



THE CITY OF SAN DIEGO

ENVIRONMENTAL IMPACT REPORT

Project No. 636444
SCH No. 2021100394

SUBJECT: All Peoples Church: The project consists of the development of a 54,476-square-foot (SF) sanctuary/multi-purpose building (under one roof) and a 71,010 square-foot two level parking garage (367 parking spaces). The project site is a 5.99-acre parcel located at the northeast corner of Interstate 8 (I-8) and College Avenue of the Navajo Community Plan area. The vacant site is outside the City's Multiple Species Conservation Program (MSCP) preserve, the Multi-habitat Planning Area. The proposed project would include a 900-seat church with accessory uses (i.e., Sunday school classrooms, offices, and a multi-purpose room/gym), a parking structure and surface parking, site improvements, and off-site improvements to College Avenue. Of the 900 seats, 587 seats would be fixed in place, and 3,690 SF would accommodate the remaining non-fixed seats. Congregation gatherings would primarily occur on Sundays; small group activities may occur during the weekdays or on Saturdays. No primary educational school spaces are proposed as part of the project. The project would also include on-site water quality basins to treat storm water runoff and a sewer/storm water connection to existing City facilities. The project would require City approval of a Community Plan Amendment (CPA) to modify the Navajo Community Plan, Planned Development Permit (PDP), Site Development Permit (SDP) and various easement vacations via the Process 5 process. (LEGAL DESCRIPTION: Portion of Lot 67 of Rancho Mission of San Diego, County of San Diego, State of California, as described in grant deed November 3, 1975 at document 76-306249) **The site is not included on any Government Code listing of hazardous waste sites.** APPLICANT: Kendall Laughlin, All Peoples Church

ENVIRONMENTAL DETERMINATION:

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

Based on the analysis conducted for the project described above, the City of San Diego, as the Lead Agency, has prepared the following Environmental Impact Report. The analysis addressed the following issue area(s) in detail: **Land Use, Biological Resources, Historical Resources, Noise, Visual Effects and Neighborhood Character, and Tribal Cultural Resources (TCRs).** The Environmental

Impact Report concluded that the project would result in significant but mitigated environmental impacts to **Biological Resources, Historical Resources; Noise; and TCRs**. All other impacts analyzed in the draft EIR were determined to be less than significant.

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

PUBLIC REVIEW DISTRIBUTION:

The following agencies, organizations, and individuals received a copy or notice of the draft Environmental Impact Report and were invited to comment on its accuracy and sufficiency. Copies of the Environmental Impact Report, the Mitigation Monitoring and Reporting Program and any technical appendices may be reviewed in the offices of the Development Services Department, or purchased for the cost of reproduction.

State of California

State Clearinghouse

CalTrans District 11 (31)

California Dept. of Fish & Wildlife (32)

Native American Heritage Commission (222)

City of San Diego

Central Library (81A)

Benjamin Branch Library (81D)

Historical Resources Board (87)

Mayor's Office (91)

Councilmember Raul Campillo, District 7

Other Interested Groups, Organizations, and Individuals

US Fish & Wildlife Service (23)

Sierra Club (165)

San Diego Audubon Society (167)

Mr. Jim Peugh (167A)

California Native Plant Society (170)

Endangered Habitats League (182A)

Carmen Lucas (206)

South Coastal Information Center (210)

San Diego Archaeological Center (212)

Save Our Heritage Organisation (214)

Ron Christman (215)

Clint Linton (215B)

Frank Brown – Inter-Tribal Cultural Resources Council (216)

Campo Band of Mission Indians (217)

San Diego County Archaeological Society, Inc. (218)

Kumeyaay Cultural Heritage Preservation (223)
Kumeyaay Cultural Repatriation Committee (225)
Native American Distribution (225 A-S)
University of California San Diego Library (134)
Navajo Community Planning Group (336)
San Carlos Area Council (338)
Del Gardens Senior Social Club (339)
Mission Trails Regional Park (341)
Malcolm A. Love Library (457)
Daily Aztec (459)
Richard Drury
Stacey Osborne
John Stump
Mark Nelson
Larry Dawon
Kris Dill
Josh Billauer
Linda Thompson
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Geraldine Luna
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Dana Stewart
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Jerett Sigrist
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Deanne Plamer

RESULTS OF PUBLIC REVIEW:

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



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Senior Planner
Development Services Department

8/31/2022
Date of Draft Report

Date of Final Report

Analyst: Courtney Holowach

ALL PEOPLES CHURCH PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT

SCH No. 2021100394; PROJECT No. 636444

AUGUST 2022

Prepared for:

City of San Diego
Development Services Department
Land Development Review
1222 First Avenue, MS 501
San Diego, CA 92101-4155

ALL PEOPLES CHURCH

DRAFT ENVIRONMENTAL IMPACT REPORT

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ABBREVIATIONS AND ACRONYMS

Abbreviation/Acronym	Definition
AB	Assembly Bill
ADA	Americans with Disabilities Act
ADD	Assistant Deputy Director
ADT	average daily trips
ADU	accessory dwelling units
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUCP	airport land use compatibility plan
AME	Archaeological Monitoring Exhibit
AMSL	above mean sea level
APCD	Air Pollution Control District
APN	Assessor's parcel number
BCME	Biological Construction Mitigation/Monitoring Exhibit
BI	Building Inspector
BMPs	best management practices
C&D	construction and demolition
CALGreen	California Green Building Standards
CAP	climate action plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
Caltrans	California Department of Transportation
CBC	California Building Code
CCR	California Code of Regulations
CD	construction document
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
cfs	cubic feet per second
City	City of San Diego
CM	Construction Manager
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society

Abbreviation/Acronym	Definition
CO	carbon monoxide
Community Plan	Navajo Community Plan
CPA	Community Plan Amendment
CRHR	California Register of Historic Resources
CSVr	Consultant Site Visit Record
cy	cubic yards
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DSD	City of San Diego Development Services Department
DU	dwelling unit
EAS	Environmental Analysis Section
ED	environmental designee
EIR	environmental impact report
ESAs	Endangered species acts
ESL	Environmentally Sensitive Lands
FHWA	Federal Highways Administration
FTA	Federal Transit Administration
GHG	greenhouse gas
HAP	hazardous air pollutant
HRA	health risk assessment
HRG	Historical Resources Guidelines
I-8	Interstate 8
I-15	Interstate 15
kBtu	thousand British thermal units
kWh	kilowatt-hours
LDC	Land Development Code
Ldn	day-night average level
Leq	equivalent noise level
LMA	local mobility analysis
Lmax	highest RMS sound pressure level within a measuring period
Lmin	lowest RMS sound pressure level within a measuring period
MBTA	Migratory Bird Treaty Act
MEI	maximum exposed individual

Abbreviation/Acronym	Definition
MLD	most likely descendant
MHPA	Multi-Habitat Planning Area
MMC	mitigation monitoring coordination
MMRP	Mitigation, Monitoring, and Reporting Program
MRZ	Mineral Resource Zone
MSCP	Multiple Species Conservation Program
MTS	Metropolitan Transit System
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NOP	Notice of Preparation
NO _x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O ₃	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OHP	Office of Historic Preservation
PDP	Planned Development Permit
PI	Principal Investigator
PM	particulate matter
PM _{2.5}	fine particulate matter
PM ₁₀	respirable particulate matter
PRC	Public Resources Code
project	All Peoples Church
RAQS	San Diego County Regional Air Quality Strategy
RCP	reinforced concrete pipe
RE	Resident Engineer
RMS	root mean squared
ROW	right-of-way
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCH	State Clearinghouse
SCIC	South Coastal Information Center
SDAB	San Diego Air Basin

Abbreviation/Acronym	Definition
SDAPCD	San Diego Air Pollution Control District
SDFD	City of San Diego Fire-Rescue Department
SDG&E	San Diego Gas & Electric
SDMC	San Diego Municipal Code
SDP	Site Development Permit
SDPD	San Diego Police Department
SDSU	San Diego State University
SDUSD	San Diego Unified School District
SF	square feet/square foot
SIP	State Implementation Plan
SLF	Sacred Lands File
SO _x	oxides of sulfur
STC	sound transmission class
TAC	toxic air contaminant
TM	Tentative Map
TPA	Transit Priority Area
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UTM	Universal Transverse Mercator
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
WMP	waste management plan
VOC	volatile organic compounds
WSA	water supply assessment
WSV	water supply verification

ES. EXECUTIVE SUMMARY

This summary provides a synopsis of the All Peoples Church Project (project), the results of the environmental analysis, and project alternatives considered in this Environmental Impact Report (EIR). This summary does not contain the extensive background and analysis contained in the various sections of the EIR.

The purpose of an EIR is to inform public agency decision makers and the general public of the potentially significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project (California Environmental Quality Act (CEQA) Guidelines Section 15121(a)). This EIR is an informational document for use by the City of San Diego (City), decision makers, and members of the general public to evaluate the environmental effects of the proposed project. This document complies with all criteria, standards, and procedures of CEQA and the CEQA Guidelines and the City's EIR Guidelines (City 2005a). The City is the lead agency for the project evaluated in this EIR. This document has been prepared as a project EIR pursuant to CEQA Guidelines Section 15161. This document represents the independent judgment of the City as lead agency (CEQA Guidelines Section 15050).

ES.1 Project Location, Setting, Objectives, and Description

The approximately 6-acre project site is vacant and located in the southern portion of the Del Cerro neighborhood in the Navajo Community Plan area in the city. The project site is located approximately 11 miles east of the Pacific Ocean, 7 miles northeast of downtown San Diego, approximately 3 miles east of Interstate 15 (I-15) and immediately north of Interstate 8 (I-8). The project site is bounded by College Avenue on the west, the westbound I-8 off-ramp at College Avenue and City fee-owned open space dedicated parkland to the south, single-family neighborhoods along Marne Avenue and the western end of Glenmont Street to the east, and neighborhood commercial properties to the north fronting Del Cerro Boulevard.

The project site is previously disturbed and vacant. The project site contains 4.0 acres of sensitive biological resources, such as Diegan coastal sage scrub and non-native grassland, that are defined as Environmentally Sensitive Lands (ESL) in San Diego Municipal Code (SDMC) Section 113.0103. On-site grading appears to have been conducted in multiple phases along the western, southern and eastern edges of the site and may have occurred as part of community buildout in the late 1950's to mid-1960's during construction of the adjacent residential development to the east, College Avenue to the west, I-8 (previously Highway 80) and associated College Avenue off-ramp to the south and southwest. The vacant project site is surrounded by developed lands, with the exception of a 2-acre dedicated parkland property fee-owned by the City Parks and Recreation situated immediately to the south between the project site and the California Department of Transportation (Caltrans) right-of-way (ROW).

The project objectives for the All Peoples Church Project are as follows:

1. Place the church/sanctuary in a central San Diego location that is both visible from and convenient to a regional freeway to facilitate church attendance.

2. Relocate to a church-owned property that has proximity to its existing congregation, including its members in City Heights, Mid-Cities, College Area, and Del Cerro.
3. Establish a place of worship that would accommodate the space needs of its staff and congregation.
4. Design the structures and site improvements to be sensitive to the existing topography and surrounding neighborhoods.
5. Address the parking needs on Sundays by constructing sufficient parking to accommodate the maximum projected parking demand.
6. Develop the church/sanctuary near where transit connections are readily available to its congregation.
7. Enhance the religious, spiritual and community-building activities, including Sunday School and adult education, through the design and character of the indoor and outdoor spaces.
8. Fulfill the institution's religious mission to be a multi-ethnic, multi-generational local church with a global vision.

The following entitlements are necessary for the project:

- A Community Plan Amendment (CPA) is proposed to allow for the development of a religious assembly use within the Single-Family residential land use designation. The CPA would place a new church symbol on the Other Community Uses map, Figure 24, of the Navajo Community Plan.
- A Planned Development Permit (PDP) is required to allow a use that is permitted by the land use plan but not allowed by the underlying zone. In addition, the PDP also permits deviations from the RS-1-7 zone development regulations.
- Site Development Permit (SDP) is required for the project to impact sensitive biological resources.
- A Tentative Map (TM) is proposed to facilitate the vacation and grading of easements.
- Numerous existing easements would be vacated by the TM. Specifically, existing sewer, telecom, and stormwater easements that cross the property would be abandoned. In addition, a portion of the access rights would be revested for the proposed signalized intersection and ingress/egress driveways along College Avenue and ROW would be dedicated to the City to accommodate the proposed parkway along the project frontage with College Avenue.

The City would use information contained in this EIR and supporting documentation in its decision to approve the required discretionary permits.

ES.1.1 Site Plan and Design Features

The project consists of the construction and operation of a 54,476-square-foot (SF) church/sanctuary building and a 71,010 SF, two-level parking garage and surface parking areas on an approximately 6-acre vacant site. The proposed project would include a 900-seat sanctuary space with accessory uses (i.e., Sunday school classrooms, offices, and a multi-purpose room/gym), and various site

improvements, such as circulation, landscaping, and utility connections which are described below. Of the 900 seats, 587 seats would be fixed in place and 3,690 SF would accommodate the remaining non-fixed seats. Congregation gatherings would primarily occur on Sundays; small group activities may occur during the weekdays or on Saturdays. No primary educational school spaces are proposed as part of the project. To implement the project, several deviations from the RS-1-7 zone related to building height, retaining wall height, side yard setback, and bicycle parking are proposed.

The church/sanctuary building is designed in a contemporary Spanish Colonial Revival-style theme featuring arched entrances and windows along its painted concrete tilt-up facades, with accents of wood fascia and terra-cotta-colored tile roofing materials. The glazing for each window would be tinted bronze in color. The building would feature two levels with front and rear vestibules located on the first floor. The majority of the church/sanctuary building and its parapet wall around the flat roof areas would comply with the 30-foot height limit established in the SDMC for the RS-1-7 zone. To create visual interest, three pitched roof towers would extend from 45 to 48 feet above grade and the cross would extend an additional 8 feet above the 45-foot roof tower on the western elevation to 53 feet above grade. The additional height requires a deviation.

The two-level parking structure would be recessed into the terrain such that the top deck would be below grade of College Avenue. The lower and upper parking levels of the structure would be connected through an internal vehicle ramp. The primary surface parking lot would be constructed north of the parking structure at grade with College Avenue and connected to the upper level of the parking structure via internal roads. Smaller surface parking areas would be provided south and east of the parking structure and church/sanctuary building as shown on the project site plan (refer to Figure 3-1 in Chapter 3, *Project Description*). The parking structure would contain 203 parking spaces, while surface parking areas would hold 153 spaces, for a total of 356 parking spaces. Parking would be provided for standard vehicles, accessible vehicles, clean air vehicles, carpool vehicles, electric vehicles, motorcycles, and bicycles. The number of parking spaces for vehicles would exceed the City's minimum parking requirements of 319 parking spaces by 37 parking spaces. Refuse/recycling areas would be provided in the surface parking area east of the church/sanctuary building.

The design of the parking structure would complement the architectural style of the church/sanctuary building by featuring painted concrete walls with arched entries. The upper deck of the parking structure would feature planters with landscaping.

The proposed landscape plan features the use of native/naturalized and/or drought-tolerant plant material, whenever possible. No invasive or potentially invasive species would be used. In general, the landscape improvements along College Avenue would create a 14- to 16-foot-wide parkway featuring a 12-foot-wide shared sidewalk and street side canopy plantings and ground covers from the property line north to the private driveway. North of the private driveway, a 10- to 12-foot-wide parkway would be installed, consisting of street side canopy plantings and a 5-foot-wide sidewalk. Entry monumentation and landscape treatments would be installed on site at the southeast corner, near the driveway entrance.

