life and represent an important and nonrenewable natural resource. Impacts to paleontological resources may occur during grading activities associated with project construction where excavation would be done in previously undisturbed geologic deposits/formations/rock units. The project site is underlain by the Scripps Formation, which has a high sensitivity for paleontological resources. The City's CEQA Significance Determination Thresholds state if grading is greater than 1,000 cubic yards (CY) and 10 feet deep or greater in highly sensitive formations then a potential impact to paleontological resources could occur. Project implementation would involve 4,500 CY of cut at a maximum cut depth of 3.5 feet and 8,000 CY of fill at maximum depth of 8.5 feet. Based on this information the project would not meet the City's CEQA Significance Thresholds for impacts to paleontological resources, monitoring will not be required. Impacts would be less than significant.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| d) Disturb and human remains, including those interred outside of dedicated cemeteries? | ☐ | ☐ | ☐ | ☒ |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Refer to V.A. above, additionally no formal cemeteries or human remains are known to exist on-site or in the vicinity and there would be no impact to Native American or other human remains.

VI. ENERGY – Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | ☐ | ☐ | ☒ | ☐ |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

During project construction, the California Air Resources Board (CARB) regulates idling for commercial motor vehicles to reduce unnecessary consumption of energy under 13 CCR § 2485, *Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling*. Through implementation of this measure, energy consumption during construction would be less than significant.

The proposed residential development would not result in wasteful, inefficient, or unnecessary consumption of energy resources during operation. Energy usage may incrementally increase once residences are built and occupied; however, energy use would be commensurate with multi-family residential consumption and would not be excessive. The project would be required to meet energy standards of the current California Energy Code (Title 24). In addition, the project would be conditioned to meet building design measures per SDMC that incorporate energy conservation features (window treatments, efficient HVAC systems, etc.). The project would also be required to implement energy-reducing Climate Action Plan (CAP) strategies, such as the use of cool/green roofing materials. Energy impacts would be minimal and less than significant. See also Section VIII, Greenhouse Gas Emissions.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

See Section VIII, Greenhouse Gas Emissions. The City of San Diego's General Plan identifies the site as Residential. The General Plan's residential category allows for various densities of residential development. The project site is currently zoned RM-1-1 (multi-family, allowing one dwelling unit per 3,000 square feet). The project is consistent with the underlying zone and land use designation. As such, the project would be in compliance with all applicable State and local plans for renewable energy and/or energy efficiency, including the CAP. Because the project would not conflict with or obstruct the CAP, no impact would occur.

VII. GEOLOGY AND SOILS – Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | ☐ | ☐ | ☒ | ☐ |

A site-specific Preliminary Geotechnical Investigation was prepared by Advanced Geotechnical Solutions, Inc., May 15, 2020, as well as a project-specific Addendum to Geotechnical Report Addressing Cycle 1 Review Comments, prepared by Leighton and Associates, Inc., January 5, 2021, which are included as Appendix D. According to Geology of the San Diego Metropolitan Area, California, the project is assigned geologic risk category 52, which is characterized as other level areas, gently sloping to steep terrain, favorable geologic structure, low risk.

The site is located in the tectonically-active Southern California area, and will therefore likely experience shaking effects from earthquakes. The type and severity of seismic hazards affecting the site are to a large degree dependent upon the distance to the causative fault, the intensity of the seismic event, the direction of propagation of the seismic wave and the underlying soil characteristics. The seismic hazard may be primary, such as surface rupture and/or ground shaking, or secondary, such as liquefaction, seismically induced slope failure or dynamic settlement.

The State of California has mandated by the Alquist-Priolo Earthquake Fault Zoning Act (A-P) to delineate Fault-Rupture Hazard Zones in California. The project is not located in an A-P Zone. Redevelopment of the project site would be required to comply with seismic requirements of the California Building Code. Implementation of proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, would ensure that the potential for impacts from regional geologic hazards would be less than significant. Pursuant to project conditions of approval, the owner/permittee would be required to submit an updated geological investigation report or update letter to City staff for review and approval prior to project construction. The project would not result in a rupture of any known earthquake fault. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) Strong seismic ground shaking?	☐	☐	☒	☐

The site would be affected by seismic shaking as a result of earthquakes on major active faults located throughout the Southern California area. The nearest of active fault system, the Rose Canyon fault, lies approximately two miles to the west. Implementation of proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, would ensure that the potential for impacts from regional geologic hazards would be less than significant. Pursuant to project conditions of approval, the owner/permittee would be required to submit an updated geological investigation report or update letter to City staff for review and approval prior to project construction. The project would not result in strong seismic ground shaking. Impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
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Liquefaction is the phenomenon in which the buildup of excess pore pressures, in saturated granular soils due to seismic agitation, results in a temporary "quick" or "liquified" condition. Due to the lack of shallow groundwater, the potential for liquefaction is considered low. No impacts would result.

iv) Landslides?	☐	☐	☐	☒
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See VII. a) and VII. iii) above. Given the relatively flat gradients across the site and the competent nature of formational materials and recommended removal and recompaction of existing fill materials which will be exposed on the surrounding slopes, the potential for landsliding, and/or surficial instability onsite is considered to be remote. The project would not result in landslides. No impact would result.

b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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Construction of the project would temporarily disturb on-site soils during grading activities, thereby increasing the potential for soil erosion to occur. However, the use of standard erosion control measures and implementation of storm water best management practices (BMPs) requirements during construction would preclude impacts. The project would not result in substantial soil erosion or the loss of topsoil. Impacts would be less than significant.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
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Please see VII. a.) The project would be constructed consistent with proper engineering design, in accordance with the California Building Code. Utilization of appropriate engineering design measures and standard construction practices, to be verified at the building permit stage, would ensure that potential impacts from geologic hazards, such as on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse, would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐

Refer to VII. c). Expansive soils are characterized by their ability to undergo significant volume changes (shrink or swell) due to variations in moisture content. Changes in soil moisture content can result from precipitation, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors and may result in unacceptable settlement or heave of structures or concrete slabs supported on grade. Based on our laboratory testing, it is anticipated that the expansion potential of the onsite materials will generally be "Very Low" to "Low", however, "Medium" expansion potential soils may exist in discreet lenses within the Scripps Formation. The project would be required to comply with seismic requirements of the California Building Code that would reduce impacts to people or structures due to local seismic events to an acceptable level of risk. Project construction would follow recommendations contained in the Preliminary Geotechnical Investigation. Implementation of proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, would ensure that the potential for impacts from regional geologic hazards would be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
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The project site would be served by an existing public sewer system. The project would not involve the use of septic tanks or alternative wastewater disposal systems. No impacts would occur.

VIII. GREENHOUSE GAS EMISSIONS – Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
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In December 2015, the San Diego City Council adopted a Climate Action Plan (CAP) that outlines the actions that the City will undertake to achieve its proportional share of State greenhouse gas (GHG) emission reductions. Analysis of GHG emissions and potential climate change impacts from new development is required under CEQA. The CAP is a plan for the reduction of GHG emissions in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP.

The City Council approved the CAP Consistency Checklist in July 2016, and the Checklist was subsequently updated June 2017. The purpose of the CAP Consistency Checklist is to, in conjunction with the CAP, provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA. The CAP Consistency Checklist is part of the CAP and contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. Implementation of these

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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measures would ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets. The completed CAP Consistency Checklist for the project is located in Appendix E.

