

MITIGATED NEGATIVE DECLARATION

THE CITY OF SAN DIEGO

Project No. 614178 SCH No. N/A

SUBJECT: VETERANS AFFAIRS HOSPITAL ANNEX: CONDITIONAL USE PERMIT (CUP) and LOT LINE ADJUSTMENT to allow for the renovation of an existing approximately 114,000 square-foot, twostory office building and the construction of two additions for a total of approximately 139,000 square feet. The building would house outpatient services, such as audiology, pathology, eye clinic, radiology, mental health, and general wellness clinics to be operated by the United States Department of Veterans Affairs. The project would also construct a new four-story parking garage along with associated site improvements (i.e., hardscape, site utilities, drainage improvements, landscaping, site parking, and walls). The 7.71-acre site is located at 8825-8875 Aero Drive between Interstate 805 and Interstate 15 within the Kearny Mesa Community. Project activities would only occur on 5.70 acres of the site. The site is designated for Industrial Employment by the City's General Plan, Industrial and Business Parks land uses by the Kearny Mesa Community Plan, and is zoned Industrial (IP-2-1). Additionally, the project is within the Airport Influence Area (AIA) for Montgomery Field, and the Federal Aviation Administration (FAA) Part 77 Noticing Area and FAA Height Notification Boundary Area for Montgomery Field. (LEGAL DESCRIPTION: Lots 7 and 8 of Research Park Subdivision Addition Map No. 6386; Assessor's Parcel Number 421-300-03-00.) Applicant: Protea Properties.

Revisions to this document have been made when compared to the Draft Mitigated Negative Declaration (DMND) dated December 14, 2018. Information related to the number of parking spaces were corrected in the Initial Study. The modification to the Final MND is denoted by strikeout and <u>underline</u> format. In accordance with the California Environmental Quality Act, Section 15073.5 (c)(4), the addition of new information that clarifies, amplifies, or makes insignificant modification does not require recirculation as there are no new impacts and no new mitigation identified. An environmental document need only be recirculated when there is identification of new significant environmental impact or the addition of a new mitigation measure required to avoid a significant environmental impact. The information that was added to the environmental document does not affect the environmental analysis or conclusions of the MND.

I. PROJECT DESCRIPTION:

See attached Initial Study.

II. ENVIRONMENTAL SETTING:

See attached Initial Study.

III. DETERMINATION:

The City of San Diego conducted an Initial Study which determined that the proposed project could have a significant environmental effect in the following area(s): **Transportation/Traffic**. Subsequent revisions in the project proposal create the specific mitigation identified in Section V of this Mitigated Negative Declaration. The project as revised now avoids or mitigates the potentially significant environmental effects previously identified, 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:

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

- Prior to the issuance of a Notice To Proceed (NTP) for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction-related activity on site, the Development Services Department (DSD) Director's Environmental Designee (ED) and Local Enforcement Agency (LEA) shall review and approve all Construction Documents (CDs), (plans, specification, details, etc.) to ensure the MMRP requirements are incorporated into the design.
- 2. In addition, the ED shall verify that <u>the MMRP Conditions/Notes that apply ONLY to</u> <u>the construction phases of this project are included VERBATIM</u>, under the heading, **"ENVIRONMENTAL/MITIGATION REQUIREMENTS."**
- 3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website: http://www.sandiego.gov/development-services/industry/standtemp.shtml
- 4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/ Mitigation Requirements" notes are provided.
- 5. SURETY AND COST RECOVERY: The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.
- B. GENERAL REQUIREMENTS PART II Post Plan Check (After permit issuance/Prior to start of construction)
 - 1. **PRECONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT**. The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division, City staff from MITIGATION

MONITORING COORDINATION (MMC), and LEA. Attendees must also include the Permit holder's Representative(s), Job Site Superintendent and the following consultants: Paleontological Monitor.

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

CONTACT INFORMATION:

- a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division 858-627-3200**.
- b) For Clarification of ENVIRONMENTAL REQUIREMENTS, it is also required to call **RE and MMC at 858-627-3360.**
- 2. MMRP COMPLIANCE: This Project, Project Tracking System (PTS) Number 614178 and/or Environmental Document Number 614178, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC), the City Engineer (RE), and LEA. The requirements may not be reduced or changed but may be annotated (i.e., to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.

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

- 3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE, MMC, and LEA for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution or other documentation issued by the responsible agency:
- 4. **MONITORING EXHIBITS:** All consultants are required to submit to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of that discipline's work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.

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

5. **OTHER SUBMITTALS AND INSPECTIONS:** The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all

associated inspections to the RE, MMC, and LEA for approval per the following schedule:

Document Submittal/Inspection Checklist				
Issue Area	Document Submittal	Associated Inspection/Approvals/Notes		
General	Consultant Qualification Letters	Prior to Preconstruction Meeting		
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting		
General	No Document Submittal Required	Monthly facility inspections per California Code of Regulations Title 14 requirements		
Waste Management	Waste Management Reports	Waste Management Inspections		
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter		

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

Transportation/Traffic

TRA-1: Aero Drive/Sandrock Road Intersection

The project applicant shall provide the following improvements to the Aero Drive/Sandrock Road intersection: reconfigure the northbound and southbound approaches, currently controlled with split signal phasing, to provide protected signal phasing. The northbound approach shall be restriped to provide two dedicated left-turn lanes and a shared thru/rightturn lane. Modifications to the southbound approach include replacing the existing 9-foot raised median with a 4-foot raised median and restriping to provide a shared thru/right-turn lane, a 10-foot painted median with chevron markings, and a dedicated left-turn lane.

VI. PUBLIC REVIEW DISTRIBUTION:

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

CITY OF SAN DIEGO Development Project Manager: Morris Dye Councilmember Scott Sherman, Councilmember District 7 EAS – Jeff Szymanski LDR Planning - Sarah Hatinen LDR Engineering - Karen Vera Water and Sewer – Jay Purdy MMC - Sam Johnson LDR-Landscaping - Frank Hunt LDR Geology – Patrick Thomas LDR-Transportation – Ismail Elhamad Environmental Services Department - Lisa Wood Facilities Financing (93B) Water Review (86A) Central Library MS 17 (81a) Serra Mesa/Kearny Mesa Branch Library (81GG) Planning Department - Sara Toma

OTHER ORGANIZATIONS AND INTERESTED PARTIES Clint Linton (215B) – lipay Nation of Santa Ysabel Lisa Cumper, Tribal Historic Preservation Officer – Cultural Resources Manager Kearny Mesa Community Planning Group (265) Mary Johnson (263b) San Diego Gas and Electric (114) Metropolitan Transit System (115)

VII. RESULTS OF PUBLIC REVIEW:

- (X) No comments were received during the public input period.
- () Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.
- () Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.

Copies of the draft Mitigated Negative Declaration, the Mitigation, Monitoring and Reporting Program and any Initial Study material are available in the office of the Entitlements Division for review, or for purchase at the cost of reproduction.

Jeffrey/Szymanski Senior Planner Development Services Department

December 14, 2018 Date of Draft Report

January 11, 2019 Date of Final Report

Analyst: Jeffrey Szymanski

Attachments: Initial Study Checklist Figure 1: Site Vicinity Map Figure 2: Aerial Photograph Figure 3: Site Plan

INITIAL STUDY CHECKLIST

- 1. Project title/Project number: Veterans Affairs (VA) Hospital Annex / 614178
- 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: Jeffrey Szymanski / (619) 446-5324
- 4. Project location: 8875 Aero Drive, San Diego, CA 92123
- 5. Project Applicant/Sponsor's name and address: Clint Fowler, Protea Properties, 3262 Holiday Court, Suite 100, La Jolla, CA 92037
- 6. General/Community Plan designation: Industrial Employment/Industrial and Business Parks
- 7. Zoning: IP-2-1
- 8. Description of project:

Project Features

A request for a CONDITIONAL USE PERMIT and LOT LINE ADJUSTMENT to allow for renovation and repurposing of an existing approximately 114,000 square-foot office building, associated facilities, and surface parking lot. The building renovation would include an approximately 25,000 square-foot building addition, resulting in a two-story, 40-foot tall, 139,000 square-foot building and the construction of a four-story, approximately 50-foot tall, approximately 136,000 square-foot parking garage at the site (Figure 3). The repurposing of the building would house VA outpatient services such as audiology, pathology, eye clinic, radiology, mental health, and general wellness clinics. The existing surface parking would be restriped and the four-story, 394385-stall parking garage to comply with current water quality regulations and landscaping would also occur as part of the project. The lot line adjustment would add land containing a surface parking lot for the adjacent commercial office building to the project parcel from the parcel to the west.

The project's demolition phase would include wall sawing for new windows/openings, and demolition of portions of the asphalt parking areas, walkway areas, and the portions of the landscaping proposed for removal. Two building additions would be added to the existing structure, resulting in an increase in building size of approximately 25,000 square feet. One addition would be located on the northern edge of the building and the second addition would be located along the western edge of the building. New sewer and water utilities would be constructed to serve the parking garage. The portion of the project site that would serve the VA Hospital Annex, including the parking garage, would provide a total of 637 parking stalls, including 525-535 standard stalls, 25 accessible stalls, 44 clean air/vanpool stalls, and 33 electric vehicle stalls, and . In addition, there would be 10 motorcycle stalls

provided on site. The proposed hospital annex facility would require a minimum of 486 parking spaces based on the City's Land Development Code (LDC) requirement of 3.5 parking spaces for each 1,000 feet of building area. The project provides 637 total parking spaces, an additional 151 stalls over the requirement contained in the LDC.

The project includes improvements to the configuration of the internal circulation and driveways. Currently, access to the site is provided via two driveways on Aero Drive. The two existing driveways are approximately 100 feet apart from each other, with the easternmost driveway located near the eastern property boundary. The existing westernmost driveway on the project site would be removed as part of the project and a sidewalk connection would be placed across the current driveway location to connect to the existing sidewalk along Aero Drive. The existing driveway on the adjacent lot to the west would become part of the parcel where project construction is occurring as part of the proposed lot line adjustment and would provide a second project access from Aero Drive. The two driveways would be located approximately 200 feet apart from each other. The driveways would provide access all the way around the building for deliveries and fire access. Access to the eastern side of the building and the rear of the building (to the south) would be gate-controlled. The project site also has a legal easement to access Sandrock Road thru the contiguous properties to the west of the site. The project would construct a raised median along its frontage with Aero Drive, connecting to the existing median to the west of the project site, in order to satisfy the City's Major Roadway requirements. Left turns out of the site would be prohibited.

The project would include selective removal and replacement of asphalt paving and curbs for reconfigured surface parking lot. An existing site wall along the northern property boundary (parallel to Aero Drive) would be demolished. There is an existing wooden fence and concrete masonry unit (CMU) wall along the southern project boundary. The wooden fence is present along the southern property boundary and runs from the existing lot line (just west of the existing building) to the western edge of the project site, once the lot line adjustment is made. It is approximately 370 feet in length. The existing CMU wall runs along the property boundary from the existing western lot line to the eastern property boundary, approximately 330 feet in length. The existing fencing and CMU block wall along the southern property boundary would remain in place and no changes to either are proposed as part of the project.

The project includes construction of three bio-retention planters for stormwater management. One bio-retention planter would be located along the northern property boundary adjacent to Aero Drive, one would be located within the surface parking area, and one would be located adjacent to the hospital annex building. An underground storage chamber would be constructed in the northern portion of the site for stormwater retention. Construction of a pump in a vault to discharge stormwater to an existing sidewalk culvert along Aero Drive would also occur as part of the project, as shown on the project grading and drainage plans and described below under *Proposed Drainage*.