Approximately 93 percent of the project site would be graded to accommodate development of the project. Approximately 16,500 cubic yards (CY) of cut and 39,000 CY of fill (including 22,500 CY of import) would be required to implement the grading plan. The maximum depth of excavation would be 25.5 feet, as measured vertically, and the maximum depth of fill would be 28 feet. To implement

the site plan and avoid the need to obtain an encroachment permit for grading into the Caltrans ROW, retaining walls are proposed along the southern and southwestern limits of grading. The walls would exceed the six-foot height limit allowed by the City's Land Development Code (LDC) and would require approval of a deviation. Landscape screening and vining species would be installed above and below the retaining walls to soften their appearance.

Vehicular access to the project and the parking structure would be via a proposed signalized full access driveway along College Avenue with a secondary gated driveway entrance connected to the northern parking lot for right-in/out only vehicle movements. Off-site improvements to the new College Avenue intersection would include creating a median break and narrowing of the existing raised median to construct a new southbound left-turn lane, striping of a northbound right-turn lane, and installing a crosswalk. A traffic signal would be installed at the proposed southern project driveway. The private driveway connection at College Avenue would descend to an entry plaza between the parking structure and the church/sanctuary building and the entrances to the proposed parking areas. An onsite loading zone would also be provided near the entry plaza. New bicycle lane signage and striping would be installed along northbound College Avenue. Along the project's College Avenue frontage, a 12-foot shared (i.e., pedestrians and bicycles) contiguous sidewalk would be installed south of the project driveway and north of the driveway a 5-foot-wide non-contiguous sidewalk would be constructed within the parkway. Canopy trees and other plant material would be installed adjacent to the sidewalks and surface parking area per City requirements. Stairs and an Americans with Disabilities Act ramp would be extended on site to link the College Avenue sidewalk to the church/sanctuary building entrance and entry plaza. Bicycle parking and storage would be provided on the project site consisting of 18 short-term spaces and 3 long-term spaces.

ES.1.2 Utilities and Other Site Improvements

Several on-site and off-site utility improvements would be required to implement the project. A 320-linear-foot, 8-inch-diameter public water main extension would be installed along College Avenue to a point of connection at its intersection with Del Cerro Boulevard. On-site improvements would include the installation of 2-inch-diameter public domestic water service connection; an 8-inch-diameter private water line for fire service; a 1-inch-diameter irrigation line; an 8-inch-diameter private gravity sewer line; and a private sewer lift station and private sewer force main. Many of these utility improvements would connect with existing public infrastructure in College Avenue, with the exception of the sewer service which would connect off site through an adjacent private residential lot via a private 4-inch-diameter sewer lateral to an 8-inch-diameter off-site public sewer main in Marne Avenue (i.e., within a private easement granted to the project). On-site stormwater runoff would be directed to four biofiltration basins and then discharged into existing storm drains and picked up by the existing headwall and public 48-inch storm drain that flows beneath I-8.

ES.1.3 Sustainable Design

The project has been designed to promote sustainability and includes cool green roofs, use of low-flow fixtures/appliances and low-flow irrigation, electrical vehicle charging stations, designated and secure bicycle parking spaces, designated parking spaces for low-emitting, fuel efficient, and carpool/vanpool vehicles, and implementation of a solid waste recycling plan. The project landscape plan also proposes to install a net increase of 92 trees to facilitate the City's Climate Action Plan

(CAP) goals for greenhouse gas emissions reduction and the enhancement of carbon sequestration opportunities.

ES.2 Environmental Analysis

This EIR contains an environmental analysis of the potential impacts associated with implementation of the proposed project. The issues that are addressed in detail in the EIR include Land Use, Biological Resources, Historical Resources, Noise, Visual Effects and Neighborhood Character, and Tribal Cultural Resources (TCRs). Based on the analysis contained in Chapter 5, *Environmental Analysis*, the project would result in the potential for significant impacts to biological resources (sensitive habitats), historical resources (unknown archaeological and religious or sacred resources, human remains); noise (construction noise); and TCRs. Measures have been identified in Chapter 5 that would reduce these project impacts to below significance with mitigation incorporated. Project impacts to land use and visual effects/neighborhood character would be less than significant, as described in Chapter 5, and as such, no mitigation for land use or visual effects and neighborhood character impacts would be required.

Chapter 6, *Cumulative Impacts*, addresses the cumulative impacts due to implementation of the proposed project in combination with past projects and future development projections. As described in Chapter 6, the project would not contribute to cumulatively considerable effects for Land Use, Biological Resources, Historical Resources, Noise, Visual Effects and Neighborhood Character, or TCRs. No mitigation for cumulative effects would be required.

As explained in Section 7.1, *Effects Found Not to Be Significant*, the project would not have the potential to cause significant impacts for the following 15 issue areas: Agriculture and Forestry Resources, Air Quality, Energy, Geologic Conditions, Greenhouse Gas Emissions, Health and Safety, Hydrology, Mineral Resources, Paleontological Resources, Population and Housing, Public Services and Facilities, Transportation, Utilities and Service Systems, Water Quality, and Wildfire.

Table ES-1, *Project Impacts and Proposed Mitigation*, summarizes the project's potentially significant direct and cumulative environmental impacts and required mitigation measures by issue, as analyzed in Chapters 5 and 6 of this EIR. The last column of the table indicates whether the impact would be reduced to below a level of significance after implementation of the mitigation measures.

ES.3 Project Alternatives

Three project alternatives are addressed in detail in this report: No Project/No Development, Reduced Residential Development Alternative, and Reduced Project Alternative. A summary of these alternatives is presented below with the detailed analysis provided in Chapter 8, *Project Alternatives*. Pursuant to CEQA Guidelines Section 15126(e)(2), the Reduced Project Alternative is identified as the environmentally superior alternative based on the fact that it would reduce the project's potentially significant, but mitigable, biological resources, historical (cultural) resources and TCR impacts by reducing the extent of grading required to implement the project. It would also increase the setback distance between construction activities and the nearby sensitive receptors, thus reducing construction noise impacts of the project.

ES.3.1 No Project/No Development Alternative

Pursuant to CEQA Guidelines Section 15126.6(e)(3)(B), the No Project Alternative is the “circumstance under which the project does not proceed.” Under the No Project/No Development Alternative for this EIR, construction of a new church/sanctuary building would not occur. The site would remain vacant. Because a new church/sanctuary building would not be constructed, this alternative would not achieve the project’s basic objectives related to relocating the facility to a church-owned property that has proximity to its existing congregation; establishing a place of worship that would accommodate the space needs of its staff and congregation; addressing the parking needs on Sundays by constructing an on-site parking structure; developing the church/sanctuary near where transit connections occur; and enhancing the religious, spiritual, and community-building activities through the design and character of the indoor and outdoor spaces.

ES.3.2 Reduced Residential Development Alternative

Under this alternative, the property would be developed with the Marburn Corporation residential subdivision which was approved by the City Council in 2018 (Project No. 435438). Similar to the project, this alternative required approval of a SDP, PDP, Easement Vacations, and TM. Similar to the project, several deviations from the LDC are needed to implement this alternative. A CPA is not required to implement the residential development. The Reduced Residential Development Alternative consists of the construction of 24 residential units, five homeowner association lots, private access to the property, and other site improvements. The alternative also includes 12-foot-high masonry walls around the site perimeter with landscape screening. Nearly the entire project site would be graded to implement this alternative.

ES.3.3 Reduced Project Alternative

In an effort to reduce the potentially significant, but mitigable, impacts associated with constructing the project, a Reduced Project Alternative is evaluated that would reduce the amount of on-site grading required to implement the project. A reduced grading footprint would, in turn, reduce the project’s potentially significant impacts to biological resources, cultural resources and TCRs. Under the Reduced Project Alternative, the project’s surface parking would be modified to comply with the City’s parking regulations, rather than constructing 37 more parking spaces than required by the City. Specifically, the Reduced Project Alternative would construct a total of 319 parking spaces, which would be 37 fewer spaces than the project provides. Surface parking for the project is proposed north of the parking structure and along the eastern edge of the parking structure and church/sanctuary building. To construct 37 fewer parking spaces, the project’s grading footprint would be reduced by approximately 0.4 acres, depending on which spaces are removed under this alternative. All other features of the project would remain the same as described in Chapter 3, *Project Description*.

ES.4 Areas of Controversy/Issues to Be Resolved

As lead agency, the City prepared and circulated a Notice of Preparation (NOP), dated October 22, 2021, to all responsible and trustee agencies, as well as various governmental agencies, including the Office of Planning and Research’s State Clearinghouse. Comments on the NOP were received

from the California Department of Fish and Wildlife, Native American Heritage Commission, San Diego County Archaeological Society, Inc., and various members of the public. Copies of the NOP and comment letters are contained in **Appendix A** of this document.

The concerns raised during the NOP process from governmental agencies and groups were primarily related to potential effects on biological, Native American, and historical resources. Additional concerns raised by the public included the existing housing shortage and the loss of potential housing associated with the CPA to allow for the development of a religious assembly use within the Single-Family residential land use designation; maintaining the single-family residential character of the project area; the project's consistency with applicable General Plan and Navajo Community Plan Elements; impacts associated with air quality, biological resources, Multiple Species Conservation Program Preserve and Multi-Habitat Planning Area, construction traffic, energy, geology, hydrology, land use, community character, noise, light, public services and facilities, toxic and human health, water quality, water supply, historical and cultural resources, cumulative effects, and climate change; the increase in traffic in the project area that would occur as a result of the project; potential use of existing vacant buildings to house the proposed use instead of constructing new structures; loss of existing, vacant land; health and safety impacts associated with traffic increases and associated air quality; wildfire threat and the addition of project cars to area roadways for emergency evacuation; and noise associated with project vehicles and events.

Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION

Impact	Mitigation Measures	Analysis of Significance after Mitigation
Land Use		
All land use impacts would be less than significant, and no mitigation measures are required.		
Biological Resources		
Project construction would result in significant direct and indirect impacts to sensitive habitat.	<p>BIO-1: Biological Resource Protection during Construction.</p> <p>I. Prior to Construction</p> <p>A. Biologist Verification – The owner/permittee shall provide a letter to the City’s Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City Biology Guidelines (City of San Diego 2018a), has been retained to implement the project’s biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.</p> <p>B. Preconstruction Meeting – The Qualified Biologist shall attend the preconstruction meeting, discuss the project’s biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.</p> <p>C. Biological Documents – The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.</p> <p>D. Biological Construction Mitigation/Monitoring Exhibit – The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME), which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City Assistant Deputy Director (ADD)/MMC. The BCME shall include a site plan, written and graphic depiction of the project’s</p>	With implementation of mitigation measure BIO-1 , impacts would be reduced to less than significant .

Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<p>biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.</p> <p>E. Resource Delineation – Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.</p> <p>F. Education – Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).</p> <p>II. During Construction</p> <p>A. Monitoring – All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on “Exhibit A” and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSV). The CSV shall be e-mailed to MMC on the first day of monitoring, the first week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.</p> <p>B. Subsequent Resource Identification – The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state or federal regulations have been determined and applied by the Qualified Biologist.</p>	

**Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION**

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	III. Post Construction Measures A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, CEQA, and other applicable local, state and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.	
Project construction would result in significant and direct impacts to 2.3 acres of Tier II Diegan coastal sage scrub, 0.9 acre of Tier II Diegan coastal sage scrub-disturbed, and 0.8 acre of Tier IIIB non-native grassland (a total of 4.0 acres).	BIO-2: Sensitive Habitats. Impacts to 4.0 acres of Diegan coastal sage scrub and non-native grassland shall be mitigated at ratios of 1:1 and 0.5:1 for impacts outside the Multi-Habitat Planning Area (MHPA) and mitigation inside the MHPA, respectively, pursuant to Table 3, <i>Upland Mitigation Ratios</i> , in the City's Biology Guidelines (City of San Diego 2018a). Mitigation shall be accomplished via payment into the City's Habitat Acquisition Fund equal to 3.6 acres of habitat.	With implementation of mitigation measure BIO-2 , impacts would be reduced to less than significant .
Historical Resources		
Ground disturbance associated with the construction of the project has the potential to uncover previously unknown archaeological and Native American resources, which would be a potentially significant impact to archaeological resources.	HR-1: Cultural Resources (Archaeological Resources) Protection during Construction. I. Prior to Permit Issuance A. <i>Entitlements Plan Check</i> 1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process. B. <i>Letters of Qualification have been submitted to ADD</i> 1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all	With implementation of mitigation measure HR-1 , impacts would be reduced to less than significant .

Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<p>persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.</p> <ol style="list-style-type: none"> 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG. 3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program. <p>II. Prior to Start of Construction</p> <p><i>A. Verification of Records Search</i></p> <ol style="list-style-type: none"> 1. The PI shall provide verification to MMC that a site-specific records search (0.25-mile radius) has been completed. Verification includes, but is not limited to, a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed. 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities. 3. The PI may submit a detailed letter to MMC requesting a reduction to the 0.25-mile radius. <p><i>B. PI Shall Attend Precon Meetings</i></p> <ol style="list-style-type: none"> 1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor. 	

Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<ul style="list-style-type: none"> a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring. 2. <i>Identify Areas to Be Monitored</i> <ul style="list-style-type: none"> a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation). 3. <i>When Monitoring Will Occur</i> <ul style="list-style-type: none"> a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur. b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present. III. During Construction <ul style="list-style-type: none"> A. <i>Monitor(s) Shall Be Present during Grading/Excavation/Trenching</i> <ul style="list-style-type: none"> 1. The Archaeological Monitor shall be present full time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances Occupational Safety and Health Administration safety requirements may necessitate modification of the AME. 	

Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<ol style="list-style-type: none"> 2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and Section IV.A-D shall commence. 3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present. 4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVr). The CSVr's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC. <p>B. Discovery Notification Process</p> <ol style="list-style-type: none"> 1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate. 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery. 3. The PI shall immediately notify MMC by phone of the discovery and shall submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible. 4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered. <p>C. Determination of Significance</p> <ol style="list-style-type: none"> 1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below. 	

Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<ul style="list-style-type: none"> a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground-disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply. c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required. <p>IV. Discovery of Human Remains</p> <p>If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (PRC) (Section 5097.98) and State Health and Safety Code (Section 7050.5) shall be undertaken:</p> <p>A. Notification</p> <ul style="list-style-type: none"> 1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process. 2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone. <p>B. Isolate Discovery Site</p> <ul style="list-style-type: none"> 1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be 	

Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<p>made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.</p> <ol style="list-style-type: none"> 2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance. 3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin. <p>C. <i>If human remains ARE determined to be Native American:</i></p> <ol style="list-style-type: none"> 1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call. 2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information. 3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes. 4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods. 5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if: <ol style="list-style-type: none"> a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR; b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN c. To protect these sites, the landowner shall do one or more of the following: <ol style="list-style-type: none"> (1) Record the site with the NAHC; 	

Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<p>(2) Record an open space or conservation easement; or</p> <p>(3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.</p> <p>D. <i>If human remains are NOT Native American:</i></p> <ol style="list-style-type: none"> 1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial. 2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC Section 5097.98). 3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner, any known descendant group, and the San Diego Museum of Man. <p>V. Night and/or Weekend Work</p> <p>A. <i>If night and/or weekend work is included in the contract:</i></p> <ol style="list-style-type: none"> 1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting. 2. The following procedures shall be followed: <ol style="list-style-type: none"> a. No Discoveries In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSV and submit to MMC via fax by 8 a.m. of the next business day. b. Discoveries All discoveries shall be processed and documented using the existing procedures detailed in Section III, During Construction, and Section IV, Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery. 	

Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<p>c. Potentially Significant Discoveries If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III, During Construction, and Section IV, Discovery of Human Remains, shall be followed.</p> <p>d. The PI shall immediately contact MMC, or by 8 a.m. of the next business day to report and discuss the findings as indicated in Section III.B, unless other specific arrangements have been made.</p> <p>B. <i>If night and/or weekend work becomes necessary during the course of construction:</i></p> <ol style="list-style-type: none"> 1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin. 2. The RE, or BI, as appropriate, shall notify MMC immediately. <p>C. <i>All other procedures described above shall apply, as appropriate.</i></p> <p>VI. Post Construction</p> <p>A. <i>Preparation and Submittal of Draft Monitoring Report</i></p> <ol style="list-style-type: none"> 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met. a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report. b. Recording Sites with State of California Department of Parks and Recreation. The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance 	

Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<p>with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.</p> <ol style="list-style-type: none"> 2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report. 3. The PI shall submit revised Draft Monitoring Report to MMC for approval. 4. MMC shall provide written verification to the PI of the approved report. 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals. <p>B. <i>Handling of Artifacts</i></p> <ol style="list-style-type: none"> 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued. 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate. 3. The cost for curation is the responsibility of the property owner. <p>C. <i>Curation of Artifacts: Accession Agreement and Acceptance Verification</i></p> <ol style="list-style-type: none"> 1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable. 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC. 3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV, Discovery of Human Remains, Subsection 5. <p>D. <i>Final Monitoring Report(s)</i></p>	

Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<ol style="list-style-type: none"> 1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved. 2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution. 	
Ground disturbance associated with the construction of the project has the potential to uncover previously unknown religious or sacred resources, resulting in a potentially significant impact associated with religious or sacred uses.	Mitigation measure HR-1 , as described above.	With implementation of mitigation measure HR-1 , impacts would be reduced to less than significant .
Ground disturbance associated with the project has the potential to uncover previously unknown resources, including unknown human remains, resulting in a potentially significant impact.	Mitigation measure HR-1 , as described above.	With implementation of mitigation measure HR-1 , impacts would be reduced to less than significant .

Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION

Impact	Mitigation Measures	Analysis of Significance after Mitigation
Noise		
<p>Construction noise impacts would have the potential to be significant, exposing nearby residential properties to noise levels in excess of 75 dBA average at the property line of residentially zoned properties.</p>	<p>NOI-1: Best Management Practices. The following best management practices shall be incorporated into the project drawings and implemented during project construction to ensure sustained construction noise levels do not exceed 75 decibels over a 12-hour period at the nearest sensitive receivers:</p> <ul style="list-style-type: none"> • In order to reduce construction noise, a temporary noise barrier or enclosure shall be used along the property lines of adjacent residences to break the line-of-sight between the construction equipment and the adjacent residences. The temporary noise barrier shall consist of a solid plywood fence and/or flexible sound curtains attached to chain-link fencing. • Barriers such as flexible sound control curtains shall be erected around stationary heavy equipment to minimize the amount of noise on the surrounding land uses to the maximum extent feasible during construction. • Equipping of all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment. • Electrical power shall be used to run air compressors and similar power tools, where feasible. • Internal combustion engines shall be equipped with a muffler of a type recommended by the manufacturer and in good repair. • All diesel equipment shall be operated with closed engine doors and be equipped with factory recommended mufflers. • Prohibiting unnecessary idling of internal combustion engines. • Locating stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors. Constructing temporary noise barriers to screen stationary noise-generating equipment when located near adjoining sensitive land uses. • Utilization of "quiet" air compressors and other stationary noise sources where technology exists. • Control of noise from construction workers' radios to a point where they are not audible at adjacent residences bordering the project site. • Notifying of all adjacent residences of the construction schedule, in writing, and provide a written schedule of "noisy" construction activities to the adjacent and nearby residences at least 24 hours prior to initiation of construction activities that could result in substantial noise levels at outdoor 	<p>With implementation of mitigation measure NOI-1, impacts would be reduced to less than significant.</p>

Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<p>or indoor living areas. This notification should include the anticipated hours and duration of construction and a description of noise reduction measures being implemented at the project site. The notification should include the telephone number and/or contact information for the on-site noise control coordinator that neighbors can use for inquiries and/or to submit complaints associated with construction noise.</p> <ul style="list-style-type: none"> • Designation of a noise control coordinator who shall be responsible for responding to any complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., bad muffler, etc.) and shall require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule. 	
Visual Effects and Neighborhood Character		
Project impacts to visual effects and neighborhood character would be less than significant, and no mitigation measures are required.		
Tribal Cultural Resources		
Ground disturbance associated with the project has the potential to uncover previously unknown resources, including unknown tribal cultural resources, resulting in a potentially significant impact.	Mitigation measure HR-1 , as described above.	With implementation of mitigation measure HR-1 , impacts would be reduced to less than significant .

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1. INTRODUCTION

1.1 Purpose and Legal Authority

This Environmental Impact Report (EIR) is an informational document intended for use by the City of San Diego (City) decision-makers and members of the general public in evaluating the potential environmental effects of the All Peoples Church (project). This document has been prepared in accordance with, and complies with, all criteria, standards, and procedures of the California Environmental Quality Act (CEQA) of 1970 as amended [Public Resources Code Section 21000 et seq.], CEQA Guidelines [Title 14, California Code of Regulations (CCR) Section 15000 et seq.], and the City of San Diego's EIR Guidelines (2005). This document represents the independent judgment of the City as lead agency (CEQA Guidelines Section 15050).

In accordance with CEQA Guidelines Section 15161 and as determined by the City, this document constitutes a "Project EIR." The project would construct a church/sanctuary building and associated site improvements on an approximately 6-acre undeveloped site in the southern portion of the Navajo Community Plan area. The project requires a Community Plan Amendment (CPA) to add church use to a residentially designated site; a Planned Development Permit (PDP) to allow deviations from the development regulations of the underlying residential zone, RS-1-7; Site Development Permit (SDP) to address sensitive biological resources onsite, a Tentative Map (TM), and an easement vacation.

This EIR provides decision makers, public agencies, and the general public with detailed information about the potential significant adverse environmental impacts of the project. By recognizing the environmental impacts of the project, decision makers will have a better understanding of the physical and environmental changes that would accompany implementation of the project. This EIR includes required mitigation measures that, when implemented, would reduce or avoid project impacts, to the extent feasible. Alternatives to the project are presented to evaluate feasible alternative development scenarios that can further reduce or avoid any significant impacts associated with the project. Refer to Chapter 8, *Project Alternatives*, for a description of the project alternatives.

1.2 EIR Scope

The public agency with the greatest responsibility for supervising or approving the project or the first public agency to make a discretionary decision to proceed with a proposed project should ordinarily act as the "lead agency" pursuant to CEQA Guidelines Section 15051(b)(1). The City is the lead agency for the project evaluated in this EIR.

This EIR contains a project-level analysis described in detail in Chapter 3, *Project Description*. A project EIR should "focus primarily on the changes in the environment that would result from the development project," and "examine all phases of the project, including planning, construction and operation" (CEQA Guidelines Section 15161). This EIR evaluates the potential short-term (during construction), long-term (operations), direct, indirect, and cumulative environmental impacts associated with the project.

This EIR is an informational document for use by the City, decision makers, and members of the general public to evaluate the environmental effects of the project. This document complies with all criteria, standards, and procedures of CEQA, the CEQA Guidelines and the City's EIR Guidelines and has been prepared as a EIR pursuant to CEQA Guidelines Section 15161. This document represents the independent judgment of the City as lead agency (CEQA Guidelines Section 15050).

1.2.1 Notice of Preparation

CEQA establishes mechanisms whereby the public and affected public agencies can be informed about the nature of the project being proposed and the extent and types of impacts that the project and its alternatives would have on the environment should the project or alternatives be implemented. Pursuant to CEQA Guidelines Section 15082, the City circulated a Notice of Preparation (NOP), dated October 22, 2021, to interested agencies, organizations, and individuals. The NOP was also sent to the State Clearinghouse (SCH) at the California Governor's Office of Planning and Research. SCH assigned a state identification number (SCH No. 2021100394) to this EIR. The NOP is intended to encourage interagency communication regarding the project so that agencies, organizations, and individuals are afforded an opportunity to respond with specific comments and/or questions regarding the scope and content of the EIR to be prepared.

Comment letters received during the NOP public scoping period expressed concerns related to land use, traffic, air quality and visual character. These concerns have been identified as areas of known controversy in the Executive Summary of this EIR. A copy of the NOP and letters received during its review are included in **Appendix A, Notice of Preparation and Comment Letters**, to this EIR.

Chapter 5, *Environmental Analysis*, and Chapter 6, *Cumulative Impacts*, of the EIR addresses in detail potentially significant direct, indirect, and cumulative environmental impacts associated with the following six topics:

- Land Use
- Biological Resources
- Historical Resources
- Noise
- Visual Effects and Neighborhood Character
- Tribal Cultural Resources (TCRs)

Project impacts with respect to Agriculture and Forestry Resources, Air Quality, Energy, Geologic Conditions, Greenhouse Gas Emissions, Health and Safety, Hydrology, Mineral Resources, Paleontological Resources, Population and Housing, Public Services and Facilities, Transportation, Utilities and Service Systems, Water Quality, and Wildfire are described in Section 7.1, *Effects Found Not to Be Significant*.

1.2.2 Project Baseline

CEQA Guidelines Section 15125 requires an EIR to include a description of the physical environmental conditions (i.e., environmental setting) for the project at the time the NOP is

published. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is “significant.” Baseline conditions for the undeveloped project site are established in Chapter 2, *Environmental Setting*.

1.3 Public Review Process

This EIR and the technical analyses it relies on are available for review by the public and public agencies for up to 45 days starting on August 31, 2022, to provide comments “on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated” (CEQA Guidelines Section 15204). The Draft EIR and associated technical appendices are posted on the City’s website:

<http://www.sandiego.gov/ceqa/draft>

The City, as lead agency, will consider the written comments received on the Draft EIR and comments made at the public hearing in making its decision whether to certify the EIR as complete and in compliance with CEQA, and whether to approve or deny the project, or take action on a project alternative.

Subsequent to certification of the EIR, agencies with permitting authority over all or portions of the project may use the EIR to evaluate environmental effects of the project, as they pertain to the approval or denial of applicable permits. CEQA Guidelines Section 15381 defines a responsible agency as all public agencies, other than the lead agency, that have discretionary approval power over the project. CEQA Guidelines Section 15386 defines a trustee agency as a state agency having jurisdiction by law over natural resources affected by a project, which are held in trust for the people of the state of California. At this time, there are no other agencies with permitting authority over the project, as described in Chapter 3, *Project Description*.

1.4 Content and Organization of the EIR

The content and organization of this EIR are in accordance with the most recent guidelines and amendments to CEQA and the CEQA Guidelines. Technical studies have been summarized within individual environmental issue sections and/or summary sections, and full technical studies have been included in the appendices to this EIR and are available for review during the public comment period.

This EIR has been organized in the following manner:

- The *Executive Summary*, provided at the beginning of the EIR, outlines the conclusions of the environmental analysis and a summary of the project as compared to the alternatives analyzed in this EIR. The Executive Summary also includes a table summarizing all identified environmental impacts, along with the associated mitigation measures proposed to reduce or avoid each impact. In addition, this section includes a discussion of areas of controversy known to the City, including those issues identified by other agencies and the public during the scoping process.
- Chapter 1, *Introduction*, provides an overview of the EIR, introducing the project, applicable environmental review procedures, and format of the EIR.

- Chapter 2, *Environmental Setting*, provides a description of the project location, an overview of the regional and local setting, and the physical characteristics (or baseline conditions) of the project site. The setting discussion also addresses the relevant planning documents and existing land use designations of the project site.
- Chapter 3, *Project Description*, provides a detailed description of the project, including its purpose, main objectives, project characteristics, project design, landscape and grading plans, circulation/access improvements, utility improvements, sustainable design features, and project construction. In addition, a discussion of discretionary actions required for project implementation is included.
- Chapter 4, *History of Project Changes*, chronicles the changes made to the project design in response to environmental concerns raised during the City's review of the project application.
- Chapter 5, *Environmental Analysis*, provides a detailed impact analysis for each environmental issue addressed in detail. For each topic, there is a discussion of existing conditions, regulatory setting, the thresholds identified for the determination of significant impacts, and an evaluation of the impacts associated with implementation of the project. Where the impact analysis demonstrates the potential for a significant adverse impact on the environment, mitigation measures that would minimize the significant effects are provided. The EIR indicates whether the mitigation measures would reduce impacts to below a level of significance.
- Chapter 6, *Cumulative Impacts*, addresses the cumulative impacts due to implementation of the project in combination with past projects and future development projections. The area of potential effect for cumulative impacts varies depending upon the type of environmental issue.
- Chapter 7, *Other CEQA Sections*, addresses environmental issues determined not to have the potential for significant adverse impacts as a result of the project. The section further addresses growth inducement and significant unavoidable impacts of the project; and significant irreversible environmental changes that would result from the project, including the use of nonrenewable resources.
- Chapter 8, *Project Alternatives*, provides a description and evaluation of alternatives to the project. This section addresses the mandatory "No Project" alternative, as well as development alternatives that would reduce or avoid the project's significant impacts.
- Chapter 9, *Mitigation Monitoring and Reporting Program*, contains the mitigation monitoring and reporting program (MMRP) for the project.
- Chapter 10, *References Cited*, contains the source materials and document references relied upon in the EIR analysis.
- Chapter 11, *Certification*, lists all individuals that participated in the preparation of this EIR.

2. ENVIRONMENTAL SETTING

This section provides a description of the existing physical conditions for the project site, as well as an overview of the planning context for the All Peoples Church (project). Details relative to the environmental setting for each environmental issue are provided at the beginning of each impact area presented in Chapter 5, *Environmental Analysis*.

2.1 Project Location

The approximately 6-acre project site is vacant and located in the southern portion of the Del Cerro neighborhood in the Navajo Community Plan area in the City of San Diego (City). The project site is located approximately 11 miles east of the Pacific Ocean, 7 miles northeast of downtown San Diego, approximately 3 miles east of Interstate 15 (I-15) and immediately north of Interstate 8 (I-8; refer to **Figure 2-1, Regional Location**, and **Figure 2-2, Project Location and Vicinity**). The project site is bounded by College Avenue on the west, the westbound I-8 off-ramp at College Avenue and City open space to the south, single-family neighborhoods along Marne Avenue and the western end of Glenmont Street to the east, and neighborhood commercial properties to the north fronting Del Cerro Boulevard. Regionally, the project site can be accessed from I-8 via the College Avenue interchange, while local access to the site is provided by College Avenue south of Del Cerro Boulevard. The California Department of Transportation (Caltrans) right-of-way (ROW) for the I-8 interchange occurs along the southern property line of the project site.