As presented in the project's CAP Consistency Checklist, the project is consistent with Item "A" under Step 1, which applies to projects that are consistent with the existing land use plan and zoning designations. For consistency with Step 1, Item A, CAP strategies outlined in Step 2 of the CAP that are applicable to the project must also be met. The project's CAP Consistency Checklist documents how the project would implement CAP strategy actions. In summary, the project would utilize cool roofing materials, low-flow fixtures/appliances, and garages equipped with conduits and breakers on the house electrical panels to accommodate future EV chargers.

Based on the project's consistency with the City's CAP Consistency Checklist, the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project's direct and cumulative GHG emissions would have a less than significant impact on the environment.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | ☐ | ☐ | ☐ | ☒ |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Refer to VIII. a), above. No impacts would result.

IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials? | ☐ | ☐ | ☒ | ☐ |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project would redevelop portions of the project site with multi-family residential buildings with associated amenities. During project construction, small amounts of solvents and petroleum products could be utilized; although minimal amounts of such substances may be present during construction, they are not anticipated to result in a significant hazard to the public. During the operational phase of the project, the routine transport, use or disposal of hazardous materials is not anticipated. Although small amounts of hazardous materials may be used for cleaning and maintenance, standard best management practices (BMPs) would be applied to ensure that all hazardous materials are handled and disposed of properly and that no hazards would result during the long-term operation of the project. Hazardous materials and waste would be managed and used in accordance with all applicable Federal, State, and local laws and regulations. Therefore, the project would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of | ☐ | ☐ | ☐ | ☒ |
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
hazardous materials into the environment?				
Refer to IX. a). The project would redevelop the project site with multi-family residential buildings and associated amenities. During project construction, small amounts of solvents and petroleum products could be utilized; although minimal amounts of such substances may be present during construction, they are not anticipated to result in a significant hazard to the public. During the operational phase of the project, the routine transport, use or disposal of hazardous materials is not anticipated. As such, the project would not require the routine transport, use, or disposal of hazardous materials. Therefore, the project does not have the potential to release hazardous materials into the environment. No impacts would result.				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
The closest primary and/or secondary schools to the project site are Whittier, an alternative school located across the street from the site, and Marston Middle School, located approximately four-tenths of a mile north of the site. Although the project is located within one-quarter mile of an existing school (Whittier), the project is not anticipated to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste, as the proposed use is residential. No impact would occur.				
d) 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, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
A site-specific Phase I Environmental Site Assessment Report (ESA) was prepared by Partner Engineering and Science, Inc., January 31, 2020, included as Appendix J. The ESA did not identify any hazardous substances or petroleum products in, on, or at the property (i.e., a recognized environmental condition or REC). Additionally, the project site has not been identified as a hazardous materials site pursuant to Government Code Section 65962.5. Therefore, the project would not create a significant hazard to the public or the environment. No impacts would occur.				
Due to the age of buildings located on the project site, the ESA identified the potential that asbestos-containing materials (ACMs) and/or lead-based paint (LBP) are present. Building demolition would follow regulatory guidelines and laws in place, as well as state-of-the-industry practices, to protect workers and others involved in construction of the project, such that health risks would be avoided.				
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two mile of a public airport or public use airport, would the project result	☐	☐	☐	☒

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
in a safety hazard for people residing or working in the project area?				

The basic function of ALUCPs (or Airport Land Use Compatibility Plans) is to promote compatibility between airports and the land uses.

The project site is located approximately 5.5 miles west of Montgomery-Gibbs Executive Airport and is within the Airport Influence Area (AIA) Review Area 2, as shown in the Montgomery Field ALUCP maps. Since the project site is within AIA Review Area 2, the project was not required to submit to the San Diego County Regional Airport Authority, serving as the Airport Land Use Commission (ALUC) for a consistency determination. The project site is within the FAA Part 77 noticing area. The FAA has issued Determination of No Hazard letters, confirming that the project would not be a hazard to air navigation. As such, the project would not be expected to result in a safety hazard for people residing or working in the project area. No impact would result.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
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The project site is not located within the vicinity of a private airstrip. No impact would result.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
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The project would occur within an urbanized portion of the community on a site that is already fully developed. No change to the existing circulation network would occur.

In addition, a *Fire Access Plan*, included as Figure 5, was prepared for the project to ensure adequate access points for emergency services. This plan shows the location of all fire hydrants in the immediate area of the project site, aerial ladder access at various points on the building, measurements for minimum hose pull length required to access certain areas on the project site, and the width of the nearest access roads and turn lanes.

The project would not impair or physically interfere with the implementation of an adopted emergency response plan or emergency evacuation plan. No impact would result.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒
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The project site is adjacent to native/naturalized vegetation and a brush management plan is included as part of the project plans. The project complies with SDMC Section 142.0412, Brush Management

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Regulations. The project's alternative compliance measure is proposed to be a six-foot-tall minimum solid wall between Zone 1 and Zone 2. The project's proposed retaining walls, which range in height from six feet to 14 feet, would provide this alternative compliance. No impact would result.

X. HYDROLOGY AND WATER QUALITY - Would the project:

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Violate any water quality standards or waste discharge requirements? | ☐ | ☐ | ☒ | ☐ |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

A site-specific Storm Water Quality Management Plan (SWQMP) and Drainage Study were prepared by Rick Engineering Company, April 8, 2021, and January 22, 2021, respectively. The SWQMP and Drainage Study are included as Appendix F and Appendix G, respectively.

The project is required to comply with all storm water quality standards during and after construction, and Best Management Practices (BMPs) (Site Design, Source Control, and Structural BMPs). Potential impacts to existing water quality standards associated with the multi-family residential development would include minimal short-term construction-related erosion/ sedimentation and no long-term operational storm water discharge. Conformance to BMPs outlined in the SWQMP and conformance with the City's Storm Water Standards would prevent or effectively minimize short-term water quality impacts. Therefore, the project would not violate any existing water quality standards or discharge requirements. Impacts would be less than significant.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | ☐ | ☐ | ☐ | ☒ |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would not require the construction of wells or the use of groundwater. Furthermore, the project would not introduce significant new impervious surfaces that could interfere with groundwater recharge, as the site is already fully developed with predominantly impervious surfaces. Therefore, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. No impact would result.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site? | ☐ | ☐ | ☒ | ☐ |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
See X. a). There are no streams or rivers within the project boundary. Additionally, per the project SWQMP, the project would utilize multiple storm water discharge locations to mimic the existing drainage pattern on-site. Therefore, the project would not substantially alter any existing drainage patterns of the site or area or result in substantial erosion on- or off-site. Impacts would be less than significant.				
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?	☐	☐	☒	☐
See X) c). As presented in the Drainage Study, the overall drainage characteristics in the post-project condition would remain similar as compared to the pre-project conditions. While the project would result in a slight increase to impervious surfaces, the project as a whole would not result in an increase in storm water runoff. It is not anticipated that the project would adversely impact the hydraulics of existing drainage systems located downstream of the project. The project would also include LID BMPs and Pollutant Control BMPs that would further reduce/slow runoff for post- project conditions. The project would not result in the alteration of the course of a stream or river, as none are present on-site. Impacts would be less than significant.				
e) Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
Refer to X. a). through X. d) above. The project was reviewed by City staff that determined the project would not exceed the capacity of the existing storm sewer system. On-site low impact design (LID) BMPs and integrated management practices (IMP) would be implemented to control peak runoff from the proposed development. Adherence with the standards would preclude a cumulatively considerable contribution to water quality. The project would not exceed the capacity of the existing or planned storm water drainage system. Impacts would be less than significant.				
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
Refer to X. a) above. The project would implement LID and source control and treatment control BMPs as required by the City's Storm Water Standards. Source control BMPs would include on-site storm drain inlets, interior floor drains and elevator shaft sump pumps, indoor and structural pest control, outdoor pesticide use, and fire sprinkler test water. Adherence to the standards would preclude a cumulatively considerable contribution to water quality and would not substantially degrade water quality. Impacts would be less than significant.				
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or	☐	☐	☐	☒

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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other flood hazard delineation map?