The project would include short-term and long-term bicycle parking. Based on the City's LDC, 24 short-term and 24 long-term bicycle parking spaces (5% of the total 486 required parking stalls) are required for the site. Short-term bicycle parking would be placed near the

front entrance to the building and would include 25 stalls. Long-term bicycle parking would include 25 storage lockers and be located at the southwestern corner of the building. The project includes selective removal of existing landscaping, and the placement of new landscaping at the project site. Of the 136 existing trees at the project site, 45 would be protected in place. The remaining 91 existing trees would be removed for construction activities. As part of project construction, new landscaping would be installed at the site. In total, the completed project would include approximately 29,400 square feet of landscaping. The landscape design would incorporate the proposed hospital annex building into the existing community, to unify the proposed buildings with the adjacent properties to the east and west, and provide a buffer for the residential properties to the south. The intent of the landscape design is to create a strong sense of arrival, with a tree-lined entry drive which terminates in a large entry plaza. The plaza serves as a drop-off area and a gathering space, with enhanced paving, casual seating areas, and shade trees. Palm trees accentuate the entry drive and frame the building entry, while accent trees, along with raised planter boxes, reinforce the architecture along the building's front elevation. The proposed plant palette echoes the existing landscape to the west. Fencing, large canopy trees and an evergreen hedge would help screen the development from the residential properties to the south. Additional canopy trees surround the proposed parking garage, providing screening while further reinforcing the tie to the adjacent developments.

Project construction would occur over a 20- to 22-month period, with demolition activities (wall sawing for new windows/openings; removal of portions of existing asphalt parking, walkway areas, and landscaping) occurring over a two-month period during the 20- to 22-month construction period. Construction activities are expected to begin in the last quarter of 2019. Construction activities would require the export of approximately 6,000 cubic yards of material from the project site. All excavated material would be exported to a legal disposal site.

9. Surrounding land uses and setting:

The 7.71-acre project site is located at 8825-8875 Aero Drive, San Diego, California. Project activities would only occur on 5.70 acres of the project site (Figures 1 and 2). The project site is developed with an existing approximately 114,000 square-foot office building, an associated paved surface parking lot, landscaping, utilities, and other minor improvements. The building is a concrete tilt-up that was constructed in 1980 and tenant-occupied until 2016 but is currently vacant. Elevations on site range from approximately 420 feet above mean sea level (amsl) in the south portion of the site to approximately 413 feet amsl in the northern portion of the site. The site is bounded by Aero Drive to the north, commercial structures to the east and west, and residential development to the south. Beyond Aero Drive to the north is Montgomery Field. Primary access to the site is via two driveways from Aero Drive and the site has a legal easement to access Sandrock Road through the contiguous properties to the west.

The site is designated Industrial and Business Parks in the Kearny Mesa Community Plan and zoned IP-2-1. The site is also within Airport Influence Area (AIA) of Montgomery Field. The project site is located within a developed area currently served by existing public services and utilities. The site is bounded by Aero Drive to the north, commercial structures to the

east and west, and single-family residential development to the south. Beyond Aero Drive to the north is Montgomery Field. The Serra Mesa-Kearny Mesa Library is located approximately 700 feet east of the site, beyond an adjacent commercial building. The Serra Mesa Recreation Center is located approximately 1,300 feet southeast of the project site. Cabrillo Heights Park is located approximately 0.5 mile to the west of the site. The Interstate 805/State Route 163 interchange is located approximately 0.8 mile to the west of the project site.

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

Regional Water Quality Control Board (RWQCB)

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 Public Resources Code 21080.3.1, the City of San Diego provided formal notification to the lipay Nation of Santa Isabel and the Jamul Indian Village consultation was not requested by either tribe. Please see Section XVII of the Initial Study for more detail.

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	Greenhouse Gas Emissions		Population/Housing
Agriculture and Forestry Resources	Hazards & Hazardous Materials		Public Services
Air Quality	Hydrology/Water Quality		Recreation
Biological Resources	Land Use/Planning	\boxtimes	Transportation/Traffic
Cultural Resources	Mineral Resources		Tribal Cultural Resources
Geology/Soils	Noise		Utilities/Service System

Mandatory Findings Significance

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.
- 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.
- "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 crossreferenced).
- 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
i. Aesthetics – Would the project:				
 a) Have a substantial adverse effect on a scenic vista? 				\boxtimes

The project would include the renovation and repurposing of an existing commercial office building and the construction of a four-level parking garage. Although the building additions would increase the building size by approximately 25,000 square feet, the building's height would not change, nor would the building additions substantially alter the bulk and scale of the existing building. Construction of the four-level parking garage would increase the amount of building area on the project site where a surface parking lot exists today. The parking garage would be approximately 10 feet higher than the existing office structure; however, it would comply with the underlying development regulations in terms of bulk and scale. The site is surrounded by Aero Drive and Montgomery Field to the north, commercial uses to the east and west, and residential uses to the south. The Kearny Mesa Community Plan identifies Murphy Canyon and a tributary of the San Clemente Canyon as major scenic features in the community with high freeway visibility. The project site is not visible from these canyons, and implementation of the project would not alter views of the canyons for adjacent or neighboring properties. The project site is surrounded by development and not located within identified scenic corridors. As such, the renovation and expansion of the existing facility would not adversely affect scenic vistas. No impact would occur.

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



State scenic highways in San Diego County include small portions of State Routes 75, 78, 125, and 163. None of the designated state scenic highways are located within close proximity to the project site. The project site is not within a state scenic highway and would have no impact on a state scenic highway. The Kearny Mesa Community Plan identifies Murphy Canyon and a tributary of the San Clemente Canyon as major scenic features in the community. The project site is not visible from these canyons. The Kearny Mesa Community Plan does not identify scenic resources in close proximity to the project site. In addition, the project would not damage existing scenic rock outcroppings or historic buildings, as none of these features are located within the boundaries of the developed project site. No impact would occur.

C)	Substantially degrade the existing visual			
	character or quality of the site and its		\boxtimes	
	surroundings?			

The project involves the renovation and repurposing of an existing commercial office building for use as a hospital annex facility. The project site is fully developed and is surrounded by commercial and residential development on all sides, except to the north, where Montgomery Field is located and airport-related structures are situated. The project would result in the continued use of the site as zoned and would not substantially alter the types of activities occurring on the site. Although the project would result in an increase in building size (with the addition of approximately 25,000 square feet of building area on its north and west elevations), the building height would not change, nor

Potentially Significant Impact Significant Impact

Issue

h Less Than Significant Impact

Less Than

No Impact

would the building additions substantially alter the bulk and scale of the existing building given their location facing Aero Drive and Montgomery Field and the adjacent commercial property to the west. The addition on the north elevation would be one story and would not alter the bulk and scale of the building. The addition on the west elevation would be two stories and would be the same height as the existing building. The project would also include the construction of a four-story parking garage that would rise to approximately 50 feet above grade. With regard to existing bulk and scale in the project area, there are two commercial buildings to the west of the project, between the project site and Sandrock Road. Both nearby buildings are three stories in height. The commercial building to the east of the site is two stories in height. Directly across Aero Drive from the project site are airport buildings and hangars for Montgomery Field. The portions of these buildings fronting Aero Drive consist of long buildings with alternating single-story and two-story heights (airplane hangars). The proposed additions would not substantially alter the bulk and scale of the existing building and would be consistent with the bulk and scale of existing commercial development to the east and west and Montgomery Field to the north. The proposed parking garage would introduce a new structure where none currently exists that would exceed the height of the existing office building on site and general scale of other structures in the area; however, the proposed parking garage would not substantially exceed the existing structure and surrounding development (i.e., approximately 10 feet higher than the existing building).

To soften and screen the parking garage, Flexfacades screens are proposed on the southern elevation and trees would be planted along the southern wall of the parking garage, helping to shield some of the parking garage wall from adjacent development. Additionally, a number of trees and an evergreen hedge are proposed along the southern property line. The tree canopies and the hedge would ultimately serve to partially shield and soften views of the proposed parking garage and building. Thus, while the proposed project would result in the construction of a new structure (the parking garage) that would result in visual changes of the site, the project would incorporate design measures and landscaping to soften the visual character changes.

The architectural style of the office building would not change, although the project proposes cosmetic additions to the building façade. The new one-story building addition on the north elevation would include a new concrete wall panel with girded reveal pattern or fiber cement panels and a metal panel with a horizontal pattern to provide visual interest. The existing building entrance on the north elevation would be improved with a new concrete wall panel with vertical form liner pattern or accent paint, a sheet metal sculptural element integrated into a seating area, an accent wall with painted pattern, and a metal canopy wrapped with metal panel. These cosmetic improvements would serve to create a clear building entry with aesthetically-pleasing elements. The south and east elevations would remain similar to the existing condition, although the one-story building addition on the north elevation would be visible from the east elevation. The west building elevation would include improvements associated with the entry on the north elevation. Several new cosmetic components associated with the entry would also be visible from the west elevation, including the metal canopy wrapped with metal panel and a new concrete wall panel with vertical form liner pattern or accent paint. The west elevation would also include a curtain wall system with clear anodized aluminum mullions, dual pane spandrel glass with opacity coating, and a metal panel with pattern reveals. The surrounding development consists of typical commercial buildings to the east and west and residential development to the south and does not contain or follow a single or

Issue	Potentially Significant Impact	Less Inan Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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common architectural theme. The proposed improvements to the existing building would not change the architectural style of the building or provide a style inconsistent with surrounding development but would provide pleasing cosmetic changes for a more clearly, defined entryway. The project would not starkly contrast with adjacent development.

The project site is developed with an existing commercial building and the project would not result in the physical loss, isolation, or degradation of a community identification symbol or landmark. The project site is not located within a highly visible area. The project site is visible from Aero Drive, and from Haveteur Way, Ediwhar Avenue, and Unida Place in the residential neighborhoods to the south. While the project site is visible from surrounding roadways and adjacent properties, it is not located in a highly visible area such as a canyon edge or hilltop and is not visible from area freeways. The project area is urbanized, and the project would not result in a change in overall character of the area nor would it open a previously undeveloped area for development.

The project includes selective removal of existing landscaping, and the placement of new landscaping; approximately 45 trees would be protected in place. The completed project would feature approximately 29,400 square feet (or 0.67 ac) of landscaped area across the 5.70-acre area proposed for construction activities. The intent of the landscape design would be to create a strong sense of arrival, with a tree-lined entry drive which terminates in a large entry plaza. The plaza would serve as both a drop-off area and a gathering space, with enhanced paving, casual seating areas, and shade trees. Palm trees would accentuate the entry drive and frame the building entry, while accent trees, along with raised planter boxes, would reinforce the architecture along the building's north elevation. The proposed plant palette would echo the existing landscaping to the west. Fencing, large canopy trees and an evergreen hedge would help screen the development from the residential properties to the south. Additional canopy trees would surround the proposed parking garage, providing screening and further reinforcing the tie to the adjacent properties to the east and west, and would help to enhance the architecture of the building while providing a screen buffer for the residential properties to the south.

As discussed in the preceding paragraphs, the project would comply with the bulk and scale regulations of the underlying zoning; no deviations are proposed. The project would incorporate cosmetic improvements to the building, and the proposed building additions, but would not have an architectural style in stark contrast to surrounding development. Based on the incorporation of design measures and landscaping to reduce the scale of the parking garage, coupled with the project's consistency with the bulk and scale and architectural style of surrounding development, impacts associated with changes to the visual quality and character of the site would be less than significant.

d)	Create a new source of substantial light			
	or glare that would adversely affect day		\boxtimes	
	or nighttime views in the area?			