2.2 Existing Site Conditions

The approximately 6-acre project site consists of one legal lot (Assessor's Parcel Number [APNs] 463-010-10-00). The previously disturbed, and vacant project site is located within the RS-1-7 Zone and designated for Residential (Single-family) use by the Navajo Community Plan (refer to **Figure 2-3, Existing Zoning**, and **Figure 2-4, Community Plan Land Use**). The project site is in the Airport Land Use Compatibility Overlay Zone and Airport Influence Area (AIA) Review Area 2 for Montgomery Field, as depicted in the airport land use compatibility plan for the airport (San Diego Regional Airport Authority 2010). The project site is not located within or adjacent to a City of San Diego Multiple Species Conservation Program (MSCP) Multi-Habitat Planning Area (MHPA) (City of San Diego 1997). Several utility easements occur on the project site although the site is not currently served by utilities.

The project site contains 4.0 acres of sensitive biological resources, such as Diegan coastal sage scrub and non-native grassland, that are defined as Environmentally Sensitive Lands (ESL) in San Diego Municipal Code (SDMC) Section 113.0103. The site is not located within or near a 100-year floodplain. Topographically, the project site is generally lower in elevation than College Avenue, the I-8 westbound off-ramp, and the surrounding neighborhoods and community; the property elevations range from a high of 450 feet above mean sea level (AMSL) near the northern boundary to a low of 365 feet AMSL below the off-ramp. Based on historical aerial photographs dating back to the 1950s, portions of the site were previously graded to create its current topographic configuration. On-site grading appears to have been conducted in multiple phases along the western, southern and eastern edges of the site and may have occurred as part of community buildout in the late 1950s to mid-1960s during construction of the adjacent residential development to the east, College Avenue to the west, I-8 (previously Highway 80) and associated College Avenue

off-ramp to the south and southwest. Undocumented fill on the order of 2 to 30 feet deep were placed across the majority of the site as part of these prior grading activities (Advanced Geotechnical Solutions 2020). As such, the site's natural topography has been historically altered over time and no naturally occurring steep slopes occur on site. Refer to **Figure 2-5, Site Photograph**, which illustrates the current site conditions, **Figure 2-6, Existing Site Topography**, which illustrates the topography, and **Figure 2-7, Geologic Cross-Sections**, that shows the presence of artificial fill across large portions of the property.

The southern portion of the project site is located within a 2035 Transit Priority Area (TPA), as mapped by the San Diego Association of Governments (SANDAG) in accordance with Senate Bill (SB) 743 (City of San Diego 2019). Transit facilities that occur within a 0.5-mile walking distance of the project site include four bus stops. Specifically, two bus stops occur along College Avenue just north of Del Cerro Boulevard, and two bus stops are situated on College Avenue just south of Alvarado Road. Metropolitan Transit System (MTS) lists Bus Routes 14 and 115 within a 0.5-mile walking distance of the project site. Bus Route 14 has 60-minute headways listed for the a.m. and p.m. peak hours and Bus Route 115 has 30-minute headways listed for the a.m. and p.m. peak hours. On Sunday, Bus Route 14 does not have service and Bus Route 115 has 60-minute headways through the day. The San Diego State University (SDSU) trolley station is within a 1-mile walking distance of the project pedestrian access point. The Alvarado Road trolley station is over a 1-mile walking distance from the project site. Both stations are served by the Green Line trolley service operated by MTS.

2.3 Surrounding Land Uses

The vacant project site is surrounded by developed lands (refer to Figure 2-2), with the exception of a 2-acre dedicated parkland property fee-owned by the City Parks and Recreation situated immediately to the south between the project site and the Caltrans ROW. A neighborhood of single-family residences, neighborhood commercial businesses, and multi-family apartment residences is located to the northeast and east of the site. A commercial gas station with carwash is located immediately to the north, while a City-operated water pump station occurs northeast along Marne Avenue, south of the commercial area and adjacent to nearby residential. College Avenue is a four-lane divided and undivided community plan circulation element road and abuts the western project boundary. Across College Avenue are undeveloped hillsides and single-family residential development. The Caltrans ROW and College Avenue/I-8 interchange abut the project site to the south and southwest. In the project vicinity south of I-8 are the SDSU main campus and College Area community. The project site is located approximately 8 miles from Montgomery Field.

2.4 Planning and Regulatory Context

The project is subject to the planning guidelines and regulatory policies of state, regional, and local agencies. The following is a brief description of the applicable planning framework which is taken into consideration in the environmental analysis contained in Chapters 5, 6, and 7 of this report.

2.4.1 State Regulations

2.4.1.1 California Building Code (California Code of Regulations, Title 24)

California law provides a minimum standard for building design through the California Building Code (CBC). The CBC is a compilation of three types of building standards from three different origins:

- Building standards that have been adopted by state agencies without change from building standards contained in national model codes;
- Building standards that have been adopted and modified from national model codes to address California's ever-changing conditions; and
- Building standards, authorized by the California legislature, that constitute amendments not covered by national model codes, that have been created and adopted to address particular California concerns.

All occupancies in California are subject to national model codes adopted into Title 24, and occupancies are further subject to amendments adopted by state agencies and ordinances implemented by local jurisdictions' governing bodies.

2.4.1.2 Assembly Bill 52 (Native American Consultation)

Assembly Bill (AB) 52 amended the California Environmental Quality Act (CEQA) to require Tribal Cultural Resources to be considered as potentially significant cultural resources. It requires that CEQA lead agencies consult with tribes that have requested consultation at initiation of the CEQA process to identify and evaluate the significance of these resources. AB 52 applies to all CEQA environmental documents for which a Notice of Preparation (NOP) was filed on or after July 1, 2015. Details on the City's consultation for this project are provided in Section 5.3, *Historical Resources*, and Section 5.6, *Tribal Cultural Resources*.

2.4.2 Regional Plans

2.4.2.1 Montgomery Field Airport Land Use Compatibility Plan

The Airport Land Use Commission (ALUC) is an agency that is required by state law to exist in counties in which there is a commercial and/or a general aviation airport. The purpose of the ALUC is to protect public health, safety, and welfare by ensuring the orderly development of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports, to the extent that these areas are not already devoted to incompatible uses. The San Diego County Regional Airport Authority (SDCRAA) serves as the ALUC for Montgomery Field.

The Montgomery Field Airport Land Use Compatibility Plan (ALUCP) established the Airport Influence Area (AIA) for this airport. Essentially, the ALUCP serves as a tool for use by the SDCRAA in fulfilling its duty to review land use development proposals within the AIA at Montgomery Field. In addition, the ALUCP provides compatibility policies and criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances and to landowners in their design of

new development. The most recent version of the Montgomery Field ALUCP was amended in December 2010 (SDCRAA 2010). The project site is located within the AIA for the airport, whose airfield is approximately 7 miles to northwest.

2.4.2.2 Regional Air Quality Strategy

The San Diego Air Pollution Control District (APCD) and SANDAG are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the San Diego Air Basin. The San Diego County Regional Air Quality Strategy (RAQS) outlines the APCD's plans and control measures designed to attain the state air quality standards for ozone (O₃). The APCD has also developed the air basin's input to the State Implementation Plan (SIP), which is required under the federal Clean Air Act for areas that are out of attainment of air quality standards. The SIP, approved by the United States Environmental Protection Agency (USEPA) in 1996, includes the APCD's plans and control measures for attaining the O₃ national standard. Both the RAQS and SIP are generally updated on a triennial basis, with the latest update to the RAQS occurring in 2016, and to the SIP in 2020.

The RAQS relies on information from the California Air Resources Board and SANDAG, including mobile and area source emissions and information regarding projected growth in the County of San Diego, to project future emissions and then determine strategies necessary for the reduction of emissions through regulatory controls. The SIP relies on the same information from SANDAG to develop emission inventories and emission reduction strategies that are included in the attainment demonstration for the air basin. The SIP also includes rules and regulations that have been adopted by the APCD to control emissions from stationary sources. These SIP-approved rules may be used as a guideline to determine whether a project's emissions would have the potential to conflict with the SIP and thereby hinder attainment of the national air quality standard for O₃.

2.4.2.3 Water Quality Control Plan for the San Diego Basin

In 1994, the Regional Water Quality Control Board (RWQCB) adopted the Basin Plan, which is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan: (1) designates beneficial uses for surface and ground waters; (2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's anti-degradation policy; (3) describes implementation programs to protect the beneficial uses of all waters in the Region; and (4) describes surveillance and monitoring activities to evaluate the effectiveness of the Basin Plan [California Water Code Sections 13240 through 13244 and Section 13050(j)]. RWQCB periodically considers changes to the Basin Plan, at a minimum of every three years, and numerous amendments have been added the Basin Plan since 1994. Additionally, the Basin Plan incorporates by reference all applicable State and Regional Board plans and policies.

2.4.3 Local Regulations

2.4.3.1 City of San Diego General Plan

The City's General Plan is a comprehensive, long-term document that sets out a long-range vision and policy framework for how the City could grow and develop, provide public services, and

maintain the qualities that define San Diego. The General Plan comprises a Strategic Framework Element along with the following elements: Land Use and Community Planning; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; Noise; Historic Preservation; and Housing. The General Plan land use map identifies the project site as Residential (refer to **Figure 2-8, General Plan Land Use**). The General Plan lays the foundation for the more-specific community plans, which rely heavily on the goals, policies, and recommendations within the General Plan. Applicable goals, policies and recommendations from the General Plan are referenced in this Environmental Impact Report (EIR), where applicable.

2.4.3.2 City of San Diego Climate Action Plan

The Climate Action Plan (CAP) serves as the City's plan for the reduction of greenhouse gas (GHG) emissions in accordance with CEQA Guidelines Section 15183.5. Adopted December 2015, the CAP includes a municipal operations and community-wide GHG emissions baseline calculation from 2010 and sets a target to achieve a 15 percent reduction from the baseline by 2020, as required by California AB 32 (City of San Diego, 2015a). The CAP sets forth common-sense strategies to achieve attainable GHG reduction targets and outlines the actions the City will undertake to achieve its proportional share of state GHG emission reductions.

Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP. In July 2016, the City adopted the CAP Consistency Checklist (checklist) to provide a streamlined review process for the analysis of potential GHG impacts from future new development. The checklist was revised in June 2017.

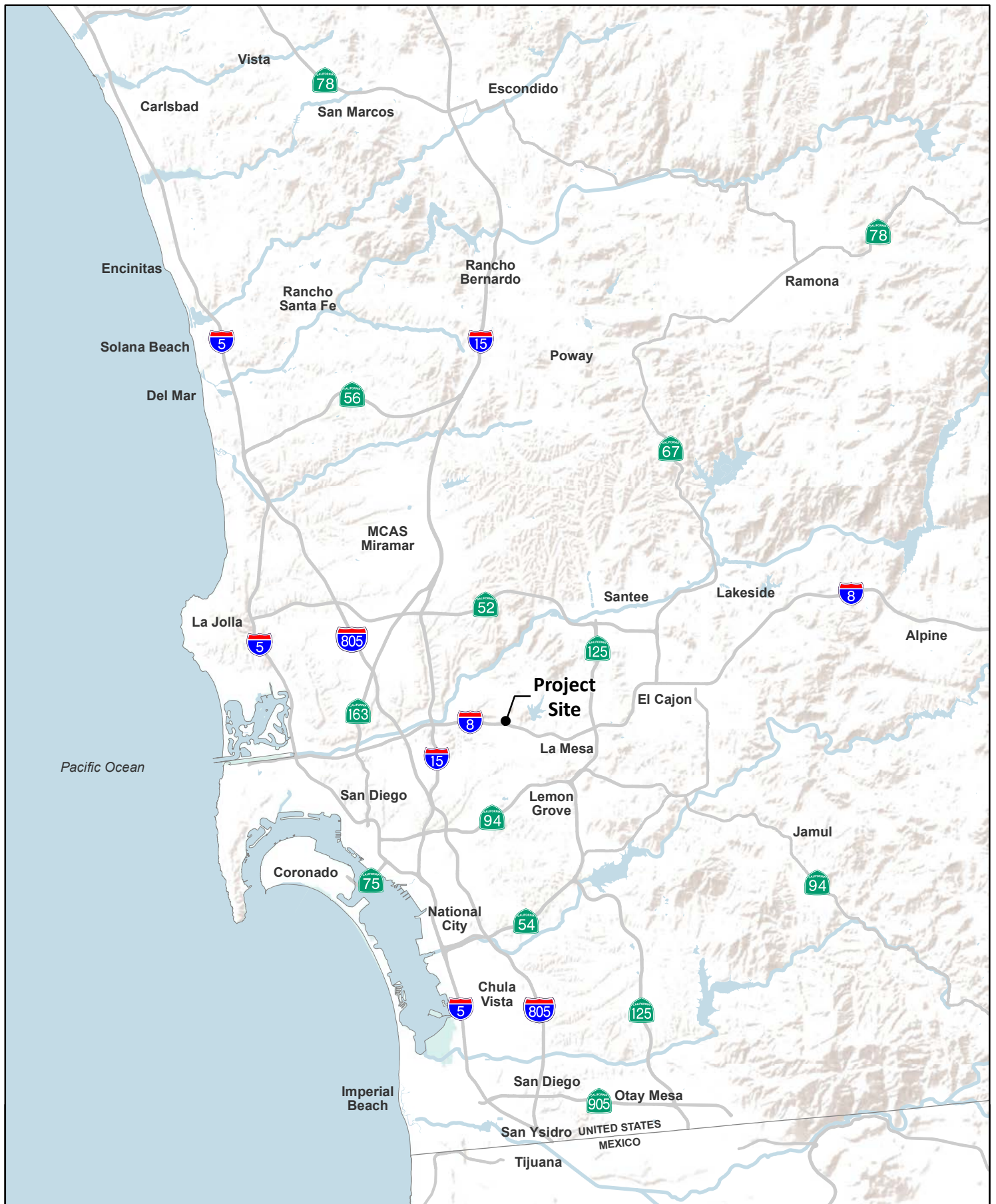
In August 2022, the City Council approved an update to the CAP to expand its approach and strategies for achieving the goal of net zero emissions by 2035 (City of San Diego 2022). As such, the 2022 CAP establishes a new goal, targets and actions that go beyond the 2015 CAP goal. The five strategies include: decarbonization of the built environment; access to clean and renewable energy; mobility and land use; circular economy and clean communities; resilient infrastructure and healthy ecosystems; and emerging climate actions. An implementation plan for the 2022 CAP is being developed by the City's Sustainability and Mobility Department to provide guidance on how to implement the new CAP strategies and measures; the implementation plan will be finalized within six to nine months of CAP adoption.

2.4.3.3 Navajo Community Plan

The project site is governed by the Navajo Community Plan (Community Plan), which was adopted by the San Diego City Council in 1982. Several amendments have occurred since its adoption, with the most recent amendment occurring in 2015. Per the Community Plan, the project site is designated for Single Family residential use as shown in Figure 4, the Community Plan's land use map. The Community Plan identifies community-serving and public uses in Figure 4 and identifies community facilities such as schools, churches, fire stations, libraries, and hospitals separately by patterns and individual symbols within Figures 23 and 24.

2.4.3.4 Land Development Code

The project site is within the RS-1-7 Zone (refer to Figure 2-3), which is intended to accommodate single-family residential uses. The RS-1-7 Zone permits a minimum lot area of 5,000 square feet (SF) and a maximum residential density of one dwelling unit (DU) for each 5,000 SF lot. Other applicable regulations contained in the City's Land Development Code (LDC) include ESL regulations (Section 113.0103), Planned Development Permit (PDP) regulations (Section 143.0401) and Site Development Permit (SDP) regulations (Section 126.0501), as described in Section 5.1, *Land Use*, of this EIR.