According to a Federal Emergency Management Agency (FEMA) flood insurance rate map (FEMA, 2012), the project site is not located in a 100-year flood hazard area. No impacts would result.

h) Place within a 100-year flood hazard area, structures that would impede or redirect flood flows?	☐	☐	☐	☒
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Refer to X. a) above. No impacts would result.

XI. LAND USE AND PLANNING – Would the project:

a) Physically divide an established community?	☐	☐	☐	☒
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The project involves redevelopment of a previously developed site located in an urban neighborhood. The project would utilize existing right-of-way and roadways. The project would not physically divide the community. No impact would result.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
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Construction of the project would be consistent with the underlying zone and land use designation. The project site is zoned RM-1-1, allowing for multi-family residential development with a minimum 1,500 square feet of lot area per unit. In order to provide for geotechnical site stability, the project requires construction of retaining walls, which exceed Land Development Code requirements, requiring a deviation to code requirements. Specifically, the project proposes retaining walls up to 14 feet three inches in height, where code requirements limit the height of walls to 12 feet. Retaining walls would occur along the south and west perimeters of the development area, as well along a portion of the northern property line. The walls are a distance from public views and would not be readily discernable. Additionally, dense vegetation that occurs in the south and west portions of the project site, which would not be disturbed by development, further screen views of retaining walls. Thus, the deviation does not result in significant environmental effects. Impacts would be less than significant.

The project is consistent with the land uses and development intensity of the underlying zone. The project site is located within the Clairemont Mesa Community Plan area. The Clairemont Mesa Community Plan identifies the project site as Low-Medium Residential (10-15 du/ac). The project proposes multi-family residential development consistent with this land use designation and recommended density range. No impact would result.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

Refer to IV. f) above. No impacts would result.

XII. MINERAL RESOURCES – Would the project?

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
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The project site is located in an urban neighborhood surrounded by existing development. There are no known mineral resources located on the project site. The site is not large enough to allow economically feasible mining operations. The project would not preclude a mining operation adjacent to or surrounding the site. The site and surrounding properties do not contain any known mineral resources that would be of value to the region. No impact would result.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒
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Refer to XII. A) above. The project area has not been delineated on a local General Plan, Community Plan, specific plan, or other land use plan as a locally important mineral resource recovery site, and no such resources would be affected with project implementation. The project would not result in the loss of availability of a local important mineral resource recovery site. No impact would result.

XIII. NOISE – Would the project result in:

a) Generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
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A Noise Study (November 30, 2020) was prepared by dBF Associates, Inc. for the project. The Noise Study is included in Appendix H.

Construction Noise

The primary noise source from project construction would be from site preparation. Grading could require the use of heavy equipment such as bulldozers, loaders, and scrapers. No blasting would be necessary. Haul trucks could be used to import/export fill to/from the project site.

Construction of the project would generate a short-term temporary increase in noise in the project area. The increase in noise level would be primarily experienced close to the noise source. The magnitude of the impact would depend on the type of construction activity, noise level generated by various pieces of

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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construction equipment, duration of the construction phase, acoustical shielding, and distance between the noise source and receiver. Construction activity and delivery of construction materials and equipment would be limited to between 7:00 a.m. and 7:00 p.m., except on Sundays or holidays. The project would be required to obtain a traffic control permit prior to any work within the public right-of-way.

This project would implement conventional construction techniques and equipment. Standard equipment such as scrapers, graders, backhoes, loaders, tractors, cranes, and miscellaneous trucks would be used for construction of most project facilities. Sound levels of typical construction equipment range from approximately 65 to 95 dBA at 50 feet from the source. Worst-case noise levels are typically associated with grading.

The closest occupied residential properties are located adjacent to the project site on the south and west. Construction of the project would produce noise levels ranging from approximately 63 to 75 dBA Leq (12 hours) at the property lines of the residences. Construction would occur during the days and hours proscribed by the City of San Diego Municipal Code. Construction noise levels at residential property lines would not exceed the 75 dBA Leq (12 hour) sound level allowed by the City of San Diego Municipal Code. Project construction noise impacts would be less than significant.

Long Term Operational Noise Exposure

Traffic Noise Affecting the Project Site

Sound levels caused by line sources (i.e., variable or moving sound sources such as traffic) generally decrease at a rate of 3 to 4.5 dBA when the distance from the road is doubled, depending on the ground surface hardness between the source and the receiving property. The model assumed "hard soil" propagation conditions, which corresponds to a drop-off rate of approximately 3 dBA per doubling of distance. The actual sound level at any receptor location is dependent upon such factors as the source-to-receptor distance and the presence of intervening structures (walls and buildings), barriers, and topography. The noise attenuating effects of changes in elevation, topography, and intervening structures were not included in the model. Therefore, the modeling effort is considered a worst-case representation of the roadway noise.

There are three common open space areas in the project: The paseo south of Buildings 2 and 3; the paseo west of Building 4; and the courtyard between Buildings 5, 6, and 7. Noise levels on the project site would range from below 60 dBA CNEL at the western buildings to approximately 70 dBA CNEL at the eastern façades. Noise levels in the paseos and courtyard would be less than 65 dBA CNEL. Therefore, the impact of traffic noise affecting the outdoor areas of the project site would be less than significant.

Interior Noise

Because future exterior noise levels would exceed 60 dBA CNEL at some Building 1 and Building 8 façades, interior noise levels in habitable rooms could exceed the City of San Diego General Plan Noise Compatibility Guidelines and CBC Section 1206.4 (Title 24) requirement of 45 dBA CNEL in residences. To comply with this requirement and meet Title 24 requirements, upgraded building façade elements (windows, walls, doors, and/or exterior wall assemblies) with Sound Transmission Class (STC) ratings of 35 or higher may be necessary for Building 1 and Building 8. If the interior noise limit can be achieved only with the windows closed, the building design must include mechanical ventilation that meets CBC requirements.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Implementation of these measures would ensure that interior noise levels would be 45 dBA CNEL or below in residences, and the project would comply with the City of San Diego General Plan Noise Compatibility Guidelines and the CBC Section 1206.4 requirement. The project would result in a less than significant interior noise impact with project features incorporated in accordance with the interior noise analysis.

Project Generated Traffic

The project would generate a net ADT increase of 240 vehicles on Clairmont Drive. This increase would result in a negligible traffic noise increase. The impact of project-generated traffic noise would be less than significant.

Operational (Non-construction) Noise

The project buildings are expected to have rooftop HVAC units. There would be one unit per residence. It was assumed that the units would be screened with parapet walls at least as tall as the units. The unit sizes are not currently specified; however, it was assumed that three-ton units would be used. A typical three-ton HVAC condenser produces a sound power level of approximately 68 to 76 dBA.

The project would produce operational noise levels of approximately 33 dBA Leq at the property lines of the residences to the east, approximately 33 to 39 dBA Leq at the property lines of the residences to the south, 33 to 38 dBA Leq at the property line of the church to the north, 31 to 39 dBA Leq at the property line of the church to the south, and 32 to 36 dBA Leq at the west property line, toward the school.