Chapter 14 of the San Diego Municipal Code (SDMC), referred to as the Outdoor Lighting Regulations (Ordinance Number 20186), is intended to minimize light pollution, promote lighting design that conserves electrical energy, and provide adequate lighting for public safety. In Section 142.0740 of

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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the SDMC, the ordinance defines requirements for outdoor lighting, such as shielding and flat lenses use. Shielding would also minimize nuisance light to neighboring land uses. The project would comply with this ordinance, and shield and direct light downward and away from the property line to prevent light spillage onto neighboring properties and the night sky. New lighting would be added at the proposed parking garage, but it would comply with the lighting requirements contained in the SDMC. The parking garage would also include Flexfacades screens and landscape screening along the southern elevation that would minimize overspill due to illumination of upper levels of parking structure. Based on the current developed nature of the site, proposed design elements, as well as compliance with SDMC lighting requirements, the overall change in lighting at the site would result in a less than significant impact associated with light and glare.

- 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) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?



The project site is developed as a commercial office building and does not include important farmlands. The site is not designated or zoned for agricultural use and is not adjacent to areas zoned for or in agricultural use. Therefore, the project would have no direct or indirect impact to important farmland resources. No impact would occur.

b)	Conflict with existing zoning for		
	agricultural use, or a Williamson Act		\boxtimes
	Contract?		

The project site and surrounding areas are fully developed. The project site is not designated or zoned for agricultural use and is not adjacent to areas zoned for or in agricultural use. There project site is not subject to a Williamson Act Contract or adjacent to such lands. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act Contract. No impact would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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))?				

The project is not within an area designated as forest land, and forest land is not present within the project site or within the vicinity of the project site. The project site is located within an urban environment surrounded by existing development. Therefore, the project would not conflict with land zoned as forest or timberland and no impact would occur.



Refer to II(c), above. The project site is completely developed and implementation of the project would not result in the loss of forest land or the conversion of forest land to non-forest use. No impact would occur.

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		\boxtimes
	land to non-forest use?		

Refer to II(c), above. The project site is completely developed and implementation of the project would not result in the indirect loss of agricultural or forest land. No impact would occur.

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		\boxtimes
	quality plan?		

The California Clean Air Act (CAA) requires areas that are designated as non-attainment areas for state ambient air quality standards for ozone, carbon monoxide (CO), sulfur dioxide (SO₂), and nitrogen dioxide (NO₂) to prepare and implement plans to attain the standards by the earliest practicable date. The San Diego Air Basin (SDAB) is designated as a non-attainment area for the state ozone standard. Accordingly, the Regional Air Quality Strategy (RAQS) was developed to identify feasible emission control measures and provide expeditious progress toward attaining the state standards for ozone. The two pollutants addressed in the RAQS are reactive organic gases (ROG) and oxides of nitrogen (NOx), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and growth create challenges in controlling emissions and, by extension, to maintaining and improving air quality. The RAQS, in conjunction with the Transportation Control Measures (TCM), were most recently adopted in 2016 as the air quality plan

Issue	Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

for the region and are based on emission information from the California Air Resources Board (CARB), population growth, and vehicle miles traveled (VMT) projections prepared by the San Diego Association of Governments (SANDAG).

SANDAG growth projections are based on land use plans developed by local jurisdictions. As such, projects that propose development that is consistent with the growth anticipated by the local land use plan would be consistent with the SANDAG's growth projections and the RAQS emissions estimates. In the event that a project would propose development that is less dense than anticipated by the growth projections, the project would likewise be consistent with the RAQS. In the event a project proposes development that is greater than anticipated in the growth projections, further analysis would be warranted to determine if the project would exceed the growth projections used in the RAQS for the specific subregional area.

The project site is designated for Industrial and Business Park land uses in the Kearny Mesa Community Plan. The project is consistent with the land use designation for the site. The project would increase the size of the building on site and would add a parking garage; however, the project is consistent with land use designation for the site and as such, would be consistent with the growth projections anticipated by the City's General Plan and thus SANDAG's population growth and VMT projections. As RAQS emissions forecasts are based on land use assumptions from the City General Plan and SANDAG growth projections, the project is also accounted for in the RAQS emissions estimates. Therefore, the project would not obstruct or conflict with implementation of the RAQS. No impacts related to consistency with the RAQS would occur.

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b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Emissions

The project would result in the short-term, temporary generation of construction emissions. Construction emissions would be generated from the use of construction equipment at the site; construction-related traffic trips from workers and delivery trucks; and grading activities. Construction emissions would be temporary and short-term in nature and the project would not have the potential to violate an air quality standard or contribute to an existing or projected air quality violation.

The City's CEQA Significance Determination Thresholds identify 100 pounds per day of PM₁₀ (particulate matter 10 microns in diameter or less) as a screening threshold for fugitive dust impacts. The South Coast Air Quality Management District's *CEQA Air Quality Handbook* (1993) estimates that site grading generates 26.4 pounds PM₁₀ per graded acre. The project area to be graded is approximately 4.8 acres. Roughly 126 pounds of PM₁₀ would be generated by grading 4.8 acres per day. If the entire project site was graded in one day, it would result in an exceedance of the 100 pounds PM₁₀ screening threshold; however, as discussed in the project description, construction activities would occur over a 20- to 22-month period, with demolition activities (wall sawing for new windows/openings and removal of portions of existing asphalt parking, walkway areas, and landscaping) occurring over a two-month period during the overall construction period. Based on

Less Than Potentially Significant with Less Than Significant Mitigation Significant No Impact Impact Incorporated

the length of the demolition and construction period, it is not reasonable to assume that the entire project site would be graded in a single day. Additionally, as discussed in the City's CEQA Significance Determination Thresholds, daily watering at the site prior to/during grading activities as required by the City's Grading Ordinance would reduce dust emissions by 50 percent. A second daily watering would reduce dust emissions by 75 percent. Assuming a worst-case scenario where the entire site is graded in one day (which is not anticipated to occur), resulting in roughly 126 pounds of PM₁₀ being generated, daily watering at the project site would reduce dust emissions by 50 percent, to 63 pounds of PM₁₀, which is well below the threshold of 100 pounds per day. A second watering would reduce dust emissions by 75 percent, to approximately 32 pounds of PM₁₀ per day. The project would implement Best Management Practices (BMPs) for construction activities, including daily watering at the site prior to/during construction activities, in accordance with the City's Grading Ordinance. Additionally, construction activities would be required to comply with the City's BMPs which are enforceable under SDMC Section 142.0710. With the required implementation of daily watering and City BMPs, the fugitive dust emissions would be well below the 100 pounds per day threshold.

Based on the proposed construction activities associated with the project, discussed in the preceding paragraphs, the project would not violate an air quality standard or contribute to an existing or projected air quality violation as a result of construction emissions. Construction emissions would be less than significant.

Operational Emissions

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Operational emissions are long-term emissions generated at the site and would include mobile and area sources, such as traffic emissions generated by the workers and visitors to the hospital annex, delivery trucks, natural gas emissions used for heating, consumer products, architectural coatings, and landscaping equipment. As discussed in response III(a) above, the project is consistent with the land use designation for the site and therefore, consistent with the RAQS emissions forecasts and SANDAG growth projections related to regional emissions. As identified in the City's CEQA Significance Determination Thresholds, projects that would typically result in significant air quality impacts would include development that would produce 9,500 ADT. The project is expected to generate 5,082 net new ADT, based on the TIA prepared for the project (LLG 2018). The trips generated by the project represent approximately 55 percent of the ADT that would typically result in a significant impact. As such, the project would not result in a significant impact associated with air quality standards or contribute to an existing or projected air quality violation. Operational emissions would be less than significant.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The region is classified as attainment for all criteria pollutants except ozone, PM₁₀, and PM_{2.5}. Ozone is not emitted directly but is a result of atmospheric activity on precursors, NO_X and ROG. These compounds react in the presence of sunlight to produce ozone. As discussed above in Section III(b), emissions associated with the construction and operation of the project are expected to be well below the City's CEQA Significance Determination Thresholds. Therefore, the project would not result in a cumulatively considerable net increase in emissions of criteria pollutants. Impacts would be less than significant.

d)	Expose sensitive receptors to		
	substantial pollutant concentrations?		

Sensitive receptors include schools, hospitals, resident care facilities, day care centers, or other facilities that may house individuals with serious health conditions that would be adversely impacted by changes in air quality. The project site is surrounded by development, including commercial uses to the east and west, residential development to the south, and Montgomery Field to the north. The project site is not adjacent to or in close proximity to identified sensitive receptors. Additionally, as discussed in response III(b), the project would not result in the emission of pollutants in excess of established thresholds, and as such, would not result in the exposure of sensitive receptors the substantial pollutant concentrations. Impacts would be less than significant.

e) Create objectionable odors affecting a substantial number of people?

The proposed hospital annex is not a land use typically associated with emitting objectionable odors. The project has the potential to temporarily generate odors during the application of architectural coatings (painting), during asphalt application, and from diesel exhaust during construction activities; however, these activities would be short-term in nature and would be limited to the immediate area of usage. The long-term operation of the project would not create objectionable odors affecting a substantial number of people. Impacts associated with odors would be less than significant.

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?

The project site is fully developed and does not contain any sensitive riparian habitat or other identified habitat communities. The site is within an urban area and contains and is surrounded by existing development. The project would be required to comply with the requirements of the Migratory Bird Treaty Act (MBTA), in accordance with the City's Multiple Species Conservation Program (MSCP). Based on the developed nature of the project site and compliance with the MBTA, impacts to candidate, sensitive, or special status species would be less than significant.

ls	sue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				

The site is currently developed and includes a building, hardscape, and landscaping. No riparian habitat or other natural community that is regulated by the CDFW or USFWS exists on site. No impact would occur.

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?		

The site is currently developed and includes an office building, hardscape, and ornamental landscaping. No federally protected waters as defined by the Clean Water Act exist on site. No impact would occur.

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?		

The project site is currently developed and includes an office building, hardscape, and ornamental landscaping. There are no areas within the project site that may be used as a wildlife corridor for any native resident wildlife species and since the site is already built out, construction and operation of the project would not interfere with the movement of any native resident or migratory fish. The site is not used as a native wildlife nursery and is not located adjacent to or near any native wildlife nursery. No impact would occur.

e)	Conflict with any local policies or		
	ordinances protecting biological		\bowtie
	resources, such as a tree preservation		<u> </u>
	policy or ordinance?		

The project site does not contain biological resources and is not within a Multi-Habitat Planning Area (MHPA) as designated under the City of San Diego MSCP Subarea Plan (City of San Diego 1997). The project would not conflict with local policies addressing biological resources. No impact would occur.

Is	sue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				

The project site is not within a MHPA as designated under the City of San Diego MSCP Subarea Plan (City of San Diego 1997) and would not conflict with the City's MSCP. No impact would occur.

V. CULTURAL RESOURCES – Would the project:



The purpose and intent of the Historical Resources Regulations of the Land Development Code (Chapter 14, Division 3, and Article 2) is to protect, preserve and, where damaged, restore the historical resources of San Diego. The regulations apply to all proposed development within the City when historical resources are present. Before approving discretionary projects, CEQA requires the lead agency to identify and examine the significant adverse environmental effects that may result from that project. A project that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (Sections 15064.5(b) and 21084.1). A substantial adverse change is defined as demolition, destruction, relocation, or alteration activities, which would impair historical significance (Sections 15064.5(b)(1)). Any historical resource listed, or eligible to be listed, in the California Register of Historical Resources is considered to be historically or culturally significant.

The project site is currently developed with a commercial office building. This building is less than 45 years old as it was constructed in 1980 and is not of an age to be considered a potentially historic resource. Thus, no impact to historic resources would occur.



A record search of the California Historic Resources Information System (CHRIS) digital database was reviewed by qualified City Staff to determine presence or absence of potential resources within the project site and one-mile radius. The record search did not identify any archaeological sites within or adjacent to the project area. Furthermore, the project site is already fully developed with an existing commercial office building and an associated parking lot and landscaping. The project site was previously graded to allow for the existing development and is underlain by a layer of placed fill. Archaeological resources occurring at the site would have been discovered or displaced during the initial development of the site. Based on the fully developed condition of the site and the negative CHRIS search, staff determined that the implementation of the project would not result in significant impacts to archaeological resources. No impact would occur.