Sources: Esri, USGS, NOAA



Figure 2-1

Regional Location

ALL PEOPLES CHURCH



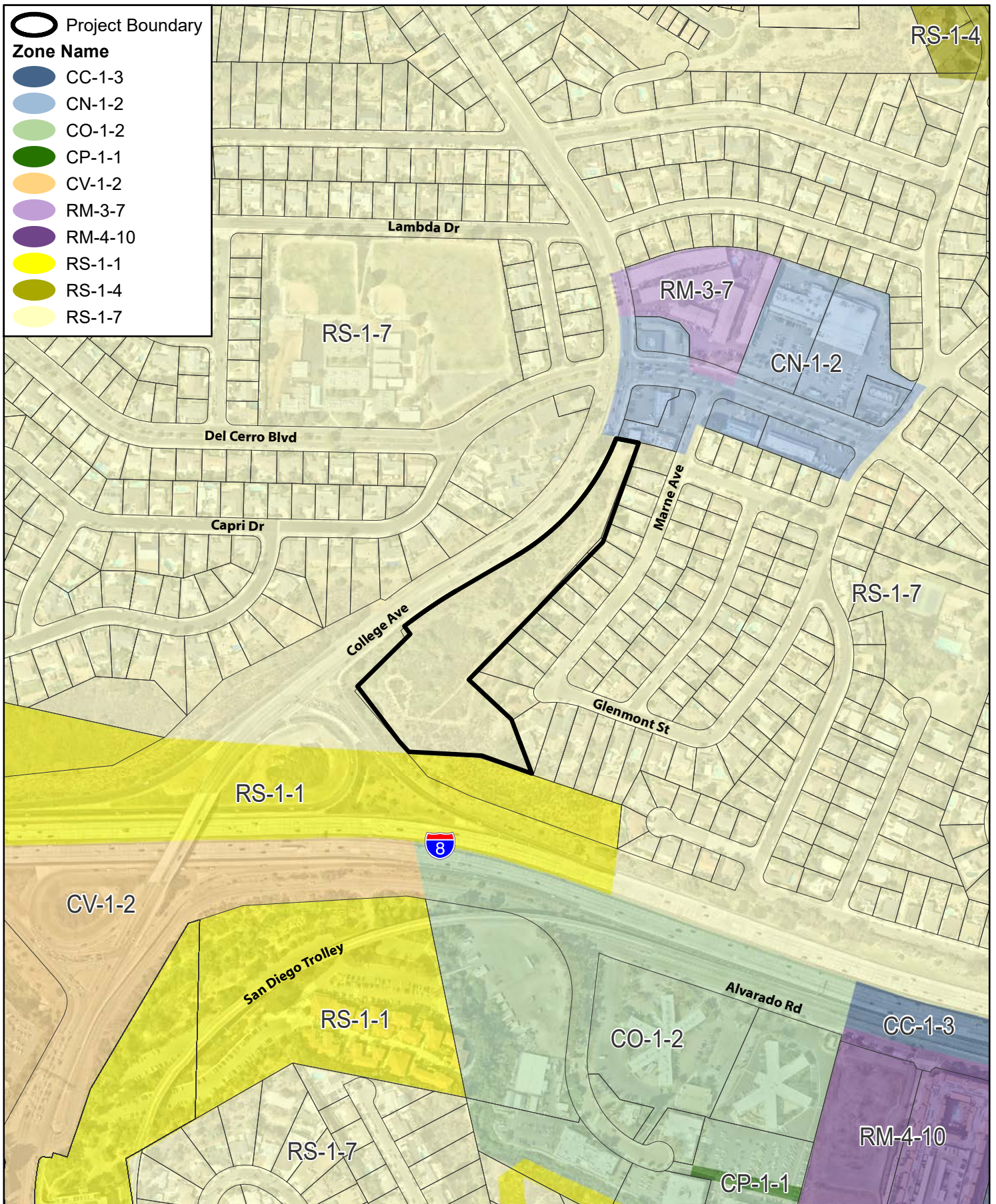
Aerial Photo: USDA NAIP 2020



Figure 2-2

Project Location and Vicinity

ALL PEOPLES CHURCH



Source: SanGIS; Aerial Photo: Nearmap 2021



Figure 2-3
Existing Zoning

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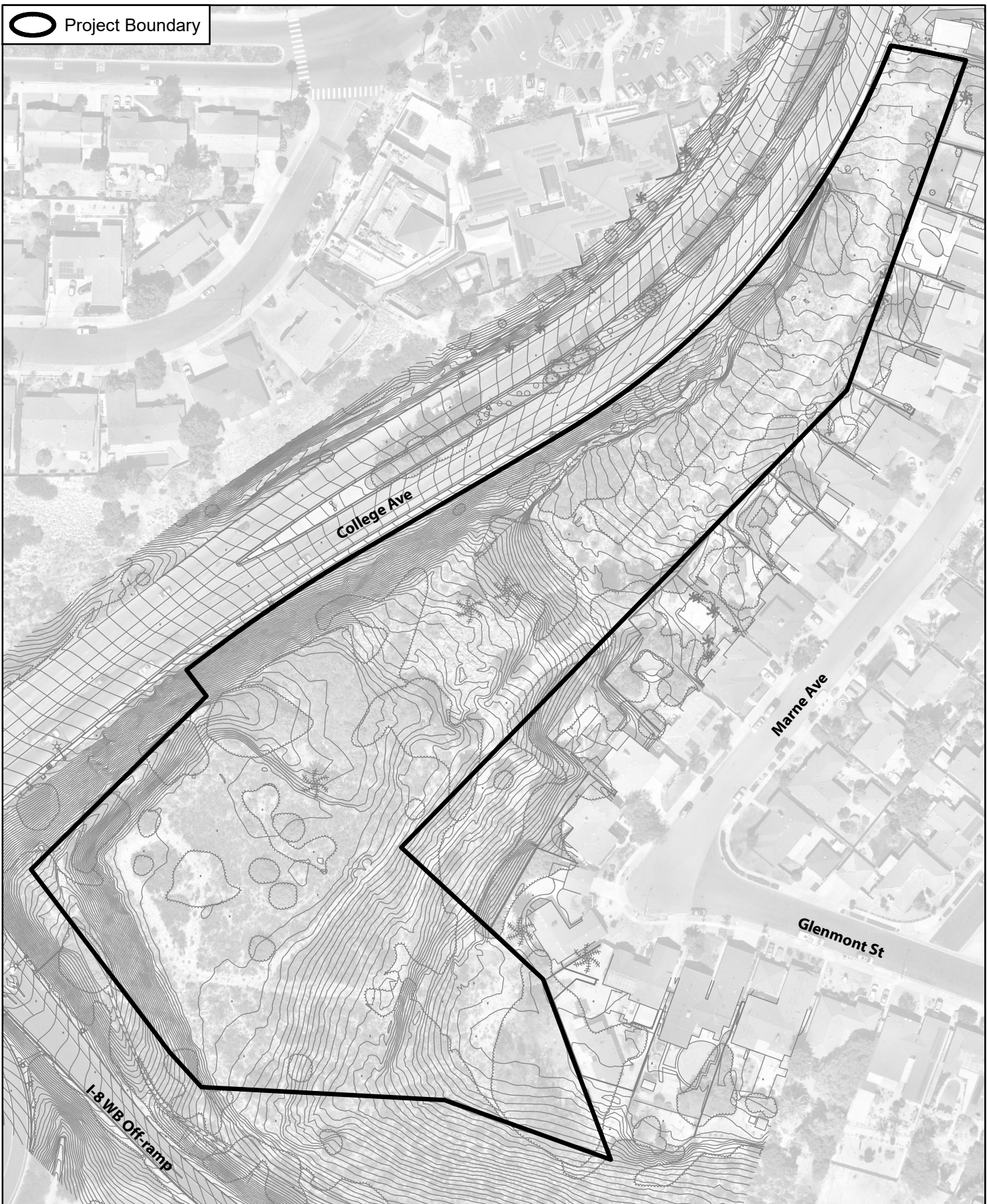
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Figure 2-5

Site Photograph

ALL PEOPLES CHURCH



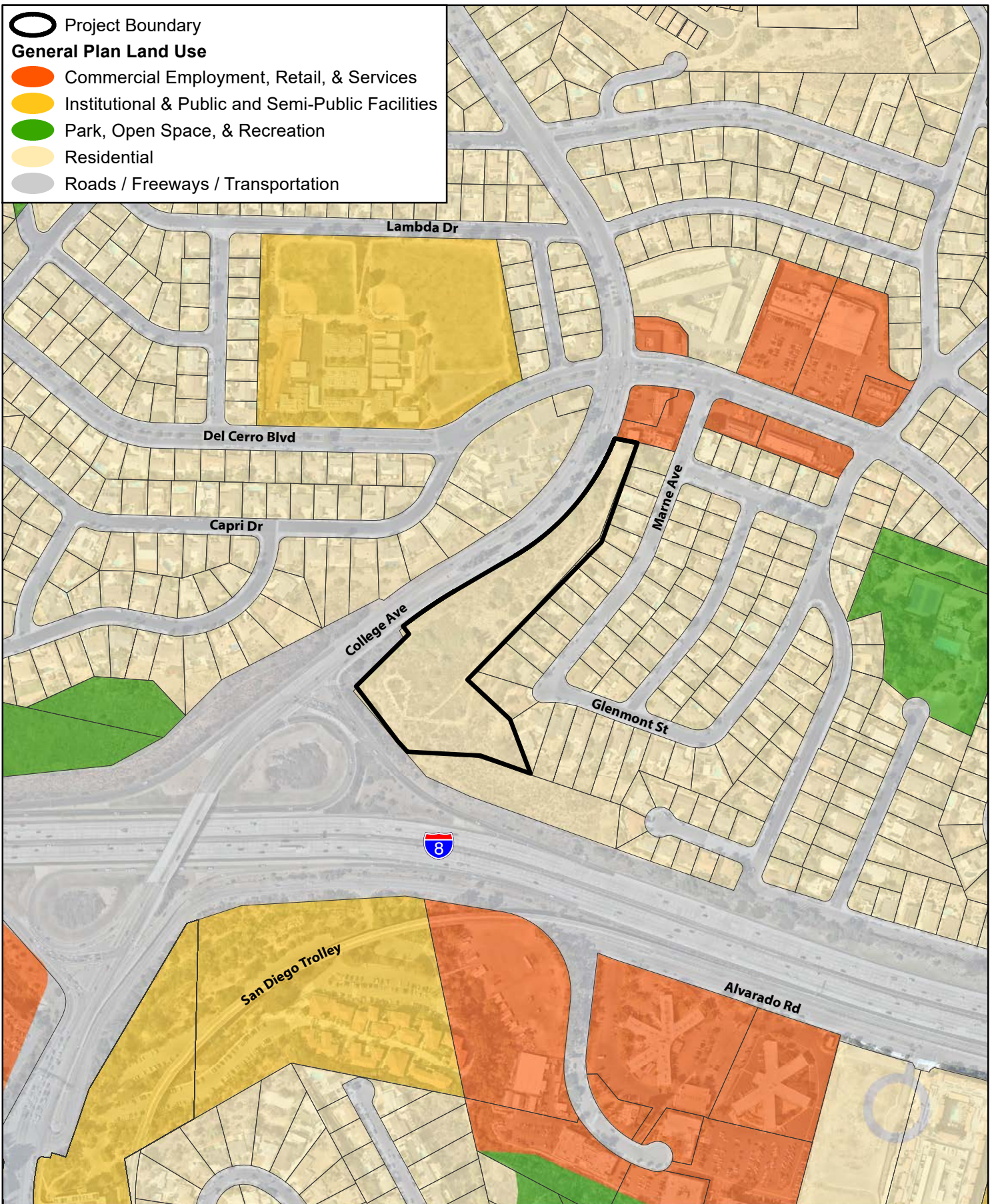
Source: Pasco Laret Suiter & Associates 2021

Figure 2-6

Existing Site Topography

ALL PEOPLES CHURCH

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Source: SanGIS; Aerial Photo: Nearmap 2021



Figure 2-8
General Plan Land Use

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3. PROJECT DESCRIPTION

This section of the Environmental Impact Report (EIR) describes the goals and objectives of the project, its specific characteristics and components, project construction, and the discretionary actions required in conjunction with project approval by the City of San Diego (City) and other agencies.

3.1 Project Objectives

The California Environmental Quality Act (CEQA) Guidelines require that the project description include a statement of the objectives sought by the project applicant. A clearly defined written statement of the objectives helps the lead agency develop a reasonable range of alternatives to evaluate in the EIR and aids decision makers in preparing findings and overriding considerations, as necessary. The statement of objectives also needs to include the underlying purpose of the project [CEQA Guidelines Section 15124(b)].

3.1.1 Project Objectives

The objectives associated with the project are as follows:

1. Place the church/sanctuary in a central San Diego location that is both visible from and convenient to a regional freeway to facilitate church attendance.
2. Relocate to a church-owned property that has proximity to its existing congregation, including its members in City Heights, Mid-Cities, College Area, and Del Cerro.
3. Establish a place of worship that would accommodate the space needs of its staff and congregation.
4. Design the structures and site improvements to be sensitive to the existing topography and surrounding neighborhoods.
5. Address the parking needs on Sundays by constructing sufficient parking to accommodate the maximum projected parking demand.
6. Develop the church/sanctuary near where transit connections are readily available to its congregation.
7. Enhance the religious, spiritual and community-building activities, including Sunday School and adult education, through the design and character of the indoor and outdoor spaces.
8. Fulfill the institution's religious mission to be a multi-ethnic, multi-generational local church with a global vision.

3.2 Project Characteristics

3.2.1 Site Plan

The project consists of the construction and operation of a 54,476-square-foot (SF) church/sanctuary building and a 71,010 SF, two-level parking garage and surface parking areas on an approximately 6-acre vacant site. The proposed project would include a 900-seat sanctuary space with accessory uses (i.e., Sunday school classrooms, offices, and a multi-purpose room/gym), and various site improvements, such as circulation, landscaping, and utility connections which are described below. Of the 900 seats, 587 seats would be fixed in place and 3,690 SF would accommodate the remaining non-fixed seats. Congregation gatherings would primarily occur on Sundays; small group activities may occur during the weekdays or on Saturdays. No primary educational school spaces are proposed as part of the project.

The site plan illustrating the layout of the project is included as **Figure 3-1, Site Plan**. As shown in the site plan, the church/sanctuary building would be situated in the southern portion of the property with the parking garage and main surface parking lot located at grade northerly of the building. An entry plaza would be constructed between the church/sanctuary building and the parking structure. In addition to arrival and departure activities, outdoor activities in the entry plaza would be shielded from nearby residential properties by the church/sanctuary building and the parking structure. Access to the site would be via two private driveway entrances including a new signalized three-way intersection and a new secondary private gated driveway at the northern edge of the project site for right-in/right out movements along College Avenue (refer to Section 3.2.5 for a detailed description of the vehicular, bicycle, and pedestrian circulation for the project).

To implement the project, several deviations from the RS-1-7 zone related to building height, retaining wall height, side yard setback, and bicycle parking are proposed as shown in **Table 3-1, Proposed Development Deviations**. A description of the deviations is provided in this section.