Project operation would not exceed the property line sound levels allowed by the City of San Diego Municipal Code. Project operation noise impacts would be less than significant.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Generation of, excessive ground borne vibration or ground borne noise levels? | ☐ | ☐ | ☒ | ☐ |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Activities associated with residential use do not generate vibration. Temporary vibration could occur during construction when pile driving and/or blasting would occur. No blasting would be necessary for project construction. Additionally, the project would comply with the City's Noise Ordinance as applicable and would not result in the generation of excessive ground borne vibration or ground borne noise levels. Vibration impacts would be less than significant.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | ☐ | ☐ | ☒ | ☐ |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Existing ambient noise levels in the project vicinity were found to be 67.2 dBA. Substantial increases in ambient noise levels would not result because the proposed uses on-site are consistent with uses present in the surrounding area. Any ambient noise emanating from the project would be typical of that associated with an urban neighborhood, such as people talking or sound traveling from outdoor areas. Therefore, no substantial increase in ambient noise levels is anticipated. Impacts would be less than significant.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity | ☐ | ☐ | ☒ | ☐ |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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above existing without the project?

Refer to XIII. a).

- e) For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport would the project expose people residing or working in the area to excessive noise levels?

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Montgomery-Gibbs Executive Airport is the nearest airport to the project site, located approximately five miles east of the project site. Based on the noise contour maps provided in the Montgomery Field Airport ALUCP, the project site is located outside the 60 dBA noise contours (CNEL) and is not affected by airport noise. As such, the project site is not subject to noise policies of any adopted ALUCP and would not be exposed to excessive aircraft noise or expose people residing or working in the area to excessive noise levels. No impact would result.

- f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

☐
☐
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The project site is not located within vicinity of a private airstrip. No impact would result.

XIV. POPULATION AND HOUSING – Would the project:

- a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

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The project proposes the development of a 40-unit multi-family townhome project, which is consistent with the existing land use designation and zoning. The project does not require the extension of roads or services, as the project is an in-fill project located within an existing urban community. The project would not induce growth, it would not open up a new area for development; however, the project would provide infill development in an established community. The provided housing may reduce vehicle miles travelled for commuters within the general urban core of San Diego by providing additional housing in this location.

Therefore, the project would not induce substantial population growth in the area. No impact would result.

- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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There are no residential buildings currently on the project site. The project proposes to redevelop the site with a 40-unit multi-family townhome development where non-residential uses are currently developed. As such, no existing housing would be displaced and the project would not require the construction of replacement housing elsewhere. No impact would result.

- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

☐
☐
☐
☒

There are no residential buildings currently on the project site. The project proposes to redevelop the site with a 40-unit multi-family townhome development where non-residential uses are currently developed. As such, no people would be displaced and the project would not require the construction of replacement housing elsewhere. No impact would result.

XV. PUBLIC SERVICES

- a) Would the project result in substantial adverse physical impacts associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service rations, response times or other performance objectives for any of the public services:

- i) Fire Protection

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The project site is located in an urbanized area where fire protection services are already provided. Fire protection services would be provided by Fire Stations 27, 36, and 25. San Diego Fire-Rescue Department Station 27 is located approximately three miles to the north of the project site; Station 36 is located approximately three mile to the northeast of the project site; Station 25 is located approximately two miles to the south of the project site. The project would not adversely affect existing levels of fire protection services to the area and would not require the construction of new or expanded governmental facilities. Impacts to fire protection would be less than significant.

- ii) Police Protection

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☐
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☐

The project site is located in an urbanized area where police protection services are already provided. The project site would be served by the Northern Division of the San Diego Police Department. The project would not adversely affect existing levels of police protection services to the area and would not require the construction of new or expanded governmental facilities. Impacts to police protection would be less than significant.

- iii) Schools

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☐
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The project involves the development of a 40-unit multi-family townhome development. Residents could have school-aged children that could attend San Diego Unified School District (SDUSD) schools. Schools that serve the project site include Toler Elementary School, Marston Middle School, and Clairemont High School. The increase in enrollment from the project would not be substantial.

Redevelopment of the project site would be served by existing educational facilities in the community for school aged children and would not significantly increase the demand on existing public schools over that which currently exists. The project would not generate or require the construction of new or altered educational facilities. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
v) Parks	☐	☐	☒	☐

The project involves the development of a 40-unit multi-family townhome development. As presented in the Clairemont Mesa Community Plan, there is a community park located immediately northeast of the project site. This community park includes South Clairemont Recreation Center and Clairemont Swimming Pool. The YMCA Krause Family Skate and Bike Park is located immediately south of the community park complex.

The project would increase the use of existing parks, as the project would generate new population. Pursuant to project conditions of approval, prior to the issuance of the first residential building permit, the Owner/Permittee shall pay a park in-lieu fee for park and recreation facilities in the Clairemont Mesa community. The park portion of the current per-unit Development Impact Fees (fees that are assessed to implement the City's General Plan, which contains policies related to the maintenance of an effective facilities financing program to ensure the impact of new development is mitigated through appropriate fees), to be paid at the time of building permit issuance, provides for public facilities required to support the proposed population. Impacts would be less than significant.

vi) Other public facilities	☐	☐	☐	☒
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The project site is located in an urbanized area where City services are already provided. The proposed multi-family development would not adversely affect existing levels of facilities to the area and would not require the construction of new or expanded governmental facilities. No impacts to other public facilities would occur.

XVI. RECREATION

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
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The project could increase the use of existing parks or recreational facilities, as the project would generate new population. However, the increase in use would not result in substantial physical deterioration of existing community recreational facilities or the need for construction of new facilities. In addition, pursuant to project conditions of approval, prior to the issuance of the first residential building permit, the Owner/Permittee shall pay a park in-lieu fee for park and recreation facilities in the Clairemont Mesa community. The park portion of the current per-unit Development Impact Fees (DIF) provides for public facilities required to support the proposed population. (DIF are fees paid at the time of building permit issuance and assessed to implement the City's General Plan policies related to the maintenance of an effective facilities financing program to ensure the impact of new development is mitigated through appropriate fees.) Impacts would be less than significant.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project involves the development of a 40-unit multi-family townhome project and would not include the construction of recreational facilities. Additionally, the project would not require the construction or expansion of recreational facilities. No impacts would result.

XVII. TRANSPORTATION/TRAFFIC – Would the project?

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) 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? | ☐ | ☐ | ☒ | ☐ |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project would not adversely affect any mode of transportation in the area. The project would not conflict with any applicable congestion management program, level of service standards, or travel demand measures. Impacts are considered less than significant.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Would the project or plan/policy result in VMT exceeding thresholds identified in the City of San Diego Transportation Study Manual? | ☐ | ☐ | ☒ | ☐ |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The City of San Diego Transportation Study Manual does not require a vehicles miles traveled transportation impact study for projects that conform to the Community Plan and generate less than 300 average daily traffic (ADT). The expected trip generation for the proposed 40 residential units is 240 ADT, based on a rate of six trips per dwelling unit. The project is not expected to substantially adversely affect the performance of surrounding street segments and intersections. Therefore, the project would not conflict with the applicable City of San Diego regulations establishing thresholds of effectiveness for the circulation system around the project site. Less than significant impact would result.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) 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)? | ☐ | ☐ | ☒ | ☐ |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Access points to the project site have been designed consistent with the City's engineering standards, and would not create a hazard for motorcycles, bicycles, or pedestrians entering or exiting the site. The project would not include any design features or incompatible uses that could create a hazard to the public. No significant impacts would result.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| d) Result in inadequate emergency access? | ☐ | ☐ | ☐ | ☒ |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Project design is subject to City review and approval for consistency with all design requirements for emergency access. A Fire Access Plan was prepared for the project to ensure adequate access points for emergency services. This plan shows the location of all fire hydrants in the immediate area of the project site, aerial ladder access at various points on the building, measurements for minimum hose pull length

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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required to access certain areas on the project site, and the width of the nearest access roads and turn lanes. The project was reviewed and approved by the City's Fire Plan staff. No impacts would result.