Is	sue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			\boxtimes	

Based on a geotechnical investigation prepared by Construction Testing & Engineering, Inc. (CTE, Inc.) dated April 30, 2018, the project site is underlain by Quaternary Previously Placed Fill overlying Very Old Paralic Deposits. The Quaternary Previously Placed Fill has an observed maximum depth of 7 feet below ground surface (bgs). Surrounding the existing commercial office building, the observed depth of Quaternary Previously Placed Fill ranged from approximately 5 to 7 feet bgs. In the area proposed for the parking garage, Quaternary Previously Placed Fill was at a thickness ranging from 1 to 4 feet bgs. The geotechnical investigation anticipates the Very Old Paralic Deposits at depth throughout the project site. Very Old Paralic Deposits are identified by the City's CEQA Significance Determination Thresholds as broadly correlative with the Lindavista Formation. The Lindavista Formation is identified as a geological deposit that has a moderate paleontological sensitivity rating for all areas where it occurs outside of Mira Mesa/Tierrasanta; thus, the Very Old Paralic Deposits at the site would have a paleontological sensitivity rating of moderate. Grading thresholds for required paleontological monitoring are identified in the City's CEQA Significance Determination Thresholds. For areas with a moderate sensitivity rating, grading thresholds for required monitoring are for excavation of 2,000 cubic yards or greater and in excess of 10 feet deep. The project proposes excavation of approximately 6,000 cubic yards and a maximum excavation depth of 8 feet, and thus, would not exceed the 10-foot depth requirement for paleontological monitoring. As such, the project's impact to paleontological resources would be less than significant.

d) Disturb and human remains, including those interred outside of dedicated

No cemeteries, formal or informal, have been identified on or adjacent to the project site. The project site has been previously graded and is fully developed with no potential for human remains given the presence of placed fill across the site. Given that the project site is already developed, no impacts associated with human remains are identified.

VI. 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:
 - 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.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Based upon the project geotechnical investigation prepared by CTE, Inc. (April 30, 2018), the project site is not located within a local fault hazard zone or State of California-designated Alquist-Priolo Earthquake Fault Studies Zone. No know active fault traces underlie or project toward the site. The nearest known Class A fault (a fault identified based upon relatively well-defined paleoseismic activity and a fault-slip rate of more than 5 millimeters per year) is the Julian segment of the Elsinore Fault, which is located approximately 36 miles northeast of the project site. The nearest known Class B fault (a fault having comparatively less defined paleoseismic activity and considered to have a fault-slip rate of less than 5 millimeters per year) is the Rose Canyon Fault, located approximately 4 miles southwest of the project site. While the project site, like most of Southern California, would be subject to seismic ground shaking from the active faults within the region, the project would not be located in a fault hazard zone. Therefore, no impact would occur.

ii) Strong seismic ground shaking?

Major seismic events on local and regional active faults described above under VI.a.i could subject the site to moderate to severe ground shaking. The project site could be subject to significant shaking in the event of a major earthquake on the Elsinore Fault, the Rose Canyon Fault, or other faults in southern California or the northern Baja California area. While the project site, as well as most of Southern California, would be subject to seismic ground shaking from the active faults within the region, the project would utilize proper engineering design and standard construction practices in accordance with the California Building Code which would reduce impacts to people or structures due to local seismic events to an acceptable level of risk. Therefore, impacts would remain less than significant.

iii)	Seismic-related ground failure,		
	including liquefaction?		

Liquefaction typically occurs when saturated fine-grained sands or silts lose their physical strengths during earthquake-induced shaking and behave like a liquid. Liquefaction potential varies with water level, soil type, material gradation, relative density, and probable intensity and duration of ground shaking. Seismically induced settlement is settlement that may occur whether the potential for liquefaction exists or not. Seismic settlement results from densification of loose soils.

The potential for liquefaction and seismically induced settlement occurring within the site soils is considered to be "low" due to the geologic conditions encountered during the geotechnical investigation. Specifically, the site is underlain at shallow depths by medium dense to very dense formational materials (Very Old Paralic Deposits). Additionally, the project would utilize proper engineering design and standard construction practices in accordance with the California Building Code guidelines. Based on the low potential for liquefaction and seismically induced settlement identified by the project's geotechnical investigation (CTE, Inc. 2018), and the project's adherence to proper engineering design and standard construction practices consistent with the California Building Building Code, no impact associated with liquefaction and seismically induced settlement would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iv) Landslides?				\boxtimes

The site is considered to be only "Marginally Susceptible" to landsliding (CTE, Inc. 2018). No landslides have been mapped in the project vicinity. No evidence of landslides or landslide potential was observed during the geotechnical field exploration of the project site. Additionally, the project site is already developed, is relatively flat, and is not adjacent to slopes. As such, the probability of the project site being subject to landslides is minimal and no impact would occur.

b)	Result in substantial soil erosion or the		
	loss of topsoil?		

The project demolition and construction activities would have the potential to cause erosion and the downstream transport of sediment. However, these potential impacts would be addressed through conformance with applicable requirements under the California General National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges. This requirement typically involves the preparation and implementation of an approved Storm Water Pollution Prevention Plan (SWPPP), which includes erosion and sediment control BMPs. Based on the implementation of appropriate erosion and sediment control measures as part of an approved SWPPP under the NPDES Construction General Permit, potential impacts related to erosion and sedimentation hazards from the project 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,		\boxtimes
	liquefaction or collapse?		

As discussed in responses VI(a)(iii) and VI(a)(iv), the project would not result in significant impacts associated with liquefaction, seismically induced settlement, or landslides. As identified in the City of San Diego Seismic Study, the project site is designated as Geologic Hazards Categories 51 and 52. Geologic Hazards Category 51 are areas of level mesas, underlain by terrace deposits and bedrock, with nominal geologic hazard risk. Category 52 are other level areas, gently sloping to steep terrain, favorable geologic structure, with low geologic risk. Given the Geologic Hazard Categories for the site, and the geologic conditions identified in the project geotechnical investigation (CTE, Inc. 2018), the project would not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project. The project would adhere to proper engineering design and standard construction practices consistent with the California Building Code. No impact would occur.



The project's geotechnical investigation identifies Quaternary Very Old Paralic Deposits (Unit 8) as the near surface geologic unit that underlies the site. Based on recent explorations, Quaternary

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Previously Placed Fill was observed overlying the Very Old Paralic Deposits at the project site. According to the project geotechnical investigation (CTE Inc., 2018), based on the generally granular nature of the subgrade materials, soils at the project site are anticipated to exhibit low expansion potential. Expansive soils are generally not anticipated to present significant adverse impacts to site development with proper implementation of geotechnical recommendations. Adherence to the geotechnical investigation recommendations as well as implementation of proper engineering design and standard construction practices in accordance with the applicable California Building Code guidelines, would reduce impacts to a less than significant level.

The project does not propose any septic tank or alternative waste water disposal systems. The project site is located within the wastewater service area for the City of San Diego Metropolitan Sewerage System and Wastewater Branch of the City of San Diego Public Utilities Department. No impact associated with soil suitability for supporting the use of septic tanks or alternative waste water disposal systems would occur.

VII. 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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Climate Action Plan

In December 2015, the City adopted the Climate Action Plan (CAP; City of San Diego 2015). With implementation of the CAP, the City aims to reduce emissions 15 percent below the baseline to approximately 11.1 million metric tons of carbon dioxide equivalent (MMT CO2E) by 2020, 40 percent below the baseline to approximately 7.8 MMT CO2E by 2030, and 5 percent below the baseline to approximately 6.5 MMT CO2E by 2035. The City has identified the following five CAP strategies to reduce greenhouse gas (GHG) emissions to achieve the 2020 and 2035 targets: (1) energy- and water-efficient buildings; (2) clean and renewable energy; (3) bicycling, walking, transit, and land use; (4) zero waste (gas and waste management); and (5) climate resiliency. The City's CAP Consistency Checklist, adopted July 12, 2016, is the primary document used by the City to ensure project-by-project consistency with the underlying assumptions in the CAP and thereby to ensure that the City would achieve the emission reduction targets identified in its CAP.

CAP Consistency Checklist

The project is consistent with the City's CAP, as demonstrated in the project's CAP Consistency Checklist prepared by Atlantis Group, dated November 2018. The CAP Consistency Checklist includes a three-step process to determine if a project would result in a GHG impact. Step 1 consists

Issue	Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	

of an evaluation to determine the project's consistency with existing General Plan, Community Plan, and zoning designations for the site. Step 2 consists of an evaluation of the project's design features compliance with the CAP strategies. Step 3 is only applicable if a project is not consistent with the land use and/or zone, but is also in a transit priority area to allow for more intensive development than assumed in the CAP.

Under Step 1 of the CAP Consistency Checklist, the project is consistent with the existing General Plan, Community Plan designations as well as zoning for the site. Therefore, the project is consistent with the growth projections and land use assumptions used in the CAP. Completion of Step 2 of the CAP Consistency Checklist demonstrates that the project would be consistent with applicable strategies and actions for reducing GHG emissions. This includes project features consistent with the energy and water efficient buildings strategy, as well as bicycling, walking, transit, and land use strategy. The project may include over 50 tenant-occupants and would be consistent with Transportation Demand Management (TDM) program requirements. The TDM measures for the project include the following outlined in the CAP Consistency Checklist:

- (1) Carpool/vanpool parking spaces will be provided in preferentially located areas (closest to building entrances) for use by qualified employees. These spaces will be signed and striped "Car/Vanpool Parking Only". Information about the availability of and the means of accessing the car/vanpool parking spaces will be posted on Transportation Information Displays located in back-offices, common areas or on intranets, as appropriate.
- (2a) The project will maintain an employer network in the SANDAG iCommute program and employees will be offered the opportunity to register for commuter ridematching provided through publicly sponsored services (e.g., SANDAG sponsored "iCommute Ridetracker" or similar program).
- (2b) The project will reduce the demand for trips by participating in the Veterans Affairs Veterans Transportation Program which dedicates Veterans Affairs resources to subsidize carpool, vanpool, and transit travel options.
- (2c) The project is within ¼-mile of numerous services that reduce the need to drive such as (see map in Attachment A):
 - Cafes, restaurants, and dry cleaners available in the Olympus Corsair project which is on the southwest corner of Aero Drive and Sandrock Drive;
 - Cafes, restaurants, and other commercial services such as cleaners and a barber shop in the commercial shopping center on the northwest corner of Aero Drive and Sandrock Drive;
 - A café located to the west in the building immediately adjacent to the project site; and
 - The Serra Mesa-Kearny Mesa Branch library which includes numerous resources such as computer and internet access to the east of the project site on the south side of Aero Drive.

Additionally, the project is 2,135 feet from the social security office and there are two bus stops that are 1,375 feet from each other which further provide access to the social security office while reducing trips.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Step 3 of the CAP Consistency Checklist would not be applicable, as the project is not proposing a land use amendment or a rezone. The CAP Consistency Checklist shows the project would be consistent with the requirements of the City's CAP; therefore, impacts from GHG emissions would be less than significant. Based on the project's consistency with the planned land use for the site and proposed implementation of applicable GHG reduction strategies, the project's contribution of GHGs to cumulative statewide emissions would be less than considerable. Therefore, the project's direct and cumulative GHG emissions would have a less than significant impact on the environment.

b)	Conflict with an applicable plan, policy,			
	or regulation adopted for the purpose of reducing the emissions of		\boxtimes	
	greenhouse gases?			

Refer to VII(a). The project has completed a CAP Consistency Checklist and is consistent with the requirements of the City's CAP. As such, the project would not conflict with an applicable plan, policy, or regulations adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be less than significant.

VIII. 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 bazardous		\boxtimes	
	transport, use, or disposal of hazardous			
	materials?			