Table 3-1
PROPOSED DEVELOPMENT DEVIATIONS

Development Regulations	Required	Proposed
Maximum Building Height Limits [San Diego Municipal Code (SDMC) §131.0431(b)]	30 feet above grade	53 feet above grade (limited to architectural projections only)
Maximum Wall Height Limits [SDMC §142.0340(d)(1)]	6 feet above grade	20 feet above grade
Minimum Building Side Yard Setbacks [SDMC §131.0431(b)]	84 feet, 2 inches	14 feet
Long-Term Bicycle Parking	16 spaces	3 spaces

3.2.2 Architectural Design

The church/sanctuary building is designed in a contemporary Spanish Colonial Revival-style theme featuring arched entrances and windows along its painted concrete tilt-up facades, with accents of wood fascia and terra-cotta-colored tile roofing materials. The glazing for each window would be tinted bronze in color. Exterior building elevations and building articulations are shown on **Figure 3-2, Exterior Elevations (East and North)**, and **Figure 3-3, Exterior Elevations (West and South)**. The building would feature two levels with front and rear vestibules located on the first floor.

With regard to the architectural design, the majority of the church/sanctuary building and its parapet wall around the flat roof areas would comply with the 30-foot height limit established in the SDMC. To create visual interest, three pitched roof towers would extend from 45 to 48 feet above grade and the cross would extend an additional 8 feet above the 45-foot roof tower on the western elevation to 53 feet above grade. These features are illustrated in the elevations in Figures 3-2 and 3-3 and would require approval of building height deviations as noted in Table 3-1. As shown in the cross-sections, the building rooflines and cross would remain below grade of the adjacent residential lots along Marne Avenue and the west end of Glenmont Street. The setback deviations are proposed due to the elongated, irregular shape of the lot relative to its frontage with College Avenue. Project cross sections are provided in **Figure 3-4, Site Sections**.

The two-level parking structure would be recessed into the terrain such that the top deck would be below grade of College Avenue. The lower and upper parking levels of the structure would be connected through an internal vehicle ramp. The primary surface parking lot would be constructed north of the parking structure at grade with College Avenue and connected to the upper level of the parking structure via internal roads. Smaller surface parking areas would be provided south and east of the parking structure and church/sanctuary building as shown on the project site plan. The parking structure would contain 203 parking spaces, while surface parking areas would hold 153 spaces, for a total of 356 parking spaces. Parking would be provided for standard vehicles, accessible vehicles, clean air vehicles, carpool vehicles, electric vehicles, motorcycles, and bicycles. The number of parking spaces for vehicles would exceed the City's minimum parking requirements of 319 parking spaces by 37 parking spaces. Refuse/recycling areas would be provided in the surface parking area east of the church/sanctuary building.

The design of the parking structure would complement the architectural style of the church/sanctuary building by featuring painted concrete walls with arched entries (as shown in **Figure 3-5, Parking Structure Elevations**). The upper deck of the parking structure would feature planters with landscaping that would exceed the requirements in the City's Land Development Code (LDC).

3.2.3 Landscape Concept Plan

The proposed landscape plan (refer to **Figure 3-6, Landscape Plan**) features the use of native/naturalized and/or drought-tolerant plant material, whenever possible. No invasive or potentially invasive species would be used. In general, the landscape improvements along College Avenue would create a 14- to 16-foot-wide parkway featuring a 12-foot-wide shared sidewalk and street side canopy, shade-producing street trees and ground covers from the property line north to the private driveway. North of the private driveway, a 10- to 12-foot-wide parkway would be installed, consisting of street side canopy, shade-producing street trees and a 5-foot-wide sidewalk.

Entry monumentation and landscape treatments would be installed on site at the southeast corner, near the driveway entrance.

Plant material would be used throughout the site to help define spaces, encourage circulation paths, highlight entry points, provide visual relief, and screen retaining walls and off-site properties. On-site landscaping would include canopy shade trees and raised box plantings on the upper deck of the parking structure, shade-producing trees in the parking areas, accent planting zones featuring palms and focal point species, and ground cover, shrubs and trees used for slope plantings. A minimum 5-foot-wide landscape buffer containing spreading ground covers, taller screening shrubs and canopy trees, ranging in height from 25 to 40 feet, would be installed between the proposed surface parking areas and residential properties to the east. The manufactured slope that would wrap around the south-facing slope below the existing neighborhood would feature extensive landscape treatments including spreading ground covers, large shrubs and canopy trees, up to 25 feet in height. The retaining walls along the southern project border would be landscaped with trees and vining species to soften and conceal their visibility. In addition, plant material would be placed within the stormwater biofiltration basins that would be constructed as part of the project (refer to Section 3.2.6) to provide stormwater management by collecting and treating runoff prior to its release off site. A portion of the existing eucalyptus woodland and Diegan coastal sage scrub located in the southeast corner of the site would be retained in place.

3.2.4 Grading Plan

Approximately 93 percent of the project site would be graded to accommodate development of the project. Approximately 16,500 cubic yards (CY) of cut and 39,000 CY of fill (including 22,500 CY of import) would be required to implement the grading plan. The maximum depth of excavation would be 25.5 feet, as measured vertically, and the maximum depth of fill would be 28 feet. To implement the site plan and avoid the need to obtain an encroachment permit for grading into the California Department of Transportation (Caltrans) right-of-way (ROW), retaining walls are proposed along the southern and southwestern limits of grading. The walls would exceed the 6-foot height limit allowed by the LDC and would require approval of a deviation. Landscape screening and vining species would be installed above and below the retaining walls to soften their appearance as shown in Figure 3-6. Grading and improvement plans would be reviewed by the City Engineer prior to site development. **Figure 3-7, Grading Plan**, illustrates the grading concept associated with implementing the project.

3.2.5 Vehicular, Bicycle, and Pedestrian Access

Vehicular access to the project and the parking structure would be via a signalized full-access driveway along College Avenue. Off-site improvements to the new College Avenue intersection would include creating a median break and narrowing of the existing raised median to construct a new southbound left-turn lane, striping of a northbound right-turn lane, and installing a crosswalk. A new traffic signal would be installed at the completed intersection. The private driveway connection at College Avenue would descend to an entry plaza between the parking structure and the church/sanctuary building and the entrances to the proposed parking areas. An on-site loading zone would also be provided near the entry plaza. A private gated driveway at the northern edge of the project site for right-in/right out movements along College Avenue would also be constructed. The project's ingress/egress plans would be required to comply with the City's street design requirements, including standards related to minimum sight distance and emergency access.

New bicycle lane signage and striping would be installed along northbound College Avenue. Along the project's College Avenue frontage, a 12-foot shared (i.e., pedestrians and bicycles) contiguous sidewalk would be installed south of the project driveway and north of the driveway a 5-foot-wide non-contiguous sidewalk would be constructed within the parkway. Canopy trees and other plant material would be installed adjacent to the sidewalks and surface parking area per City requirements. Stairs and an Americans with Disabilities Act (ADA) ramp would be extended on site to link the College Avenue sidewalk to the church/sanctuary building entrance and entry plaza.

Bicycle parking and storage would be provided on the project site consisting of 18 short-term spaces and 3 long-term spaces. A deviation is proposed to reduce the long-term bicycle parking spaces from 16 to 3 to serve the church staff since the congregation are expected to be short-term users when they bike to the project site.

3.2.6 Utilities and Other Site Improvements

Several on-site and off-site utility improvements would be required to implement the project. A 320-linear-foot, 8-inch-diameter public water main extension would be installed along College Avenue to a point of connection at its intersection with Del Cerro Boulevard. On-site improvements would include the installation of 2-inch-diameter public domestic water service connection; an 8-inch-diameter private water line for fire service; a 1-inch-diameter irrigation line; an 8-inch-diameter private gravity sewer line; and a private sewer lift station and private sewer force main. Many of these utility improvements would connect with existing public infrastructure in College Avenue, with the exception of the sewer service which would connect off-site through an adjacent private residential lot via a private 4-inch-diameter sewer lateral to an 8-inch-diameter off-site public sewer main in Marne Avenue (i.e., within a private easement granted to the project). On-site stormwater runoff would be directed to four biofiltration basins and then discharged into existing storm drains and picked up by the existing headwall and public 48-inch storm drain that flows beneath I-8.

3.2.7 Sustainable Design Features

The project would incorporate the following sustainable design features to minimize use of water, energy, and solid waste as outlined in **Appendix B, Climate Action Plan (CAP) Consistency Checklist** (Baranek Consulting Group 2021), to this EIR:

- Cool/green roofs
- Use of low-flow fixtures/appliances and low-flow irrigation
- Electrical vehicle charging stations
- Designated and secure bicycle parking spaces
- Designated parking spaces low-emitting, fuel-efficient, and carpool/vanpool vehicles
- Implementation of a solid waste recycling plan

The project landscape plan also proposes to install a net increase of 92 trees to facilitate the City's CAP goals for greenhouse gas emissions reduction and the enhancement of carbon sequestration opportunities.

3.3 Project Construction

3.3.1 Site Preparation and Demolition

Site preparation would require the removal of the existing vegetation and excess soil material, and partial demolition of the raised median and pavement within College Avenue. Typical construction equipment/vehicles required for project construction would include bulldozers, front-end loaders, scrapers, tractors, backhoes, paver/rollers, dump trucks, water trucks, and concrete mixers. Construction staging would occur within the approved project disturbance footprint and would be located as far away as possible from existing residences. The project would be constructed in a single phase, and construction is estimated to begin in late 2022 and be completed in early 2024. Demolition and construction would occur over an approximately 12- to 14-month period. It is anticipated that construction activities would occur from 7 a.m. to 7 p.m. Monday through Saturday, excluding public holidays, in accordance with SDMC Section 59.5.0404.

3.4 Discretionary Actions

3.4.1 Community Plan Amendment

A Community Plan Amendment (CPA) is proposed to allow for the development of a religious assembly use within the Single Family residential land use designation. The CPA would place a new church symbol on the Other Community Uses map, Figure 24, of the Navajo Community Plan (**Figure 3-8, Community Plan Amendment**). The CPA was initiated by the City Planning Commission at their July 19, 2018, meeting.

The CPA also constitutes an amendment to the General Plan. The City's General Plan and Community Plan Amendment Manual states that, "An amendment to the figures or text of a community, specific or precise plan is always an amendment to the General Plan since those plans are components of the Land Use Element of the General Plan." While an amendment is proposed to the Navajo Community Plan, the proposed CPA can be incorporated into the document at the community plan level and scale without need for revisions to the text, maps or other graphics of the General Plan. Therefore, revisions to the General Plan document are not required to implement the project.

3.4.2 Planned Development Permit

A Planned Development Permit (PDP) is required to allow a use that is permitted by the land use plan but not allowed by the underlying zone. In addition, the PDP also permits deviations from the RS-1-7 zone, as described in Table 3-1.

3.4.3 Site Development Permit

A Site Development Permit (SDP) is required for the project to impact sensitive biological resources.

3.4.4 Tentative Map

A Tentative Map (TM) is proposed to facilitate the vacation and granting of easements.

3.4.5 Easement Vacations

Numerous existing easements would be vacated by the TM. Specifically, existing sewer, telecom, and stormwater easements that cross the property would be abandoned. In addition, a portion of the access rights would be revested for the proposed signalized intersection and ingress/egress driveways along College Avenue and ROW would be dedicated to the City to accommodate the proposed parkway along the project frontage with College Avenue.

3.4.6 Other Agency Approvals

No other agency approvals are required to implement the project.

3.5 Intended Uses of the EIR

Pursuant to CEQA Guidelines Section 15124(d), *Project Description*, the description of a project shall contain a statement briefly describing the intended uses of the EIR. The City would use the information in this EIR and supporting documentation in its decision to approve the proposed project.

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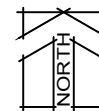
— RETAINING WALL

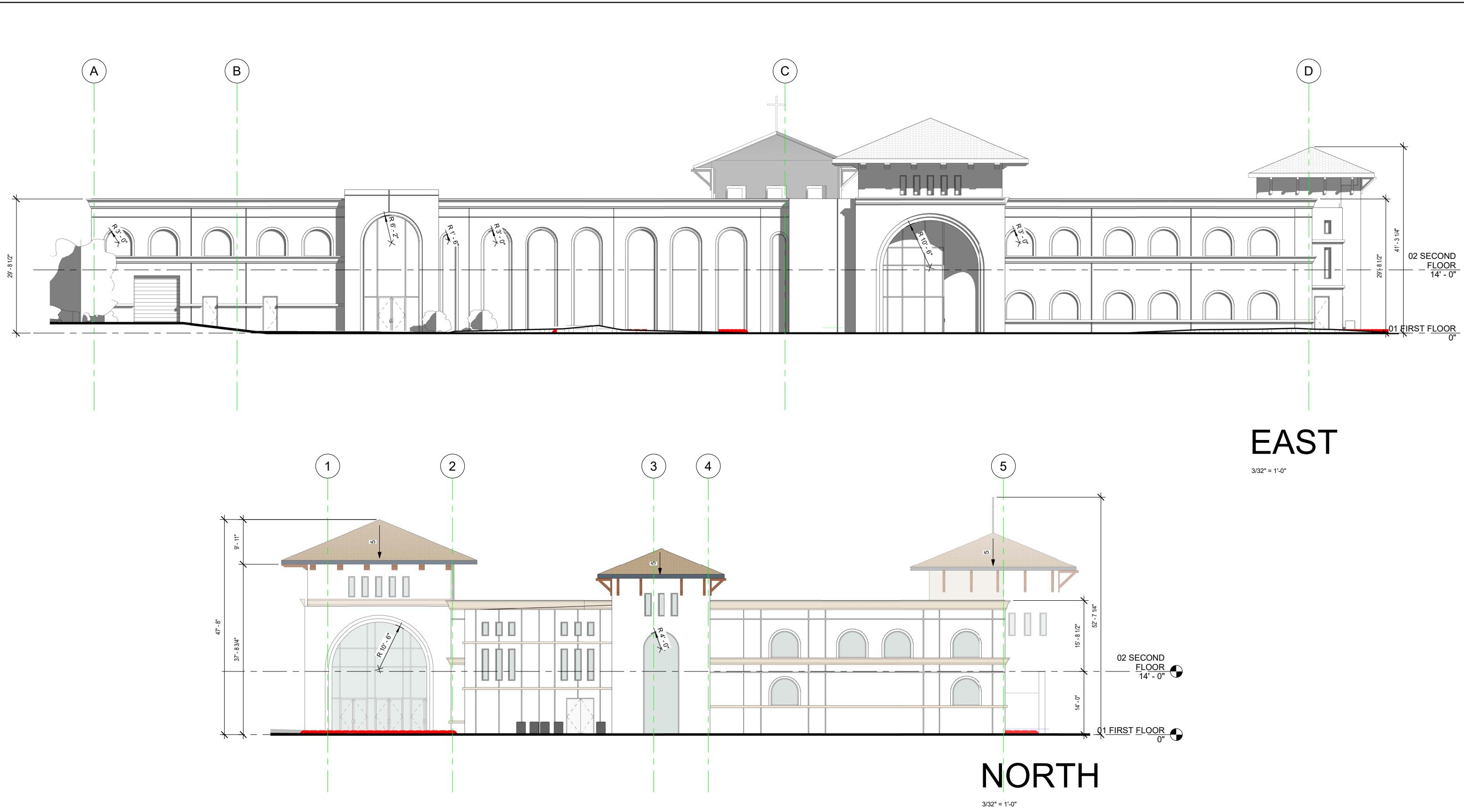
SQUARE FOOTAGE GARAGE	
Name	Area

FIRST LEVEL	35,465 SF
01 PARKING	35,465 SF
FIRST FLOOR	
SECOND LEVEL	35,545 SF
02 PARKING	35,545 SF
SECOND FLOOR	
Grand total	71,010 SF