XVIII. TRIBAL CULTURAL RESOURCES- Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | ☐ | ☐ | ☐ | ☒ |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

Refer to V(a). The project would not cause a substantial adverse effect to tribal cultural resources, as there are no recorded sites listed or sites eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined by the Public Resources Code Section 5020.1(k). No impact would result.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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. | ☐ | ☐ | ☐ | ☒ |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Tribal Cultural Resources include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Native American Tribe. Tribal Cultural Resources 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 (PRC § 21080.3.1(a)).

Assembly Bill 52 (AB 52) requires as part of CEQA, evaluation of tribal cultural resources, notification of tribes, and opportunity for tribes to request a consultation regarding impacts to tribal cultural resources when a project is determined to require a Negative Declaration, Mitigated Negative Declaration or Environmental Impact Report under CEQA.

The City of San Diego, as Lead Agency, determined that Tribal Cultural Resources pursuant to subdivision Public Resources Code Section 5024.1(c) would not be potentially impacted through project implementation, as the project site has been developed and is located within an urban area. In accordance with the requirements of Assembly Bill (AB) 52, the City of San Diego initiated AB 52 Notification on May 7, 2020, to Lipay Nation of Santa Ysabel, and Jamul Indian Village, and on January 5, 2021, AB 52 Notification

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was sent to San Pasqual Band of Mission Indians via email correspondence. EAS received email correspondence by Tribal Representatives that they had no further concerns for potential impacts to Tribal Cultural Resources, and consultation was closed on this project. No impacts would occur to Tribal Cultural Resources.

XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | ☐ | ☐ | ☒ | ☐ |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Adequate municipal sewer services are available to serve the project. Wastewater would not be treated on-site. The project would not exceed wastewater treatment requirements. Impacts would be less than significant.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | ☐ | ☐ | ☒ | ☐ |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Refer to XIX.a., above.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | ☐ | ☐ | ☐ | ☒ |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Two new storm drains would be constructed on-site to accommodate storm water run-off from the development area. Storm water runoff from the development area of the project site would be intercepted and conveyed by the proposed storm drains to an underground vault and Modular Wetland System combination to be treated for water quality and hydromodification. Ultimately, flows would outlet to the toe of slopes of westerly and southerly undeveloped hillside via 18-inch storm drain type outfalls. Rip-rap energy dissipators are being proposed to minimize erosion along the undeveloped steep hillside. The new storm drains would be constructed in accordance with City standards. No significant impacts would result.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | ☐ | ☐ | ☒ | ☐ |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

According to the CEQA Significance Determination Thresholds, a Water Supply Assessment (WSA) was not required for the project, as the project would not result in the construction of 500 or more residential units or development in excess of 500,000 square feet of commercial retail space. Adequate water entitlements and resources are available to serve the residential project. The project would not require the expansion of water supply entitlements. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

Refer to XIX. a) above. The project was reviewed by Public Utilities staff, who determined that adequate services are available to serve the site. Impacts would be less than significant.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
--	--------------------------	--------------------------	-------------------------------------	--------------------------

The City of San Diego has established a threshold stating that projects that include the construction, demolition, and/or renovation of 40,000 square-foot or more of building space may generate approximately 60 tons of waste or more and are considered to have cumulative impacts on solid waste facilities. The project exceeds this threshold and prepared a Waste Management Plan (WMP) to identify measures that would be implemented to reduce potential solid waste impacts such that significant impacts are avoided. A Waste Management Plan was prepared by KLR Planning (May 2021), and is included in Appendix J. The WMP identified measures (such as including landscaping to reduce yard waste, utilizing sustainable design features and complying with the voluntary measures in the California Green Building Standards Code relative to cool/green roofs, or targeting 20 percent of solid waste to be recycled) that would be implemented to reduce potential solid waste impacts such that significant impacts are avoided.

Debris and waste generated by demolition and construction for the project would be managed under the City's Construction and Demolition (C&D) Debris Diversion Deposit Program. This ordinance requires that the applicant post a deposit, which is not returned until the applicant demonstrates that a specified amount of the material generated by the work has been diverted from disposal in landfills. The project would be required to adhere to the City's waste generation reduction requirements. All solid waste from the project site would be transported through contract with a private hauler to an appropriate facility, which would have adequate capacity to accept the waste generated by the project. The commercial facilities on the project would be required to comply with the requirements of the City's Recycling Ordinance (SDMC Section 66.0701 et. seq), applicable to recycling by commercial facilities. Impacts would be less than significant.

g) Comply with federal, state, and local statutes and regulation related to solid waste?	☐	☐	☒	☐
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Refer to XIX. f) above. In 1989, the California Legislature passed Assembly Bill (AB) 939: Integrated Waste Management Act, which mandated that all cities reduce waste disposed in landfills from generators within their borders by 50 percent by the year 2000. AB 939 required all local governments to prepare a Source Reduction and Recycling Element, which incorporates waste management policies and programs to achieve the mandated waste reduction. Since 1990, the City has diverted more than 50 percent of its generated waste stream from disposal. This bill specified that solid waste should be considered by the equation $\text{GENERATED} = \text{DISPOSED} + \text{DIVERTED}$. "Diverted" materials are put into a *hierarchy* in the law, as follows:

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
- First <i>source reduction</i>, such as using a reusable bag, making double-sided copies, or other measure that stops waste at the source. - Secondary measures include <i>recycling</i> and <i>composting</i>. Because these measures often have transportation and processing impacts, they are considered less preferable than source reduction. - In the Public Resources Code, various methods of <i>transformation</i> for energy production are limited to ten percent of the total waste reduction target.				

In 2008, Senate Bill (SB) 1016 was chaptered. Known as the Solid Waste Disposal Measurement Act, SB 1016 maintained the 50 percent diversion requirement, but changed to a disposal-based measurement system, expressed as the 50 percent Equivalent Per Capita Disposal Target. This built upon AB 939 by implementing a simplified and timelier indicator of jurisdiction performance that focuses on reported disposal at Board-permitted disposal facilities. This established a goal not of recycling more, but disposing of less. AB 341: Jobs and Recycling, chaptered in 2011, was intended to create green jobs by expanding recycling to every multi-family dwelling and business. It charged CalRecycle with responsibility for ensuring that the State is diverting at least 75 percent of solid waste that is generated within the State by 2020. SB 1016 establishes that compliance with State law is measured by reducing the amount of waste material requiring disposal, and AB 341 increases the diversion target to 75 percent.