Construction activities would likely require the use of limited quantities of hazardous materials such as fuels for construction equipment, oils, and lubricants. The long-term operation of the site would result in the use of small quantities of hazardous materials associated with cleaning and normal building maintenance/operation. These materials would be stored, handled, used, and disposed of in accordance with applicable regulations and requirements, and would not create a significant hazard to the public or environment. Additionally, normal operations of the proposed hospital annex would generate biomedical waste, similar to other medical-type land uses occurring in the area. Staff at the project would be familiar with the requirements of handling, transporting, and disposing of biomedical waste. Adherence to established regulatory requirements for the small amounts of hazardous materials that would be present at the project site during construction and operation would ensure impacts associated with hazardous materials would remain less than significant.

b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the		
	environment?		

Refer to VIII(a) above. Small amounts of hazardous materials would be present on the project site during construction and long-term operation of the site; however, these small quantities of materials are typical of construction and ongoing maintenance activities and would be similar to

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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materials used at other construction sites and other buildings during long-term operation. These materials would be handled in accordance with appropriate regulatory requirements for the transport, storage, use, and disposal of such materials. Any associated accidental release would likely be easily contained due to the small quantities that would be present. Project activities would be completed in compliance with regulations, including the proper use, transport, and disposal of hazardous materials. The handling of these materials in compliance with regulations would ensure that impacts associated with reasonably foreseeable and accident conditions involving the release of hazardous materials into the environment would remain less than significant.

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 nearest schools to the project site are Wegeforth Elementary School, located 900 feet southeast of the project site, and St. Columba Catholic School, located approximately 1,600 feet southeast of the project site. While Wegeforth Elementary School is located less than 0.2 mile from the project site, the project would comply with all regulations pertaining to biomedical waste, as described in VIII(b) and would not emit hazardous emissions or acutely hazardous materials or substances. As such, no impact associated with hazardous emissions near a school 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?				
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According to the California Department of Toxic Substances Control EnviroStor Database, there are no listed hazardous materials sites for the subject property or within a 1,000-foot radius of the project site. As such, no impact would occur.

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 result in a safety hazard for people residing or working		\boxtimes	
	in the project area?			

The closest airport to the project site is the Montgomery Field, which is located directly north of the site, across Aero Drive. The project site is located within Safety Zone 6 (Traffic Pattern Zone) and Review Area 1 of Airport Influence Area (AIA) for the Montgomery Field (Montgomery Field Airport Land Use Compatibility Plan [ALUCP], Exhibits III-2 and III-5, respectively). Review Area I consist of locations where noise and safety concerns may necessitate limitations on the types of land use actions. Within Review Area 1, all land use actions are subject to review by the San Diego Airport Land Use Commission. Table III-2 of the Montgomery Field ALUCP identifies compatibility of different land uses for each of the Safety Zones identified for Montgomery Field. According to

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Table III-2 of the Montgomery Field ALUCP, hospitals, health care centers, mental hospitals, and other medical facilities (except doctor's offices) are allowed in Safety Zone 6, with no limits. Thus, the project is consistent with the uses allowed for the site in the ALUCP. The City's General Plan and the LDC contain regulations to ensure development proposals are consistent with ALUCP policies. The proposed uses are considered consistent with the ALUCP and would not result in a safety hazard for people residing or working in the area. Impacts would be less then significant.

The FAA, under Code of Federal Regulations (CFR) Title 14, Part 77, Safe, Efficient Use and Preservation of the Navigable Airspace, requires submittal of a Notice of Construction or alteration for applicable projects within Noticing Surface Areas for airports. The project site is located within the Part 77 Airspace Surfaces area and FAA Height Notification Boundary Area for Montgomery Field (Montgomery Field ALUCP Exhibit III-3). Applicable proposed development within these areas require review and approval from appropriate oversight agencies (including the FAA and San Diego Airport Land Use Commission) prior to the issuance of approvals such as building permits. Based on mandatory compliance with FAA regulatory criteria and San Diego Airport Land Use Commission review, potential impacts associated with air traffic safety would be less than significant.

f)	For a project within the vicinity of a		
	private airstrip, would the project result in a safety hazard for people residing		\boxtimes
	or working in the project area?		

The project site is not within the vicinity of a private use airstrip. No impact would occur.

g) Impair implementation of or physically	/		
interfere with an adopted emergency			
response plan or emergency			
evacuation plan?			

The project does not propose elements which would impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan. The proposed development would occur entirely within the project site, with some improvements occurring along and within the median of Aero Drive. During construction activities along Aero Drive, traffic access would be maintained, although lane closures may be required. A traffic control plan would be prepared for the project and would be subject to review and approval from the City prior to the start of construction. Construction activities and associated traffic restrictions on Aero Drive would be conducted according to City standards and the project's traffic control plan. In addition, during the long-term operation of the project, two access points (the two driveways along Aero Drive) to the project would be maintained, ensuring access for emergency response. As such, the project would not interfere with implementation of an emergency response or evacuation plan. No impact would occur.



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project site is within a developed, urbanized area and is surrounded by commercial and residential development. Based on the City of San Diego Fire-Rescue Department's Official Very High Fire Hazard Severity Zone Map (Grid 23; February 24, 2009), the project site is not located within the Very High Fire Hazard Zone or 300-foot brush buffer, although the adjacent property to the east is within Very High Fire Hazard Zone or 300-foot brush buffer. The project would be subject to applicable state and City regulatory requirements related to fire hazards and prevention, as well as incorporating applicable fire-related design elements including fire-resistant building materials, fire/ember/smoke barriers, automatic alarm and sprinkler systems, and provision of adequate fire flow and emergency access. Based on the described regulatory requirements related to fire Hazard Severity Zone, potential impacts associated with wildfire hazards from implementation of the project would be less than significant.

IX. HYDROLOGY AND WATER QUALITY - Would the project:

a) Violate any water quality standards or waste discharge requirements?

Potential impacts associated with water quality standards would include short-term constructionrelated erosion/sedimentation and long-term operational storm water discharge. A Storm Water Quality Management Plan (SWQMP; Ware Malcomb, dated September 20, 2018) was prepared for the project to address water quality. The SWQMP identifies the project as a Priority Development Project that is required to implement structural BMPS and hydromodification flow control requirements. Proposed site drainage would incorporate "no-infiltration" biofiltration BMPs and storage to meet pollution removal and flow control requirements. As less than 50% of the existing impervious areas would be replaced, the project would address only those areas being replaced and not the entire site. Runoff from the site development would be directed to three biofiltration BMPs to be located in landscaped areas. The project includes construction of an underground storage vault to collect outflows from all biofiltration BMPs. The vault would discharge water to the Aero Drive gutter. Half of the proposed parking structure drainage would not be captured in a water quality BMP. To compensate, an equivalent area of the existing commercial office building roof is included in water quality sizing and hydromodification flow controls for one of the discharge points. The project would implement the identified BMPs and hydromodification controls and would be required to comply with all storm water quality standards, including the City of San Diego's Storm Water Standards, storm water construction requirements of the State Construction General Permit, Order 2009-009-DWQ, and the Municipal Storm Water Permit, Order No. R9-2013-0001, during and after construction. Appropriate BMPs, as required, would be implemented. Compliance with the stormwater requirements identified above would ensure that no significant impacts related to water quality standards or waste discharge requirements would occur. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 does not require the use of groundwater, nor would it create substantial new impervious surfaces that would interfere with groundwater recharge. The project does not propose construction excavation greater than 8 feet. According to the geotechnical investigation for the project site (CTE, Inc. 2018), regional static groundwater is generally anticipated at depths greater than proposed excavations. No impact associated with groundwater supplies would result from implementation of the project.

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?		

A Preliminary Drainage Study (Ware Malcomb, dated September 21, 2018) was prepared to address drainage impacts for the project. The following analysis is based on that Preliminary Drainage Study.

Existing Drainage

Existing drainage at the project site is via surface sheet flow to three discharge points (discharge points A, B, and C), which are described below.

- Discharge Point A Runoff from the west portion of the site surface flows into the west driveway as well as north into Aero Drive through curb cuts on the west side of a high point in Aero Drive. Surface flow is conveyed west, approximately 2,000 feet to catch basins just west of Afton Road. A 60-inch storm drain conveys water to a concrete-lined open channel that parallels the east edge of Interstate 805 before passing under to a natural channel. The natural channel flows south to a storm drain facility that conveys water into the San Diego River at approximately Mission Center Road.
- *Discharge Point B* Runoff from the northeast portion of the site surface flows into Aero Drive through curb cuts and out of a driveway on the east side of a high point in Aero Drive. Surface flow is conveyed 1,200 feet east to a catch basin that discharges into an unnamed natural channel. Flow in the natural channel is conveyed under developments via storm drain and into the San Diego River at Interstate 805.

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• Discharge Point C – Runoff from the southeast portion of the site drains through the existing wall located in the southeast corner of the property and into the gutter of Ediwhar Avenue. Surface flow is conveyed into catch basins located about 2,000 feet south and east in Hammond Drive. Storm drains convey flow into the same unnamed natural channel. Flow in the natural channel is conveyed under developments via storm drain and into the San Diego River at approximately Interstate 805.

The San Diego River ultimately discharges to the Pacific Ocean just south of Mission Bay. There is no run-on to the site from adjacent properties.

Proposed Drainage

The project site would maintain existing condition drainage patterns to the maximum extent practical. Runoff from the parking garage top level would sheet flow into the existing parking lot. The proposed parking garage straddles the site high point that divides watersheds A and B. Half of the proposed parking garage would drain to Discharge Point A and the other half would drain to Discharge Point B. The portion of the garage draining to Discharge Point A would not be captured in a water quality BMP. To compensate, an equivalent area of the existing commercial office building roof is included in water quality sizing and hydromodification flow controls at Discharge Point B. Discharge Point B includes the additions to the existing building, as well as additional landscape and surface parking improvements. Drainage from these improvements would be conveyed via sheet flow into biofiltration with underdrain BMPs and into the hydromodification flow control detention BMP. The detention BMP would include an outlet structure with pump so that water can be discharged to street level as in the existing condition. Flows in excess of the ten-year storm would overflow the BMPs and be conveyed to Aero Drive via surface flow, as in the existing condition. Limited changes to Discharge Point C are anticipated as a result of the project. Landscaping would replace some surface parking along the south edge of the existing building.

Based on the Preliminary Drainage Study prepared for the project, the proposed drainage facilities are adequate to convey storm flows for the emergency overflow for the 100-year storm event, and satisfy the requirements set forth in the San Diego Drainage Design Manual. Water quality and hydromodification flow control BMPs would be implemented to satisfy the requirements of the NPDES permit locally regulated by San Diego Regional MS4 Permit (order R9-2013-0001), reissued by California Regional Water Quality Control Board in May 2013 and amended by Order R9-2015-0001 and R9-2015-0100 and as demonstrated in the SWQMP. As discussed above, the proposed storm drainage improvements and the existing storm drainage system would have adequate capacity to serve the project site. As such, the project would not result in substantial alteration of the existing drainage pattern which would result in substantial erosion or siltation on- or off-site. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			\boxtimes	

Refer to XI(c). The project would not result in the substantial alteration of the existing drainage pattern and would not result in flooding on- or off-site. Impacts would be less than significant.

e)	Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater		\boxtimes	
	drainage systems or provide substantial additional sources of			

Refer to XI(c). The project would not result in the creation of runoff water which would exceed the capacity of existing or planned stormwater drainage systems. The proposed storm drainage improvements and the existing storm drainage system would have adequate capacity to serve the project. Impacts would be less than significant.

f)	Otherwise substantially degrade water		
	quality?		

Refer to XI(c). The project would include structural BMPs for storm water pollutant control and would also be required to comply with the requirements of the NPDES permit and the San Diego Regional MS4 Permit. For these reasons, the project 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		\boxtimes
	Insurance Rate Map or other flood		
	hazard delineation map?		