SQUARE FOOTAGE CHURCH	
Name	Area

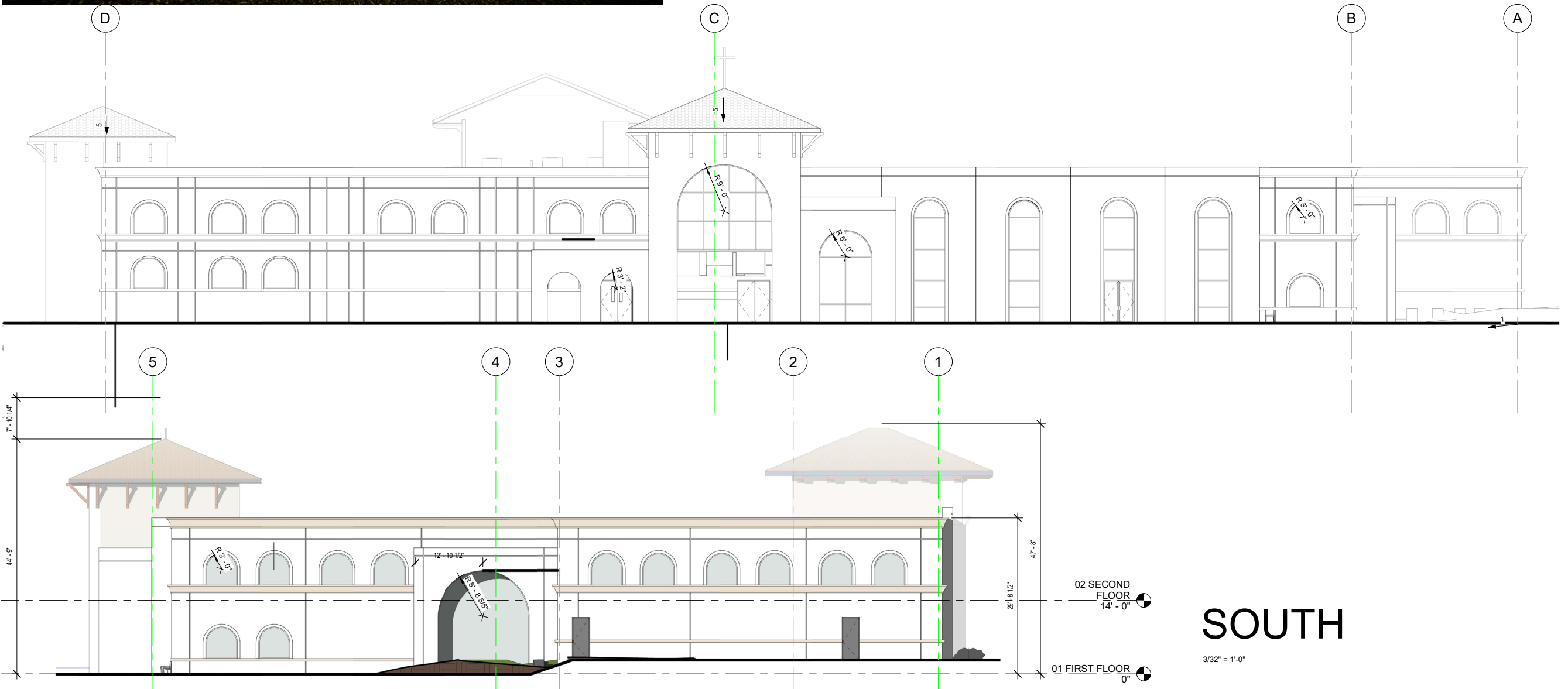
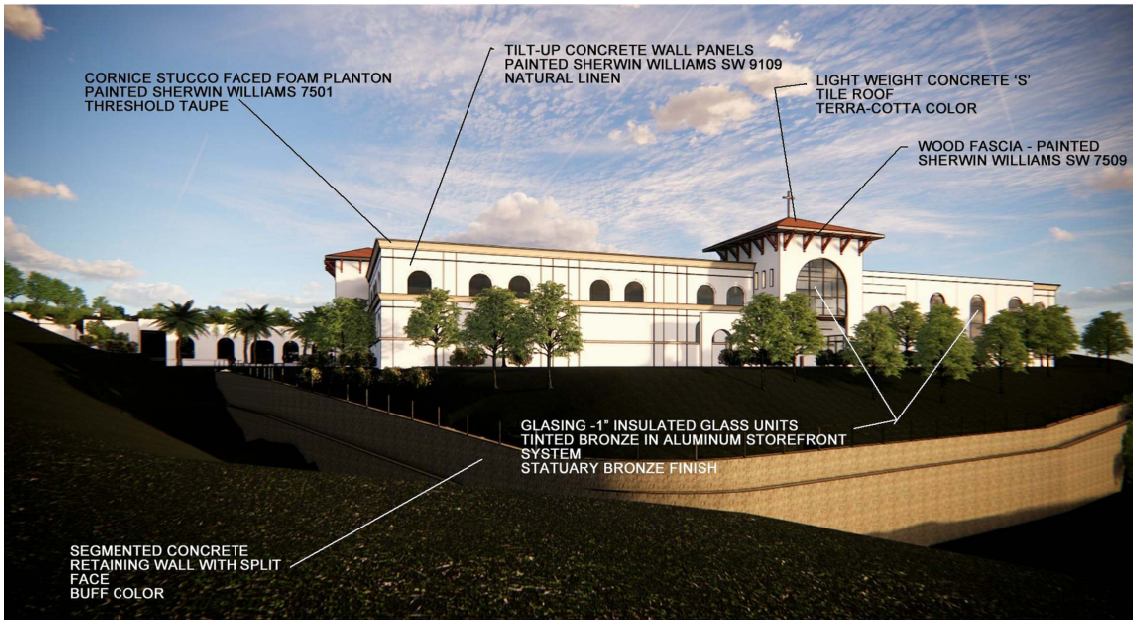
FIRST FLOOR	36,869 SF
VESTIBULE	526 SF
REAR VESTIBULE	484 SF
01 FIRST FLOOR	37,878 SF
SECOND FLOOR	16,598 SF
02 SECOND FLOOR	16,598 SF
Grand total	54,476 SF





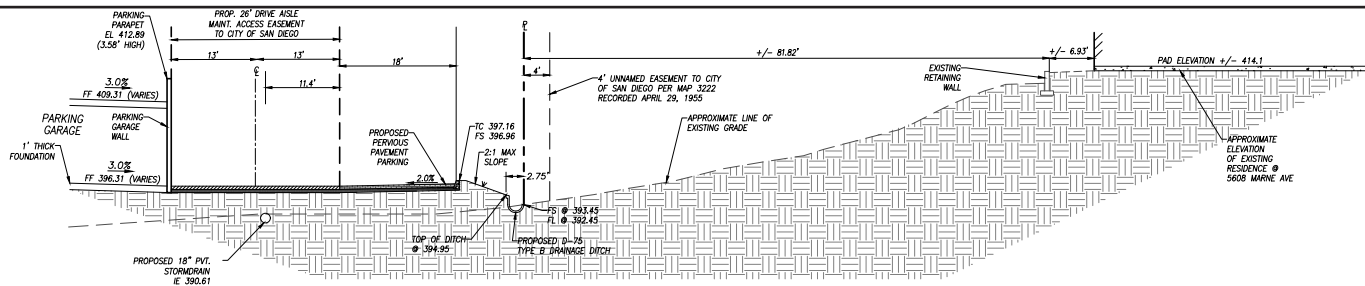
Source: Kenneth D. Smith Architect & Associates 2021

Figure 3-2
Exterior Elevations (East and North)
ALL PEOPLES CHURCH

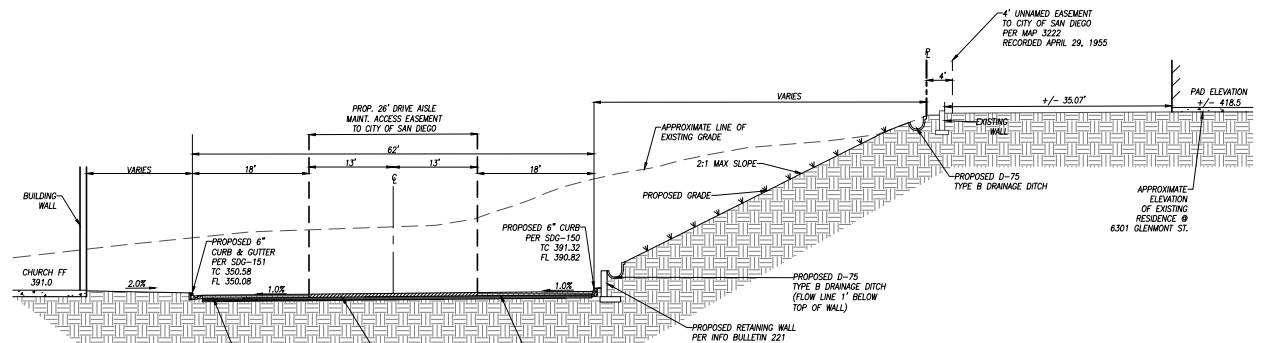


Source: Kenneth D. Smith Architect & Associates 2021

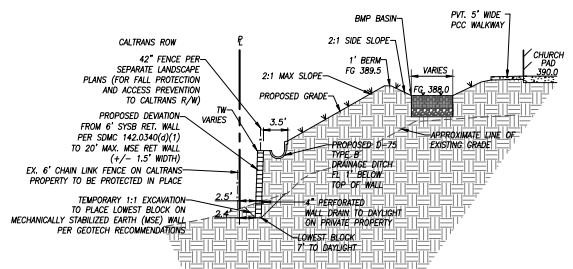
Figure 3-3
Exterior Elevations (West and South)
ALL PEOPLES CHURCH



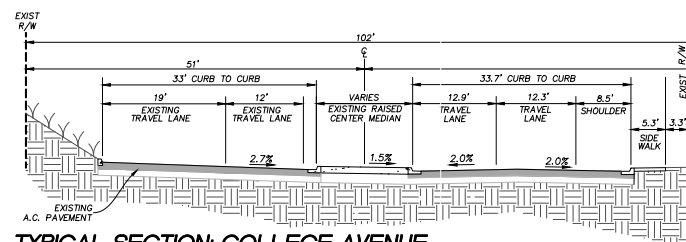
SECTION A-A: THROUGH TO 5608 MARNE AVE
NOT TO SCALE



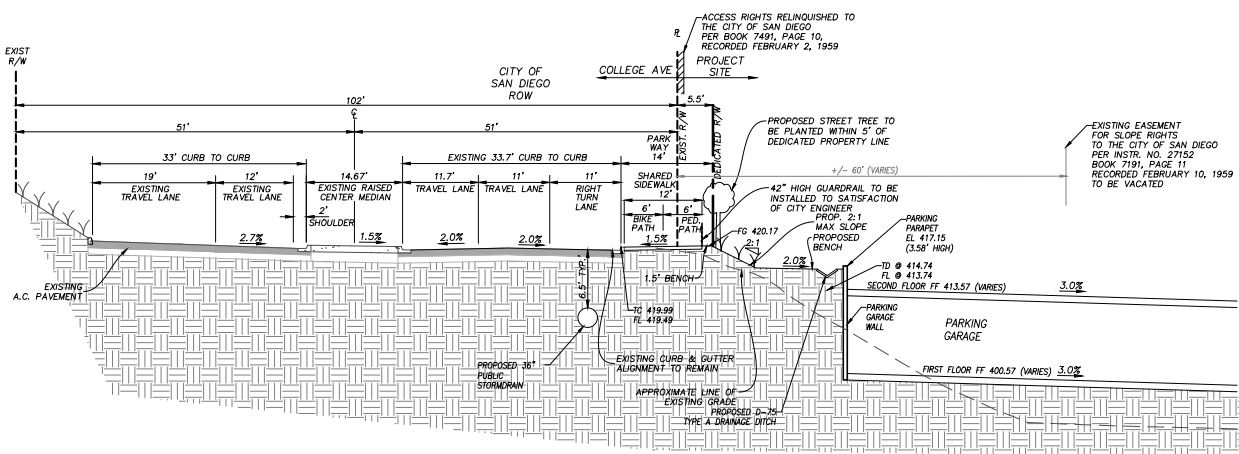
SECTION B-B: THROUGH TO 6301 GLENMONT STREET
NOT TO SCALE



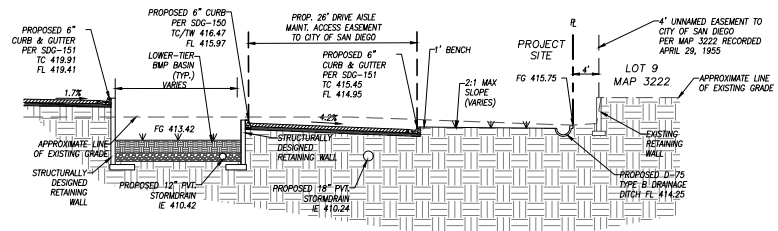
SECTION C-C: SOUTHWEST-CALTRANS ROW
NOT TO SCALE



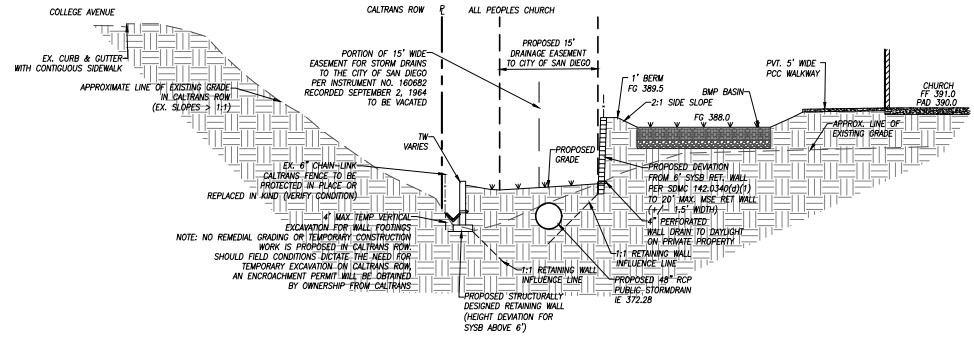
TYPICAL SECTION: COLLEGE AVENUE
NOT TO SCALE



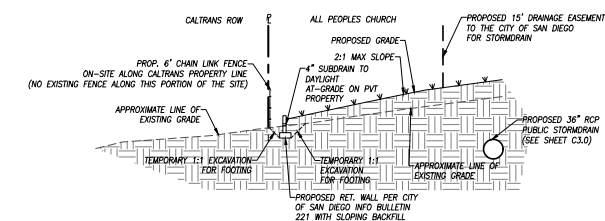
SECTION D-D: WEST FROM COLLEGE AVENUE
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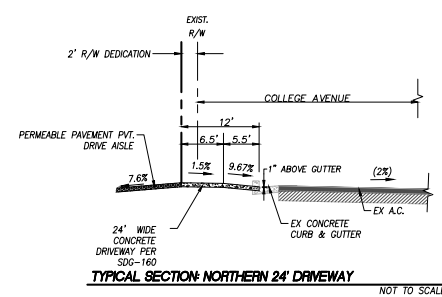
SECTION E-E: EASTERLY BOUNDARY BASIN
NOT TO SCALE