Additional local regulation pertaining to solid waste management includes the City of San Diego's Municipal Code Ch.14 Art. 2 Div. 8: §142.0810, §142.0820, Ch. 6 Art. 6 Div. 7; §66.0706, §66.0709, §66.0710; and Ch. 6 Art. 6 Div. 6; §66.0711, §66.0604, §66.0606. These statutes designate refuse and recycling space allocation requirements for:

- on-site refuse and recyclable material storage requirements,
- diversion of construction and demolition debris regulations, and
- diversion of recyclable materials generated from residential facilities, businesses, commercial/institutional facilities, apartments, condominiums, and special events requiring a City permit.

The City Recycling Ordinance is found in Municipal Code section 66.0701 et. seq. It requires the provision of recycling service for all single-family residences; and commercial facilities and multi-family residences with service for four cubic yards or more. In addition, the ordinance also requires development of educational materials to ensure occupants are informed about the City's ordinance and recycling services including information on types of recyclable materials accepted.

C&D Debris Diversion Deposit Program applies to all applicants for building, demolition, and removal permits. This ordinance requires that the applicant post a deposit that is not returned until the applicant demonstrates that a minimum amount of the material generated has been diverted from disposal in landfills. Mixed construction debris recycling facilities in San Diego are evaluated quarterly to determine how much of the production material is recycled, and how much is a "residual" material requiring disposal. Facilities that accept mixed debris typically achieve a 68 percent or less diversion rate. Single materials recyclers, such as metal recyclers, often achieve a nearly 100 percent diversion rate. When comingled materials are sent to a mixed facility, the 75 percent diversion goal established by AB 341 will not be met. Depending on the project, to ensure that the overall diversion goal is attained, some materials must often be separated and trucked to facilities with higher diversion rates, such as aggregate and metal recyclers.

Demolition, grading, and construction for the project would occur over a period of 18 to 22 months. The demolition phase would generate approximately 2,230.92 tons of waste. Approximately 2,139.49 tons, or

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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approximately 96 percent, of waste generated by demolition would be recycled. Implementation of the project proposes 4,500 cy of cut and 8,000 cy of fill; approximately 3,500 cy of materials would be imported and no materials would be exported. As concluded in the Waste Management Plan, the project would implement a target of 20 percent recycled material and 75 percent for landfill diversion with a total diversion of approximately 89 percent of the construction waste generated by the project.

During occupancy, the expected generated waste per year from the project when fully occupied would be approximately 48 tons. On-site recycling services shall be provided to all tenants and residents within the project. Landscape maintenance would include the collection of green waste and recycling of green waste at recycling centers that accept green waste. This would help further reduce the waste generated by developments within the project during occupancy.

As such, the project would comply with Federal, State, and local statutes relative to solid waste. Impacts would be less than significant.

XX. WILDFIRE – Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☒ | ☐ |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The 2017 San Diego County Multi-Jurisdictional Hazard Mitigation Plan (SDHMP) is the San Diego region's plan toward greater disaster resilience in accordance with section 322 of the Disaster Mitigation Act of 2000. The project would not conflict with the goals, objectives, and actions of the SDHMP. The project site is in a previously developed area, with existing public service infrastructure serving the site. In addition, the project was reviewed by the City Fire Department, and the project meets fire access requirements. No negative impact to ingress and egress on adjacent streets would result. Therefore, the project would not substantially impair an adopted emergency response or evacuation plan. Impacts would be less than significant.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of wildfire? | ☐ | ☐ | ☒ | ☐ |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project is located in a Very High Fire Severity Zone. The project is subject to brush management regulations and would implement Brush Management Zone 1 (with alternative compliance) and Zone 2 in accordance with the brush management regulations. Brush Management Zone 1 extends from the habitable structure towards flammable vegetation and occurs on the level portion of the property. The project would implement alternative compliance in the form of a fire management wall, which be a six-foot-tall minimum solid wall between Zone 1 and Zone 2. The project's proposed retaining walls, which range in height from six feet to 14 feet, would provide this alternative compliance. Zone 1 ends at the fire management wall. Brush Management Zone 2 is the remaining 65 feet that extends beyond Zone 1's fire management wall. Impacts would be less than significant.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that | ☐ | ☐ | ☒ | ☐ |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
may result in temporary or ongoing impacts to the environment?				
See XX a) and b). The site is in an urban residential neighborhood with existing infrastructure that would serve the project after construction. No new construction of roads, fuel breaks, emergency water sources, power lines, or other utilities would be required that would exacerbate fire risk. Therefore, impacts would be less than significant.				
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐
See XX a). The project site is relatively flat. Most of the project's development area is within developed land with limited amount of vegetated land cover. The project proposes redevelopment of the site to include townhomes, parking areas, and resident amenities. Landscaped areas would consist of a mixture of California natives and drought-tolerant plant species that would be permanently irrigated vegetation. The proposed facilities intended to manage runoff from the site include appropriate grading of pads to direct runoff away from structures on the site, as well as a private storm drain system. The project would not expose people or structures to significant risk from flooding or landslide as a result of runoff, post-fire instability, or drainage changes. Impacts would be less than significant.				
XXI. MANDATORY FINDINGS OF SIGNIFICANCE –				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
The project would redevelop a previously developed site. The project site includes sensitive habitat (Diegan coastal sage scrub, willow riparian forest-disturbed, and disturbed wetland). A small amount of grading (0.32 acre) would occur in Diegan coastal sage scrub habitat in order to stabilize slopes along the perimeter of the previously disturbed development area. Grading in this area would impact less than 0.10 acre of the Diegan coastal sage scrub habitat, which would not be regarded as a significant impact based on City policies and Biological Guidelines and no mitigation would be required. No impacts would occur to wetlands habitat.				
The project site does not contain historical resources. Thus, proposed redevelopment of the project site with townhomes and associated improvements would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce				

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. The project would not have the potential to result in significant impacts to paleontological or historical resources. Impacts would be less than significant.				
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable futures projects)?	☐	☐	☒	☐
The project would not have the potential to result in cumulatively considerable environmental effects. The project would not have any impacts on biological or cultural resources. The project would be consistent with the SIP, AQMP, and RAQS, and would not contribute air emissions that have the potential to degrade local air quality. The project would not have the potential to result in noise impacts. Therefore, the project would not have any impacts, even taking past, current, and future projects into consideration. Impacts would be less than significant.				
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐
Construction and operation of the project as proposed would not cause environmental effects that would significantly directly or indirectly impact human beings. Impacts would be less than significant.				

INITIAL STUDY CHECKLIST REFERENCES

I. Aesthetics / Neighborhood Character

- ☒ City of San Diego General Plan.
- ☒ Community Plans: Clairemont Mesa Community Plan, 1989

II. Agricultural Resources & Forest Resources

- ☐ City of San Diego General Plan
- ☒ U.S. Department of Agriculture, Soil Survey - San Diego Area, California, Part I and II, 1973
- ☐ California Agricultural Land Evaluation and Site Assessment Model (1997)
- ☐ Site Specific Report:

III. Air Quality

- ☐ California Clean Air Act Guidelines (Indirect Source Control Programs) 1990
- ☒ Regional Air Quality Strategies (RAQS) - APCD
- ☒ Site Specific Report: Air Quality Study 3450 Clairemont Drive Project, prepared by: BlueScape Environmental, December 18, 2020.