The project does not involve the construction of housing or residential uses. In addition, the project site is not within a designated Federal Emergency Management Agency (FEMA) Floodplain or Floodway, per the most recent FEMA Flood Insurance Rate Map (FIRM) 06073C1617G, effective May 16, 2012. No impact would occur.

h)	Place within a 100-year flood hazard		
	area, structures that would impede or		\boxtimes
	redirect flood flows?		

Refer to XI(g). The project is not within a flood hazard area and would not place structures within a 100-year flood hazard area. No impact would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?				\boxtimes

The site is already developed and is surrounded by existing development. The proposed renovation and repurposing of the office building would not divide the established Kearny Mesa community. The site is designated for Industrial Employment land use by the City's General Plan (Figure LU-2) and is identified as Industrial and Business Parks land use in the Kearny Mesa Community Plan. The site is zoned IP-2-1, which allows a mix of light industrial and office uses. The proposed uses of the site would be consistent with the planned land use of the site. As such, the project would not physically divide an established community. No impact would occur.



The project site is designated Industrial and Business Parks in the Kearny Mesa Community Plan and zoned IP-2-1. The purpose of the IP zones is to provide for high quality science and business park development. The property development standards of the IP zone are intended to create a campus-like atmosphere characterized by comprehensive site design and substantial landscaping. The IP-2-1 zone, which the project site is designated for, allows a mix of light industrial and office uses. Hospitals, intermediate care facilities, and nursing facilities are permitted within the IP-2-1 zone with a Conditional Use Permit (CUP). The proposed use is consistent with the Community Plan land use designation and zoning for the site. The project would comply with the development regulations in the IP-2-1 zone and no deviations would be required.

As discussed in response VIII(e), the project site is located within Safety Zone 6 (Traffic Pattern Zone) and Review Area 1 of Airport Influence Area (AIA) for the Montgomery Field. Review Area I consist of locations where noise and safety concerns may necessitate limitations on the types of land use actions. Within Review Area 1, all land use actions are subject to review by the San Diego Airport Land Use Commission. According to Table III-2 of the Montgomery Field ALUCP, hospitals, health care centers, mental hospitals, and other medical facilities (except doctor's offices) are allowed in Safety Zone 6, with no limits. Thus, the project is consistent with the uses allowed for the site in the ALUCP and would be subject to review and approval by the San Diego Airport Land Use Commission.

The project site is located within the Part 77 Airspace Surfaces area and FAA Height Notification Boundary Area for Montgomery Field. Applicable proposed development within these areas require review and approval from appropriate oversight agencies (including the FAA and San Diego Airport Land Use Commission) prior to the issuance of approvals such as building permits.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project site is fully developed. The project site is not located within or adjacent to the MHPA and would not conflict with the City's MSCP. Additionally, there are no historical resources identified on the project site. As such, the project would not result in impacts associated with historical resources and would comply with the Historical Resources Regulations of the City.

Overall, the project would not conflict with any applicable plan in a manner that would result in significant secondary environmental impacts. No impact would occur.

c)	Conflict with any applicable habitat		
	conservation plan or natural		\boxtimes
	community conservation plan?		

The developed project site is not within the MHPA as designated under the City of San Diego MSCP Subarea Plan (City of San Diego 1997). No impact would occur.

XI. MINERAL RESOURCES – Would the project:

 Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? 				\boxtimes
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The project vicinity is already developed and is not in use for or planned for the recovery of mineral resources. The project site is not designated by the General Plan, Kearny Mesa Community Plan, or other local, state, or federal land use plan for mineral resources recovery; therefore, the project would not result in the loss of availability of known mineral resources. No impact would occur.

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?		\boxtimes

Refer to XI(a). No impact associated with mineral resources would occur.

XII. 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		\boxtimes	
	general plan or hoise ordinance, or			
	applicable standards of other agencies?			

The project would result in short-term noise associated with construction activities. Long-term noise generated at the site would result from noise associated with traffic trips to and from the facility, as well as noise typical of commercial/hospital buildings, such as heating/air conditioning equipment operation, truck deliveries, and parking lot noise. Applicable standards include noise/land use compatibility guidelines established in the City of San Diego General Plan as well as construction and operational standards established in the Noise Abatement and Control Ordinance.

Issue	Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Primary sources of existing noise in the project vicinity include noise associated with aircraft operations at Montgomery Field and vehicle traffic on local roadways.

Noise/Land Use Compatibility Standards

Table NE-3 of the General Plan Noise Element identifies different land uses within the City and noise levels that would be compatible, conditionally compatible, and incompatible with each land use. For institutional uses, such as hospitals and nursing facilities, 60 dBA Community Noise Equivalent Level (CNEL) is considered compatible, with noise levels of 60 to 65 dBA CNEL being conditionally acceptable and noise levels in excess of 65 dBA CNEL being incompatible. The proposed renovation of the existing commercial building for use as a hospital annex would result in noise at the project site similar to those that would have occurred for the existing office building and similar to those occurring at adjacent office buildings. Noise levels are not anticipated to exceed City's noise/land use compatibility standards for hospital uses or result in an impact related to noise exposure. Noise/land use compatibility impacts would be less than significant.

Construction Noise

Project construction would result in noise associated with construction equipment and activities as well as traffic noise from worker's vehicles and deliveries. Construction equipment noise includes diesel engine-driven construction equipment used for demolition, site preparation, and grading; removal of existing structures and pavement; loading, unloading, and placing materials at the site; and paving. The City regulates noise through the SDMC, Chapter 5, Article 9.5, Noise Abatement and Control. Pursuant to the City's Noise Abatement and Control Ordinance, construction activities must be limited to between the hours of 7:00 a.m. and 7:00 p.m. and noise levels may not exceed a 12-hour equivalent noise level (L_{eq}) of 75 A-weighted decibels (dB(A)) at or beyond the property line of a residentially zoned property. Properties immediately adjacent to the east and west are zoned for industrial uses (IP-2-1) and properties immediately adjacent to the south are zone for residential single-unit uses (RS-1-7). Compliance with the construction noise level limits and hours contained in the SDMC would ensure that construction noise impacts remain less than significant.

Operational Noise

Long-term noise generated from the project would include noise associated with vehicular trips to and from the site, as well as parking lot noise, heating/air conditioning equipment operation, truck deliveries, and other noises typical of medical use buildings. The Noise Abatement and Control Ordinance establishes general noise level limits based on land use type and time of day. Land uses in the vicinity of the project site include industrial and residential uses. General noise level limits are most strict at the property line of single-family residential uses. The project site is adjacent to single-family residential uses to the south. Noise level limits at the property line of single-family residential uses are 50 dB(A) L_{eq} in the daytime (7:00 a.m. to 7:00 p.m.), 45 dB(A) L_{eq} in the evening (7:00 p.m. to 10:00 p.m.), and 40 dB(A) L_{eq} at night (10:00 p.m. to 7:00 a.m.). Noise associated with the project would be similar to those that have occurred at the project site with the existing commercial office building (noise associated with traffic trips, parking lot activity, heating/air conditioning, and truck deliveries) and those occurring at adjacent industrial-zoned properties. The project includes a "No

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	
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Vehicle Blast Zone" along the driveway to the south of the existing building. Additionally, an existing CMU wall between the driveway access south of the building and the adjacent residences to the south would reduce noise levels associated with delivery trucks occurring on the south side of the existing building, similar to the existing condition. These measures, coupled with compliance with the requirements of the SDMC would ensure that operational noise impacts would be less than significant.

Based on the TIA prepared for the project, existing (2018) traffic volumes on Aero Drive immediately adjacent the project site (on Aero Drive between Sandrock Road and Ruffin Road) is 21,310 ADT. The project would generate a net increase in daily trips of 5,082 ADT. According to the City's CEQA Significance Determination Thresholds (Table K-1, *Relative Loudness*), a 3 dB increase in sound pressure level is considered the minimum change in noise levels that is detectable by the human ear. Additionally, a doubling of a noise source would have to occur to produce a 3 dB increase in noise levels (FHWA 2017). As such, traffic levels would have to double along roads in the project area for receptors to notice an increase in noise levels. The project's 5,082 ADT would not double traffic levels on area roadways. As such, the long-term operation of the project would not result in a substantial increase in permanent noise levels associated with project traffic. Impacts associated with traffic noise levels would be less than significant.



Construction equipment may create temporary vibrations in the immediate vicinity of the construction activity; however, these would be short term and would be localized in the immediate vicinity of the construction equipment. Project construction would comply with the City's Noise Ordinance, which would reduce potential effects associated with construction noise, including ground-borne vibration. The proposed hospital annex would not generate ground-borne vibration during its long-term operation. Impacts associated with vibration would be less than significant.

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

Refer to XII(a). Long-term noise sources at the project site would include parking activity, heating/air conditioning equipment operation, truck deliveries, and traffic trips to and from the site. As discussed in response XII(a), noise associated with the project would be similar to those that have occurred at the project site with the existing commercial office building (noise associated with traffic trips, parking lot activity, heating/air conditioning, and truck deliveries) and those occurring at adjacent industrial-zone properties. Compliance with the requirements of the SDMC would ensure that those impacts remain less than significant. Also, as discussed in response XII(a), project traffic would not create a detectable noise increase associated with traffic on Aero Drive and would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
 A substantial temporary or periodic increase in ambient noise levels in the project vicinity above existing without the project? 			\boxtimes	

Refer to XII(a). Compliance with the construction noise level limits and hours contained in the SDMC would ensure that temporary construction noise impacts remain less than significant.

The closest airport to the project site is Montgomery Field, located directly across Aero Drive from the project site. The project site is located within Review Area 1 of the Airport Influence Area (Montgomery Field ALUCP Exhibit III-5 – Compatibility Policy Map: Airport Influence Area). As shown on Exhibit III-1, *Compatibility Policy Map: Noise*, of the ALUCP, the project site is not within the identified noise contours (60 dB CNEL and greater) for the airport. As such, the project is not expected to result in the exposure of workers or site visitors to excessive noise levels associated with airport noise. No impact would occur.

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?				
proj	ect site is not within the vicinity of a	a private airs	trip. No impact wo	uld occur.	

XIII. POPULATION AND HOUSING - Would the project:

The

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

The project involves the renovation of an existing commercial office building for use as a hospital annex facility. The project does not include the addition of new homes to the area, and does not include the provision of new roadways, public utilities, or other infrastructure to previously unserved areas that would induce growth. While additional employment opportunities may result, the employment openings are expected to be filled by those already living in the community and surrounding areas and would not result in additional people moving to the region for employment purposes. Additionally, the project would serve patients already living in the area and would not attract or induce additional people to move to the region. Thus, the project would not induce substantial population growth either directly or indirectly. No impact would occur.

Ŀ	ssue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b)	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				

The project involves the renovation of an existing commercial office building. There are no existing residences at the project site, and as such, the project would not displace existing housing, nor require the construction of replacement housing elsewhere. No impact would occur.

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

The project involves the renovation of an existing commercial office building. There are no current residents living on site, and no change to the existing land use designations for the site are proposed. As such, the project would not displace substantial numbers of people, and would not require the construction of replacement housing elsewhere. No impact would occur.

XIV. 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			\boxtimes	
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Fire protection services in the project area are provided by the City of San Diego Fire-Rescue Department. The fire station nearest the site is Fire Station 28, located at 3880 Kearny Villa Road, approximately 0.8 mile northwest of the project site. The project involves the renovation and repurposing of an existing commercial office building that is currently vacant, but historically occupied. The project site is already served by the Fire-Rescue Department. The slight increase in square footage and the proposed uses of the building would not substantially change the demand for or level of fire protection services required for the site. As such, the project would not require the provision or alteration of a new or existing fire protection facility. Impacts would be less than significant.

ii)	Police protection			\boxtimes	
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The project would involve the renovation and repurposing of an existing building, which is already provided police protection services from the City of San Diego Police Department. Neither the uses proposed for the site nor the increase in building square footage would substantially change the level of police protection required at the site. Thus, the project would not require the provision or alteration of a new or existing police protection facility. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iii) Schools				\boxtimes

The project involves the renovation and repurposing of an existing commercial office building. The project does not propose any residential uses which would generate new students for area schools. As such, the project would have no impact on school facilities.

iv) I	Parks				\boxtimes
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The project involves the renovation and repurposing of an existing commercial office building. As such, the project would have no impact on existing park facilities, as the project would not introduce a new population that would require additional or expanded park facilities.



The project involves the renovation and repurposing of an existing commercial office building. The project would not result an increased demand or wear and tear on other public facilities and would not require the provision or alteration of a public facility. No impact would occur.

XV. 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?

The project involves the renovation and repurposing of an existing commercial office building that is currently vacant. The proposed hospital annex would not result in increased use of existing neighborhood or regional parks, as it would likely be staffed by people already living in the project vicinity. The project does not propose residential uses that would increase demand on local and regional parks. No impact would occur.

b)	Does the project include recreational		
	facilities or require the construction or		
	expansion of recreational facilities,		\boxtimes
	which might have an adverse physical		
	effect on the environment?		

See XV(a). The project does not include residential uses or uses that would increase demand for local or regional parks. As such, the project would not require the expansion of recreational facilities. No impact would occur.

Issue	2	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANS	SPORTATION/TRAFFIC – Would the project: Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, ncluding but not limited to ntersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?				

The following analysis is based on a TIA prepared for the project by LLG (November 2018).

The project would result in new traffic trips being generated from the project site. Although the existing building at the site is not currently occupied, it was occupied for over 30 years until the fourth quarter of 2016. As such, the TIA uses a modified baseline (based on the historical tenancy) for assessing transportation impacts of the project, by assuming a trip generation credit for the unoccupied office building. With the trip credit for the existing commercial building, the project is calculated to generate 5,082 driveway ADT (the number of trips generated by the site) with 175 additional AM peak hour trips (115 inbound/60 outbound) and 434 additional PM peak hour trips (156 inbound trips/278 outbound). The total cumulative trip generation for the project is 359 cumulative ADT with 109 fewer AM peak hour trips (111 fewer inbound trips/2 additional outbound) and 39 fewer PM peak hour trips (15 additional inbound trips/54 fewer outbound trips). To determine if the project would conflict with an applicable plan related to transportation, various intersections and roadway segments within the study area were analyzed for Level of Service (LOS) under the following scenarios: 1) Existing Conditions; 2) Existing Plus Project; 3) Near-Term (Year 2020) Analysis (with and without project); and 4) Long-Term (Year 2035) Analysis (with and without project).

LOS is the term used to denote the different operating conditions which occur on a given roadway segment under various traffic volume loads. It is a qualitative measure used to describe a quantitative analysis considering factors such as roadway geometries, signal phasing, speed, travel delay, freedom to maneuver, and safety. LOS provides an index to the operational qualities of a roadway segment or an intersection. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. A project is considered to have a significant impact if the new project traffic has decreased the operations of surrounding roadways by a defined threshold. The defined thresholds for roadway segments and intersections are based on the City of San Diego's CEQA Significance Determination Thresholds (refer to TIA Table 5-1 for traffic impact significance thresholds). For intersections and roadway segments affected by a project, a LOS D or better is considered acceptable under both direct and cumulative conditions.

The study area for the project includes 13 intersections and 12 street segments. Intersections and street segments along Aero Drive analyzed in the TIA include:

No Impact

Less Than

Significant

Impact

Intersections

- 1. Aero Drive/Convoy Street (signalized)
- 2. Aero Drive/Kearny Villa Road (signalized)
- 3. Aero Drive/Aero Court (signalized)
- 4. Aero Drive/Afton Road (signalized)
- 5. Aero Drive/Sandrock Road (signalized)
- 6. Aero Drive/Project Driveway (unsignalized)
- 7. Aero Drive/Corporate Court (unsignalized)
- 8. Aero Drive/Ruffin Road (signalized)
- 9. Aero Drive/West Canyon Avenue (signalized)
- 10. Aero Drive/Daley Center Drive (signalized)
- 11. Aero Drive/Murphy Canyon Road (signalized)
- 12. Aero Drive/I-15 Southbound Ramps (signalized)
- 13. Aero Drive/I-15 Northbound Ramps (signalized)

Street Segments

- 1. Convoy Street to Kearny Villa Road
- 2. Kearny Villa Road to Aero Court
- 3. Aero Court to Afton Road
- 4. Afton Road to Sandrock Road
- 5. Sandrock Road to Project Driveway
- 6. Project Driveway to Corporate Court
- 7. Corporate Court to Ruffin Road
- 8. Ruffin Road to West Canyon Avenue
- 9. West Canyon Avenue to Daley Center Drive
- 10. Daley Center Drive to Murphy Canyon Road
- 11. Murphy Canyon Road to I-15 Southbound Ramps
- 12. I-15 Southbound Ramps to I-15 Northbound Ramps

No analyses of freeway mainlines or ramp meters were included in the TIA since less than 50 and 20 peak hour trips would be added to these facilities, respectively.

Based on the TIA and the City of San Diego's significance criteria, a significant impact would occur at one intersection as a result of project implementation. All other analyzed intersections and roadway segments would have less than significant impacts associated with project implementation. As described in the TIA, the project would result in a significant traffic impact at the intersection of Aero Drive/Sandrock Road under the Existing + Project and Long-Term (Year 2035) Project conditions. A Mitigation Monitoring and Reporting Program (MMRP), as detailed in Section V of the Mitigated Negative Declaration (MND) would be implemented. With implementation of the MMRP, potential traffic impacts would be reduced to below a level of significance.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?		\boxtimes		

Refer to XVI(a). With implementation of mitigation contained in Section V, MMRP, of the MND, the project would not conflict with LOS standards or with a congestion management plan. With incorporation of mitigation, impacts would be reduced to below a level of significance.

C)	Result in a change in air traffic patterns,		
	including either an increase in traffic		
	levels or a change in location that		
	results in substantial safety risks?		

As indicated previously, the project is located within the Airport Influence Area (AIA) of Montgomery Field. The project site is within the FAA Part 77 Airspace Protection Noticing Area. The FAA, under CFR Title 14, Part 77, Safe, Efficient Use and Preservation of the Navigable Airspace, requires submittal of a Notice of Construction or alteration for applicable projects within Noticing Surface Areas for airports. The project site is also within the FAA Height Notification Boundary Area for Montgomery Field. Applicable proposed development within these areas require review and approval from appropriate oversight agencies (including the FAA and San Diego Airport Land Use Commission) prior to the issuance of approvals such as building permits. Based on mandatory compliance with FAA regulatory criteria, potential impacts associated with air traffic patterns would be less than significant.

d)	Substantially increase hazards due to a		
	design feature (e.g., sharp curves or		
	dangerous intersections) or		\boxtimes
	incompatible uses (e.g., farm		
	equipment)?		

The project does not propose a design feature or incompatible use that could substantially increase hazards. All project access would be designed to City standards, and as such, no impact would occur.

e)	Result in inadequate emergency		
	access?		

The project includes provisions for emergency response and evacuation by providing two points of primary access along Aero Drive. Additionally, the project site also has a legal easement to access Sandrock Road thru the contiguous properties to the west of the site. Access along Aero Drive and to Sandrock Road via the contiguous properties to the west would be maintained during construction activities. A traffic control plan would be implemented as a condition of approval during construction activities to ensure that adequate access is maintained. The traffic control plan would be subject to City review and approval prior to construction activities. During long-term operation of the project, the two driveways along Aero Drive would be maintained, assuring access for emergency response. No impact would occur.

I	ssue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f)	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?			\boxtimes	

There are existing Class II bike lanes along Aero Drive, between Convoy Street and Murphy Canyon Road. Class II bike lanes with buffers are also provided along Sandrock Road, which is approximately 700 feet west of the project site. Public transit is available in the project vicinity. There are a total of 11 stops on both sides of Aero Drive serviced by MTS routes 25 and 928. The stops along Aero Drive include Kearny Villa Road, Aero Court, Afton Road, Sandrock Road, Serra Mesa-Kearny Mesa Library, Corporate Court, Ruffin Road, West Canyon Avenue, Daley Center Drive, and Murphy Canyon Road. The transit stops along Aero Drive closest to the project site are the stops at Sandrock Road (approximately 700 feet west of the project site) and at the Serra Mesa-Kearny Mesa Library (approximately 700 feet east of the project site). There are two transit stops along Sandrock Road serviced by MTS route 928 at Aero Drive and Murray Ridge Road. Public access along Aero Drive would be maintained. The project would retain the existing sidewalks along Aero Drive and would result in the installation of a small amount of new sidewalk (consistent with City standards) at the location of a current driveway that is being removed. The project includes the provision of 25 short-term and 25 long-term bicycle storage racks. The project does not propose alterations to public transit or bicycle facilities and does not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the pedestrian or bicycle system or mass transit. Impacts would be less than significant.

XVII. 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		\boxtimes
	historical resources as defined in Public		
	Resources Code section 5020.1(k), or		

The project would not cause a substantial adverse effect to tribal cultural resources, as the project site is completely developed with a commercial office building. The building was constructed in 1980 and is not of an age to be considered historical. 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. No impact would result.

Issue		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
 b) A resource of agency, in it by substant significant p in subdivision Code section criteria set f Public Resont the lead age significance California N 	determined by the lead s discretion and supported ial evidence, to be oursuant to criteria set forth on (c) of Public Resources n 5024.1. In applying the forth in subdivision (c) of urce Code section 5024.1, ency shall consider the of the resource to a ative 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 (Public Resources Code § 21080.3.1(a)).

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. Nonetheless, in accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego provided formal notification to the lipay Nation of Santa Isabel and the Jamul Indian Village, both traditionally and culturally affiliated with the project area, requesting consultation via email on November 17, 2018. The lipay Nation of Santa Ysabel responded via email on November 18, 2018 and concurred with City staff's determination that impacts to Tribal Cultural Resources would not occur and that consultation under AB 52 would not be required. The Jamul Indian Village did not respond within the 30-day response period as required by AB 52. Based upon the review by City Staff and the response from The lipay Nation of Santa Ysabel, impacts to Tribal Cultural Resources are not anticipated.

XVIII. UTILITIES AND SERVICE SYSTEMS - Would the project:



Wastewater treatment is provided at the project site by the City's Metropolitan Wastewater System. The project site is currently developed and connected to and serviced by the City's wastewater system. All proposed waste and sewer facilities within the public right-of-way or public easement would be designed, constructed, or abandoned in accordance with the criteria established within the City of San Diego's current water and sewer facility design guidelines, regulations, standards and practices. The project is consistent with the planned uses for the site and is therefore considered in the overall projected wastewater generation of the project area. Impacts would be less than significant.

I	ssue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			\boxtimes	

The project site has been previously developed and is already served by water and wastewater providers. The project would include the construction of some new on-site utility infrastructure, the continued use of some existing infrastructure, and some infrastructure that would be abandoned in place. New utilities water and wastewater service would be installed to serve the parking garage. All utility infrastructure would be designed and constructed in accordance with the criteria established by the City of San Diego's current water and sewer facility design guidelines, regulations, standards, and practices. The project is in a developed area already served by utility infrastructure, on a developed site, and is consistent with the uses allowed at the site. As such, no new or expanded off-site facilities would be required, and impacts would be less than significant.

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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?