IV. Biology

- ☒ City of San Diego, Multiple Species Conservation Program (MSCP), Subarea Plan, 1997
- ☒ City of San Diego, MSCP, "Vegetation Communities with Sensitive Species and Vernal Pools" Maps, 1996
- ☒ City of San Diego, MSCP, "Multiple Habitat Planning Area" maps, 1997
- ☐ Community Plan - Resource Element
- ☐ California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered, Threatened, and Rare Plants of California," January 2001
- ☐ California Department of Fish & Game, California Natural Diversity Database, "State and Federally-listed Endangered and Threatened Animals of California," January 2001
- ☐ City of San Diego Land Development Code Biology Guidelines
- ☒ Site Specific Report: Biological Letter Report Clairemont Drive Project, prepared by: Alden Environmental, Inc., April 19, 2021.

V. Cultural Resources (includes Historical Resources)

- ☒ City of San Diego Historical Resources Guidelines
- ☐ City of San Diego Archaeology Library
- ☐ Historical Resources Board List
- ☐ Community Historical Survey:
- ☒ Site Specific Report: Archaeological Resources Report Form for the Clairemont Drive Project, prepared by: Red Tail Environmental, February 23, 2021.

VI. Energy

- ☒ City of San Diego Climate Action Plan (CAP), (City of San Diego 2020)
- ☒ City of San Diego Climate Action Plan Consistency Checklist, March 2021.

VI. Geology/Soils

- ☒ City of San Diego Seismic Safety Study
- ☒ U.S. Department of Agriculture Soil Survey - San Diego Area, California, Part I and II, December 1973 and Part III, 1975
- ☒ Geology of the San Diego 30 X 60 minute Quadrangle, San Diego, California., California Geologic Survey Regional Geologic Map Series, 1:100,000 Scale; Map, No. 3, Sheet 1. Kennedy, M. P., and Tan, S.S., 2008
- ☒ Site Specific Report: Preliminary Geotechnical Investigation, Clairemont Townhomes, 3450 Clairemont Drive, prepared by: Advanced Geotechnical Solutions, Inc., May 15, 2020.
- ☒ Site Specific Report: Addendum to Geotechnical Report Addressing Cycle 1 Review Comments, Proposed Clairemont Townhome Project, 3450 Clairemont Drive, City of San Diego, prepared by: Leighton and Associates, Inc., January 5, 2021.

VII. Greenhouse Gas Emissions

- ☒ Site Specific Report: Climate Action Plan Consistency Checklist, March 2021

VIII. Hazards and Hazardous Materials

- ☒ San Diego County Hazardous Materials Environmental Assessment Listing, Geotracker
- ☒ Airport Land Use Compatibility Plan
- ☒ Site Specific Report: Phase I Environmental Assessment Report Holy Cross Lutheran Church, prepared by: Partner Engineering and Science, Inc., January 31, 2020.

IX. Hydrology/Water Quality

- ☐ Flood Insurance Rate Map (FIRM)
- ☒ Federal Emergency Management Agency (FEMA), National Flood Insurance Program-Flood Boundary and Floodway Map
- ☐ Clean Water Act Section 303(b) list, http://www.swrcb.ca.gov/tmdl/303d_lists.html
- ☒ Site Specific Report: Drainage Study for Clairemont Drive, prepared by: Rick Engineering Company, January 22, 2021.
- ☐ Site Specific Report: Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) Clairemont Drive, prepared by: Rick Engineering Company, January 22, 2021.

X. Land Use and Planning

- ☒ City of San Diego General Plan
- ☒ Community Plan
- ☒ Gillespie Field Airport Land Use Compatibility Plan
- ☒ Montgomery Field Airport Land Use Compatibility Plan
- ☒ City of San Diego Zoning Maps
- ☐ Other Plans:

XI. Mineral Resources

- ☒ California Department of Conservation - Division of Mines and Geology, Mineral Land Classification
- ☒ Division of Mines and Geology, Special Report 153 - Significant Resources Maps
- ☐ Site Specific Report:

XII. Noise

- ☒ City of San Diego General Plan
- ☐ Community Plan
- ☐ San Diego International Airport - Lindbergh Field CNEL Maps
- ☐ Brown Field Airport Master Plan CNEL Maps
- ☒ Montgomery Field CNEL Maps
- ☐ San Diego Association of Governments - San Diego Regional Average Weekday Traffic Volumes
- ☐ San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
- ☒ Site Specific Report: Noise Analysis Report 3450 Clairemont Drive, prepared by: dBF Associates, Inc., November 30, 2020.

XIII. Paleontological Resources

- ☒ City of San Diego Paleontological Guidelines
- ☐ Deméré, Thomas A., and Stephen L. Walsh, "Paleontological Resources City of San Diego," Department of Paleontology San Diego Natural History Museum, 1996
- ☐ Kennedy, Michael P., and Gary L. Peterson, "Geology of the San Diego Metropolitan Area, California. Del Mar, La Jolla, Point Loma, La Mesa, Poway, and SW 1/4 Escondido 7 1/2 Minute Quadrangles," California Division of Mines and Geology Bulletin 200, Sacramento, 1975
- ☐ Kennedy, Michael P., and Siang S. Tan, "Geology of National City, Imperial Beach and Otay Mesa Quadrangles, Southern San Diego Metropolitan Area, California," Map Sheet 29, 1977
- ☐ Site Specific Report:

XIV. Population / Housing

- ☒ City of San Diego General Plan
- ☒ Community Plan
- ☐ Series 11/Series 12 Population Forecasts, SANDAG
- ☐ Other:

XV. Public Services

- ☒ City of San Diego General Plan
- ☒ Community Plan

XVI. Recreational Resources

- ☒ City of San Diego General Plan
- ☒ Community Plan, 1988
- ☐ Department of Park and Recreation
- ☐ City of San Diego - San Diego Regional Bicycling Map
- ☐ Additional Resources:

XVII. Transportation / Circulation

- ☒ City of San Diego General Plan
- ☒ City of San Diego Transportation Study Manual, September 29, 2020.
- ☐ San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
- ☐ San Diego Region Weekday Traffic Volumes, SANDAG

XVIII. Utilities

X Site Specific Report: Waste Management Plan for Clairemont Drive Project, prepared by: KLR Planning, May 2021.

XIX. Water Conservation

____ Sunset Magazine, New Western Garden Book, Rev. ed. Menlo Park, CA: Sunset Magazine

XXII. Wildfire

X City of San Diego General Plan

X Community Plan: College Area

X Very High Fire Severity Zone Map, City of San Diego

X City of San Diego Brush Management Regulations, Landscape Regulations (SDMC 142.0412)