As discussed in IX(c), the proposed storm drainage improvements and the existing storm drainage system would have adequate capacity to serve the project site. Runoff from the parking garage top level would sheet flow into the existing parking lot. The proposed parking garage would straddle the site high point that divides watersheds A and B. Half of the proposed parking garage would drain to Discharge Point A and the other half will drain to Discharge Point B. The portion of the garage draining to Discharge Point A would not be captured in a water quality BMP. To compensate, an equivalent area of the existing commercial office building roof is included in water quality sizing and hydromodification flow controls at Discharge Point B. Discharge Point B includes the additions to the existing building, as well as additional landscape and surface parking improvements. Drainage from these improvements would be conveyed via sheet flow into biofiltration with underdrain BMPs and into the hydromodification flow control detention BMP. The detention BMP would include an outlet structure with pump so that water can be discharged to street level as in the existing condition. Flows in excess of the ten-year storm would overflow the BMPs and be conveyed to Aero Drive via surface flow, as in the existing condition. Limited changes to Discharge Point C are anticipated as a result of the project. Landscaping would replace some surface parking along the south edge of the existing building. The project would be designed so as to comply with the relevant stormwater requirements, including the State Construction General Permit, Order No. 2009-0009DWQ and the Municipal Storm Water Permit, Order No. R9-2013-0001. The project would not require new or expanded off-site facilities, and as such, impacts would be less than significant.

Is	sue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				\boxtimes

While the project would result in an increase of approximately 25,000 square feet of building area and the addition of a parking garage and new landscaping, the project would not demand an amount of water equivalent to or greater than a 500 dwelling unit project (such as a commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space), and therefore, would not trigger the requirement for the preparation of a water supply assessment as set forth in Section s10910 and 10912 of the California Water Code. Regional water planning documents utilize zoning and land use designations to determine water demand and to ultimately determine the entitlements needed to provide adequate water supply. The project would not alter the zoning or land use of the site and would result in the development of a use consistent with these designations. Therefore, the project would not result in a need to revise estimated regional water demands or alter existing entitlements and would not result in a need to alter existing water entitlements. No impact related to water supply entitlements would occur.

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?

The project site is currently developed. The project plans include all on-site wastewater improvements necessary to serve the project, and no off-site improvements would be required to provide wastewater treatment for the project. While the project proposes an increase in building area (approximately 25,000 square feet), this increase is not expected to substantially increase the amount of wastewater generated at 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		\boxtimes	
	needs?			

The City of San Diego has established a threshold of 40,000 square feet of development as generating sufficient waste (60 tons) to have a potentially cumulatively significant impact on solid waste services. Projects that exceed these thresholds are required to prepare a Waste Management Plan (WMP). A WMP was prepared for the project (November 7, 2018) and is intended to identify measures to reduce impacts associated with solid waste. The following analysis is based on the WMP prepared for the project.

The project would provide exterior refuse and recyclable material storage areas in accordance with City regulations (SDMC Chapter 14, Article 2, Division 8: Refuse and Recyclable Material Storage

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	

Regulations). A minimum of 492 square feet of storage area (246 square feet refuse storage area and 246 square feet of recyclable material storage area) is required for the project.

The demolition and construction phase of the project would occur over a period of 20 to 22 months. The demolition phase would include wall sawing for new windows/openings, and removal of portions of existing asphalt parking, walkway areas, and landscaping. Approximately 812 tons of waste are expected to be generated during demolition activities. A large portion of the material (approximately 618 tons) would be recycled, including trees, concrete, asphalt, foundations, building structure, masonry walls, curb and gutter, switch gear, and cable. Approximately 194 tons of debris from demolition activities would be disposed at Miramar Landfill, including non-usable lumber, drywall, glass, miscellaneous trash, roofing paper, broken roof tiles, and floor tile, for an overall diversion rate during demolition activities of approximately 76 percent. Construction activities would generate waste in the form asphalt and concrete, brick/masonry/tile, cardboard, carpet/ padding/foam, drywall, landscape debris, mixed construction and demolition (C&D) debris, roofing materials, scrap metal, unpainted wood and pallets, and garbage/trash. Construction debris would be separated on site into material-specific containers to facilitate reuse and recycling and to increase the efficiency of waste reclamation. Source separation at the construction site would (1) ensure appropriate waste diversion, (2) minimize costs associated with transportation and disposal, and (3) facilitate compliance with the C&D Debris Deposit Ordinance. Construction activities (excluding the demolition discussed above) would generate approximately 251 tons of waste. Of the 251 tons generated from construction activities, approximately 205 tons, or 82 percent, would be diverted for recycling/reuse. Approximately 46 tons, or 18 percent of the total waste generated, would be transported to Miramar Landfill, as waste.

During the long-term operation of the site, the hospital annex would generate approximately 236 tons of waste annually. Diversion activities during occupancy would achieve a 40 percent diversion rate. On-site recycling services and education regarding those services would be provided to all tenants that receive solid waste collection service, as required by SDMC Section 66.0707. Landscape maintenance would include the collection and disposal of green waste.

Based on the quantified waste generation and diversion rates discussed above, the project would exceed the 75 percent solid waste diversion rate for waste produced during the construction phases (including demolition). The project would, however, fail to meet the 75 percent waste reduction target annually once the project is occupied. Nonetheless, the project would fall below the City's CEQA Significance Determination Threshold (generation of more than 1,500 tons of solid waste materials) for direct impacts to solid waste facilities during construction (i.e., 194 tons of demolition material and 46 tons of construction materials to Miramar Landfill) and the project would exceed the 75 percent solid waste diversion rate for waste produced during construction by achieving a 76 percent diversion rate during demolition activities and an 82 percent diversion rate during construction activities.

Regarding cumulative impacts, the project would achieve an average 40 percent diversion of waste via source-separated recycling and would dispose of approximately 142 tons of waste per year once the building is occupied. This would exceed the City's CEQA Significance Determination Threshold (of 60 tons or more of waste) for cumulative impacts to solid waste services. Operational diversion rates

Issue Significant Significant No Impa Impact Incorporated	Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impa
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would be assured when the project provides trash and recycling storage space per the City Storage Ordinance and complies with the City Recycling Ordinance by providing adequate space, bins, and educational materials for recycling during project occupancy. The project would implement the provisions of its WMP as part of the construction and operational phases to offset its cumulative impacts related to the generation of more than 60 tons of waste. With implementation of the measures contained in the WMP, as well as implementation of the requirements contained in the SDMC, the project would result in a less than significant impact associated with solid waste.

g)	Comply with federal, state, and local			
	statutes and regulation related to solid		\boxtimes	
	waste?			

Refer to XVIII(f). With implementation of the strategies outlined in the WMP and compliance with all applicable City ordinances, solid waste impacts would be reduced to below a level of significance regarding collection, diversion, and disposal of waste generated from C&D, grading, and occupancy. As such, the project would comply with federal, state, and local statutes and regulations related to solid waste.

XIX. 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 pariade of California bittony or		
	major periods of California history or prehistory?		

The project site does not contain sensitive riparian habitat or other identified habitat communities. The site is within an urban area and contains existing development. Furthermore, the project site is not within a conservation area, as identified in the City of San Diego MSCP. The project would comply with the requirements of the MBTA and California Fish and Game Code, and as such, the project would result in less than significant impacts associated with special status species. There are no areas within the project site that may be used as a wildlife corridor for any native resident wildlife species, and since the site is already built out, construction and operation of the project would not interfere with the movement of any native resident or migratory fish. The site is not used as a native wildlife nursery, and is not located adjacent to or near any native wildlife nursery. The project site is not within a MHPA as designated under the City of San Diego MSCP Subarea Plan (City of San Diego MSCP 1997). Impacts would be less than significant.

Is	sue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 future projects)?				

As documented in this Initial Study Checklist, the project would result in less than significant impacts for all issue areas with the exception of transportation/traffic. Mitigation has been proposed to reduce impacts to less than significant, which would also ensure the project does not contribute to a cumulative impact. The project would comply with the City's CAP and thus, cumulative GHG emissions of the project would be less than significant. No other potentially significant cumulative impacts have been identified. As such, the project is not anticipated to contribute to potentially significant cumulative environmental impacts.

 \boxtimes

 c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

As discussed throughout this Initial Study Checklist, no hazardous conditions on the project site or in the surrounding area were identified that could adversely affect human beings. It is not anticipated that demolition or construction activities would create conditions that would significantly directly or indirectly impact human beings. Hazardous materials present at the site would be handled in accordance with applicable regulations for the transport, use, storage, and disposal of such materials, ensuring that no substantial adverse effect on human beings would occur. As described in this Initial Study Checklist, the project would not result in significant impacts associated with air quality, geology, hazards or hazardous materials, hydrology/water quality, or noise, and as such, would not result in an adverse effect on human beings, either directly or indirectly. Impacts would be less than significant.

INITIAL STUDY CHECKLIST REFERENCES

I. Aesthetics / Neighborhood Character

- City of San Diego General Plan
- Community Plans: Kearny Mesa Community Plan

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:

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 and 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:

- 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:

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
- Site Specific Reports:

Geotechnical Investigation, Proposed Hospital Annex, 8875 Aero Drive, San Diego, CA; Construction Testing & Engineering, Inc., April 30, 2018.

VII. Greenhouse Gas Emissions

Site Specific Report:

City of San Diego Climate Action Plan Consistency Checklist; VA Hospital Annex CAP Consistency Checklist Submittal Application, Atlantis Group, November 27, 2018.

VIII. Hazards and Hazardous Materials

- San Diego County Hazardous Materials Environmental Assessment Listing
- San Diego County Hazardous Materials Management Division
- FAA Determination
- State Assessment and Mitigation, Unauthorized Release Listing, Public Use Authorized
- Airport Land Use Compatibility Plan
- Site Specific Report:
- Other:

California Department of Toxic Substances Control EnviroStor Database, <u>https://www.envirostor.dtsc.ca.gov/public/</u>. Site accessed October 30, 2018.

IX. Hydrology/Drainage

- Flood Insurance Rate Map (FIRM) 06073C1617G
- 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 Reports:

Priority Development Project Storm Water Quality Management Plan (SWQMP), Hospital Annex Renovation, Ware Malcomb, September 20, 2018.

Preliminary Drainage Study for Protea Hospital Annex Renovation, Ware Malcomb, September 21, 2018.

X. Land Use and Planning

- City of San Diego General Plan
- Community Plan: Kearny Mesa Community Plan
- Airport Land Use Compatibility Plan
- City of San Diego Zoning Maps
- FAA Determination:
- 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
- City of San Diego General Plan
- 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
- Other:

Federal Highway Administration Highway Traffic Noise Analysis and Abatement Policy and Guidance, <u>https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide</u> <u>02.cfm</u>, updated August 24, 2017. Site accessed November 5, 2018.

Site Specific Report:

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:

Geotechnical Investigation, Proposed Hospital Annex, 8875 Aero Drive, San Diego, CA; Construction Testing & Engineering, Inc., April 30, 2018.

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
- 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
- Community Plan:
- San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
- San Diego Region Weekday Traffic Volumes, SANDAG
- Site Specific Report:

Transportation Impact Analysis, Aero Drive Veterans Affairs Facility, Linscott, Law & Greenspan, Engineers. November 29, 2018.

XVIII. Utilities

Site Specific Report: Waste Management Plan for 8875 Aero Drive – VA Hospital Annex
 Project, Protea Properties. November 7, 2018.

XIX. Water Conservation

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

XX. Water Quality

- Clean Water Act Section 303(b) list, http://www.swrcb.ca.gov/tmdl/303d_lists.html
- Site Specific Report:

Priority Development Project Storm Water Quality Management Plan (SWQMP), Hospital Annex Renovation, Ware Malcomb, September 20, 2018.

XXI. Other:



VETERANS AFFAIRS HOSPITAL ANNEX

2,000 Feet





Source: Ware Malcomb 2018

Site Plan

VETERANS AFFAIRS HOSPITAL ANNEX