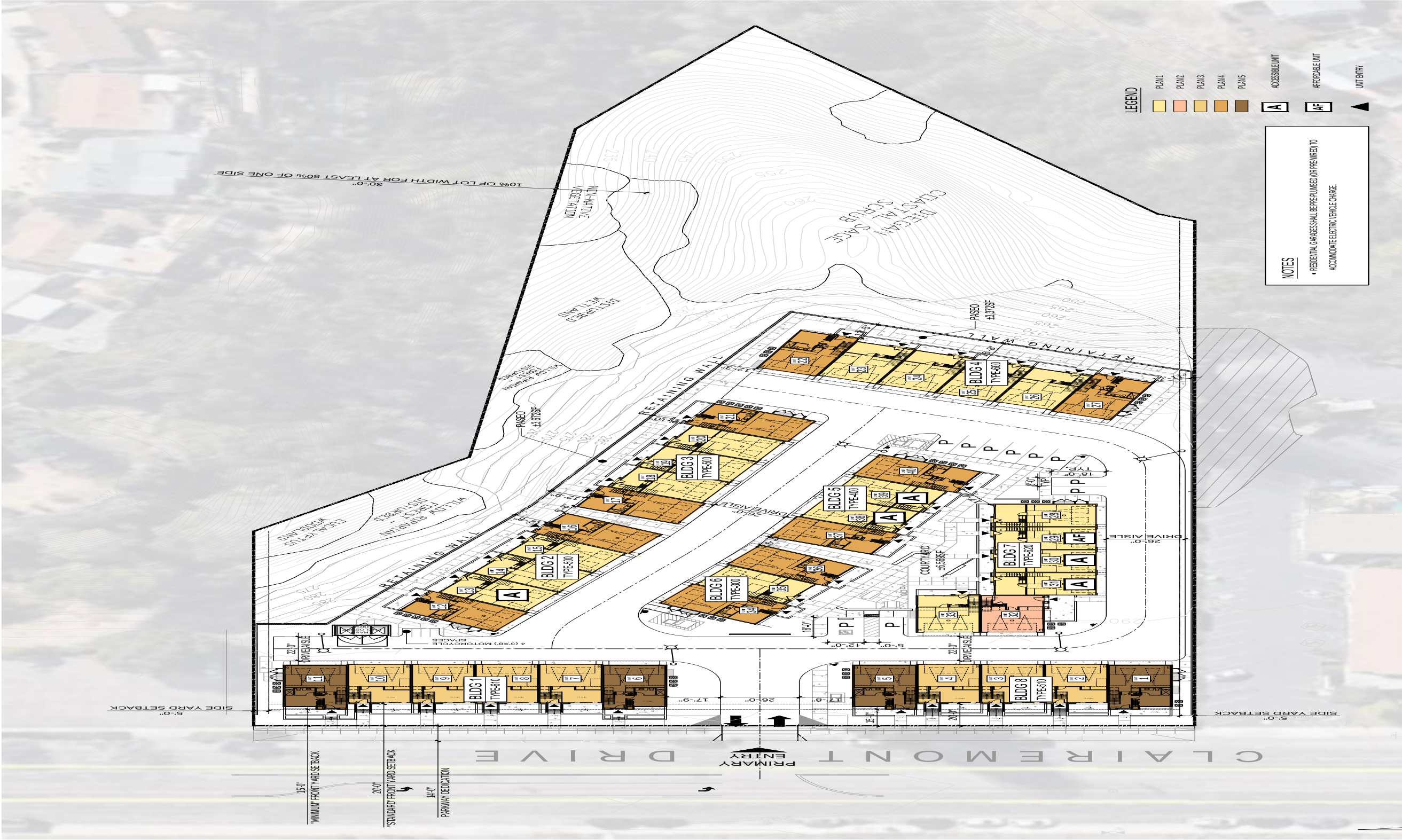
Vicinity Map
Clairmont Drive / Project No. 677814
City of San Diego - Development Services
Department

FIGURE
No. 1



Project Location Map
 Clairmont Drive / Project No. 677814
 City of San Diego – Development Services Department

FIGURE
 No. 2



Site Plan
Clairmont Drive / Project No. 677814
City of San Diego - Development Services Department

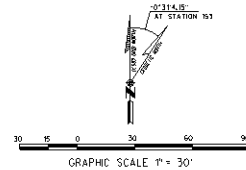
FIGURE
No. 3



- CONSTRUCTION NOTES**
- 1 PROPOSED 6" CURB AND GUTTER PER SD STD. DWG. SDG-151
 - 2 PROPOSED CURB RAMP PER SD STD. DWG. SDG-155
 - 3 PROPOSED 5' SIDEWALK PER SD STD. DWG. SDG-155
 - 4 PROPOSED 25' CONCRETE DRIVEWAY PER SD STD. DWG. SDG-160
 - 5 PROPOSED 6" CURB PER SD STD. DWG. SDG-150
 - 6 PROPOSED RETAINING WALL PER STRUCTURAL PLANS
 - 7 PROPOSED SITE WALL, SEE LANDSCAPE PLANS
 - 8 PROPOSED LANDSCAPING, SEE LANDSCAPE PLANS
 - 9 PROPOSED BIODEGRADABLE BIODEGRADATION MODULAR WETLAND
 - 10 PROPOSED SEWER MANHOLE PER SD STD. DWG. SDG-106
 - 11 PROPOSED UNDERGROUND STORM TRAP DETENTION VAULT
 - 12 PROPOSED PUMP STATION
 - 13 PROPOSED RETAINING WALL PER SD STD. DWG. C-03
 - 14 PROPOSED FIRE HYDRANT PER SD STD. DWG. SDW-104
 - 15 PROPOSED TYPE B INLET PER SD STD. DWG. SDG-116
 - 16 PROPOSED RIP RAP PAD
 - 17 PROPOSED A-4 CLEANOUT PER SD STD. DWG. D-09
 - 18 PROPOSED CLEANOUT FOR SEWER FORCE MAIN PER SD STD. DWG. SDG-109
 - 19 PROPOSED SIGNAGE PER LANDSCAPE
 - 20 SIGHT VISIBILITY TRIANGLE (10'x10')
 - 21 EXISTING TRANSIT STOP (212' FT NORTHWEST)
 - 22 PROPOSED 192 SF TRASH ENCLOSURE
 - 23 PROPOSED 4" BERM PER DETAIL ON SHEET 2
 - 24 PROPOSED 0" CURB
 - 25 PROPOSED CROSS GUTTER DETAIL ON SHEET 2
 - 26 PROPOSED 2" BLOW-OFF PER STD. DWG. SDW-143
 - 27 PROPOSED 2" AIR VAC PER STD. DWG. SDW-159
 - 28 PROPOSED STRUCTURAL HEADWALL
 - 29 PROPOSED 10' X 10' CATCH BASIN
 - 30 PROPOSED A-6 CLEANOUT PER STD. DWG. D-09
 - 31 PROPOSED IRRIGATION METER
 - 32 PROPOSED IRRIGATION BACKFLOW
 - 33 PROPOSED CUT-OFF WALL PER STD. DWG. SDG-115
 - 34 EXISTING STREET LIGHT
 - 35 PROPOSED 2-2" WATER BACKFLOW PER WILKINS MODEL 375 DA OR APPROVED EQUAL
 - 36 FIRE LANE PARKING SIGN PLACED EVERY 100'
 - 37 PROPOSED LEFT TURN LANE
 - 38 PROPOSED 2-2" WATER METER PER SD STD. DWG. SDW-114(R)
 - 39 PROPOSED TRAFFIC STRIPING
 - 40 PROPOSED 8" FIRE SERVICE BACKFLOW PER WILKINS MODEL 475 DA OR APPROVED EQUAL
 - 41 LIMITS OF REMEDIAL GRADING
 - 42 PROPOSED SEWER CLEANOUT PER STD. DWG. SDG-121
 - 43 FOUND LEAD & DISK STAMPED "S-2954"
 - 44 FOUND LEAD & DISK STAMPED "S-1534"

LEGEND

ITEM	SYMBOL
SIDEWALK	---
ADA UNIT	---
DAYLIGHT LINE	---
LOT NUMBER	①
FIRE LANE PARKING SIGN	---
EXIST. MONUMENTS	---



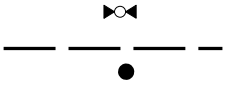
Vesting Tentative Map
Clairmont Drive / Project No. 677814
City of San Diego - Development Services Department

FIGURE
No. 4

FIRE HYDRANT

HOSE PULL (200' MAX.)

APPROX. LOCATION OF FIRE TRUCK



Clairmont Drive / Project No. 677814

**FIGURE
No. 5**