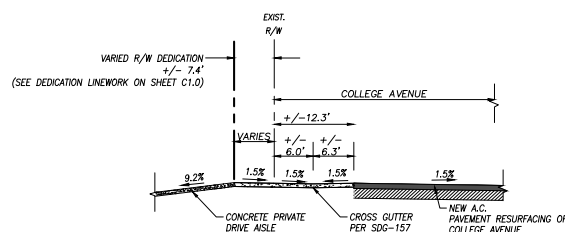
SECTION F-F: CALTRANS ROW THROUGH CHURCH
NOT TO SCALE



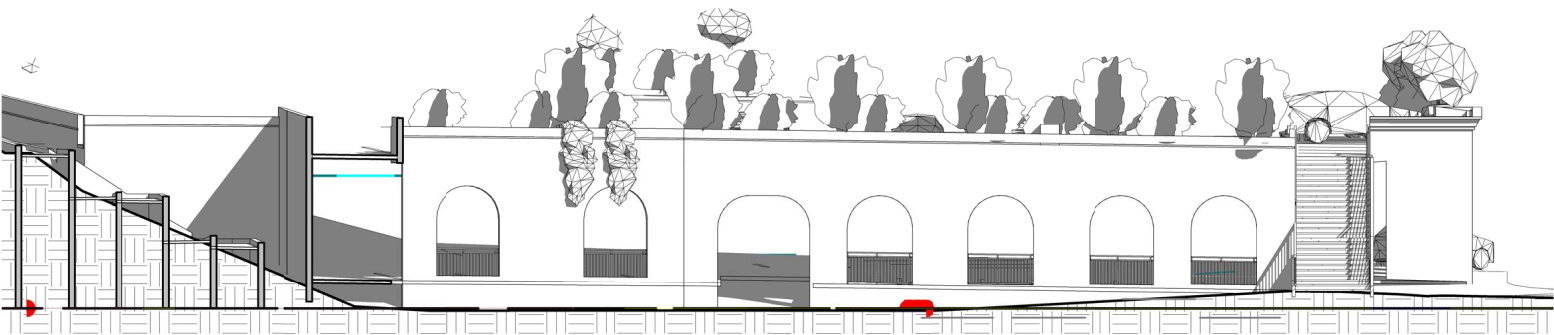
SECTION G-G: CALTRANS ROW
NOT TO SCALE



TYPICAL SECTION: NORTHERN 24' DRIVEWAY
NOT TO SCALE

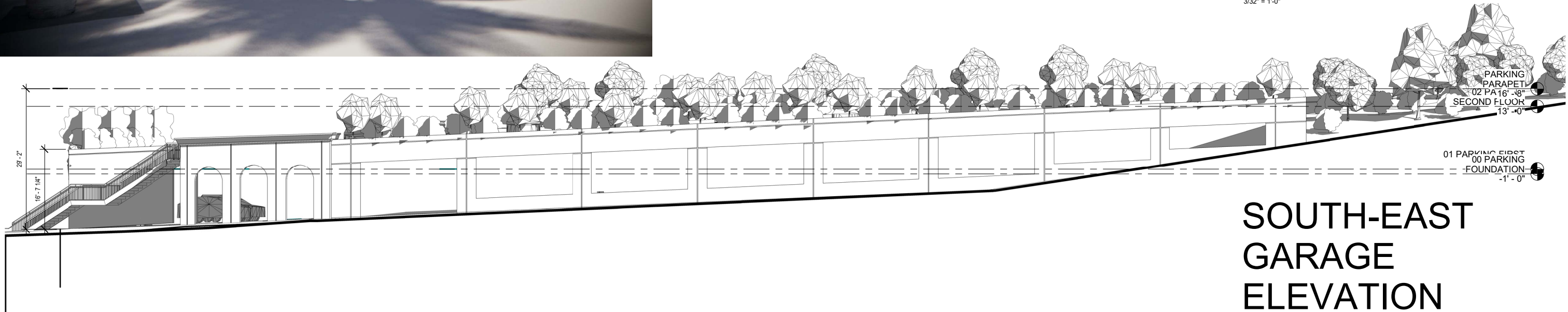


TYPICAL SECTION: 30' SIGNALIZED INTERSECTION
NOT TO SCALE



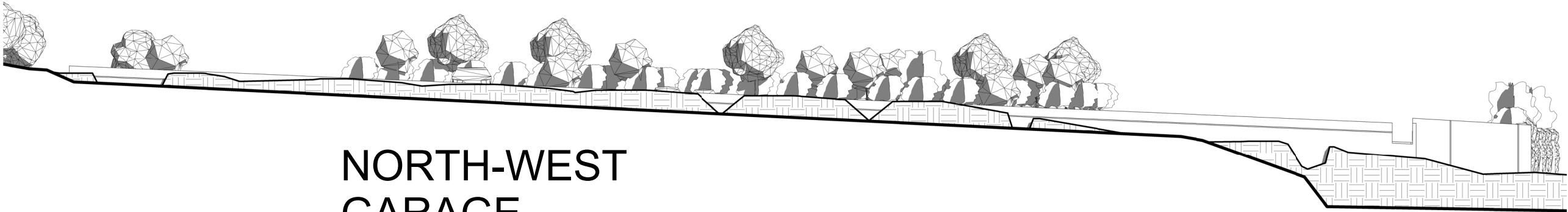
SOUTH-WEST GARAGE ELEVATION

3/32" = 1'-0"



SOUTH-EAST GARAGE ELEVATION

3/32" = 1'-0"



NORTH-WEST GARAGE ELEVATION

3/32" = 1'-0"

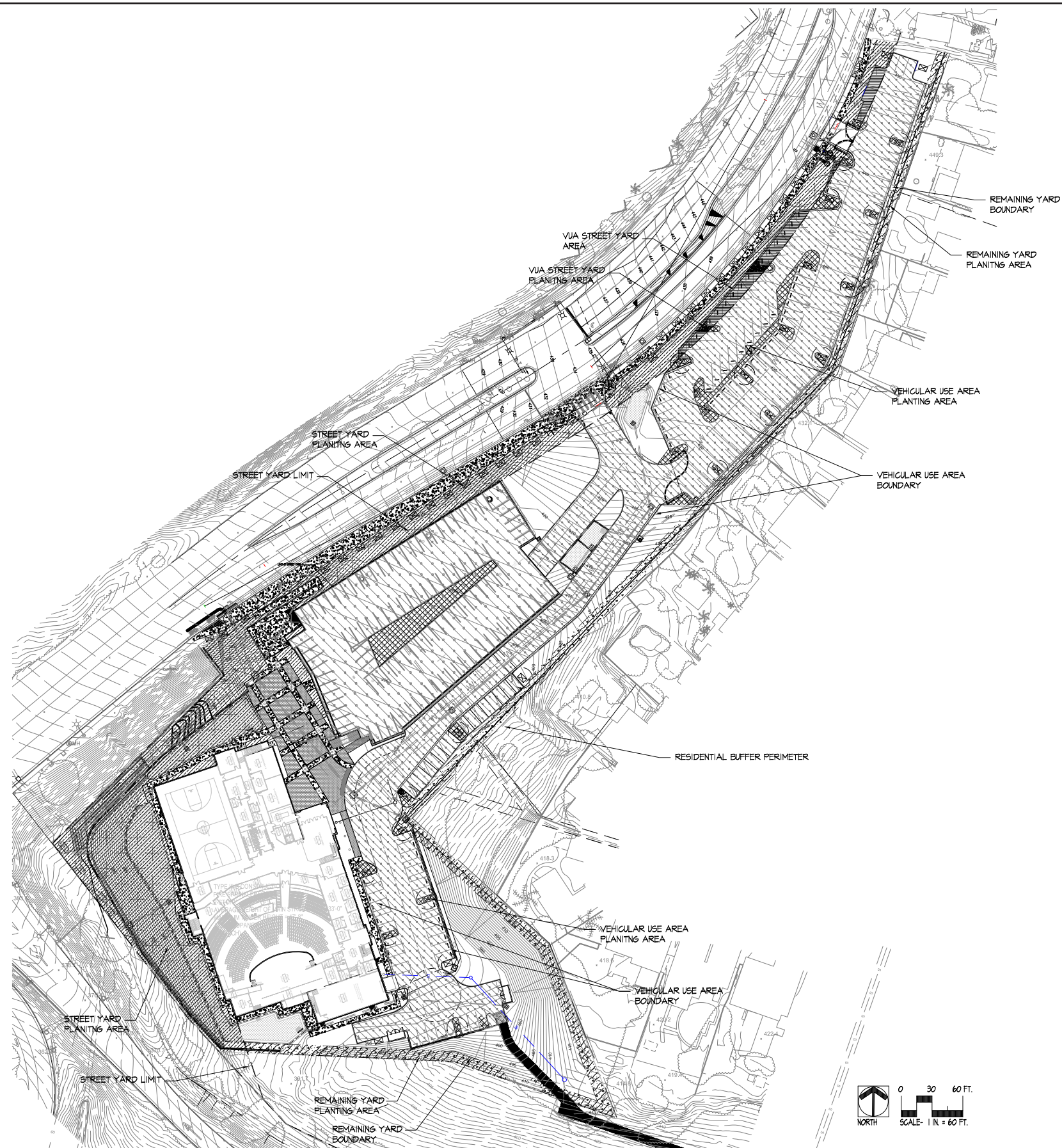
Source: Kenneth D. Smith Architect & Associates 2021

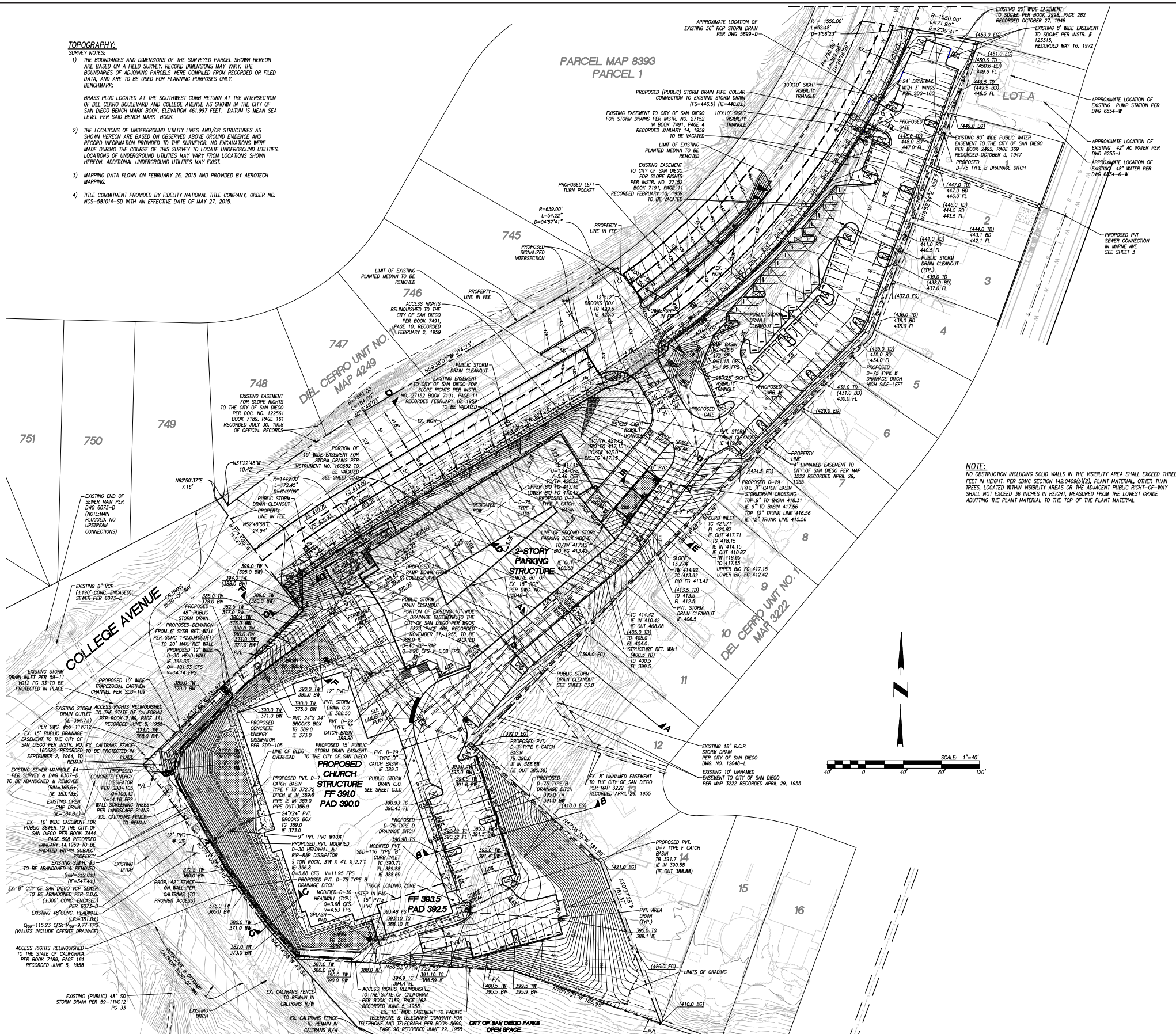
5 X 8 FT.
ROOT
ZONE

COMMERICAL / RESIDENTIAL ADJACENT BUFFER

QUANTITY		
5 FT BUFFER AREA		6455
TREE SCREENING POINT REQUIRED @ .05		323
PROVIDED LANDSCAPE POINTS (TREES ONLY)		360

ROOT ZONE NOTE:
AT THE UPPER PARKING LEVEL OF PARKING STRUCTURE-
THE MINIMUM DIMENSION AND ROOT ZONE AREA MAY BE
REDUCED WITH THE USE OF STRUCTURAL SOIL OR WHERE
THE COMBINATION OF SOIL CONDITIONS, ROOT ZONE
AREA, ADJACENT IMPROVEMENTS, AND SELECTED TREE
SPECIES CAN BE DEMONSTRATED TO PROVIDE
CONDITIONS FOR HEALTHY TREE GROWTH THAT WILL NOT
DAMAGE ADJACENT IMPROVEMENTS.





- TOPOGRAPHY:**
SURVEY NOTES:
- 1) THE BOUNDARIES AND DIMENSIONS OF THE SURVEYED PARCEL SHOWN HEREON ARE BASED ON A FIELD SURVEY. RECORD DIMENSIONS MAY VARY. THE BOUNDARIES OF ADJOINING PARCELS WERE COMPILED FROM RECORDED OR FILED DATA, AND ARE TO BE USED FOR PLANNING PURPOSES ONLY. BENCHMARK: BRASS PLUG LOCATED AT THE SOUTHWEST CURB RETURN AT THE INTERSECTION OF DEL CERRO BOULEVARD AND COLLEGE AVENUE AS SHOWN IN THE CITY OF SAN DIEGO BENCH MARK BOOK. ELEVATION 461.997 FEET. DATUM IS MEAN SEA LEVEL PER SAID BENCH MARK BOOK.
 - 2) THE LOCATIONS OF UNDERGROUND UTILITY LINES AND/OR STRUCTURES AS SHOWN HEREON ARE BASED ON OBSERVED ABOVE GROUND EVIDENCE AND RECORD INFORMATION PROVIDED TO THE SURVEYOR. NO EXCAVATIONS WERE MADE DURING THE COURSE OF THIS SURVEY TO LOCATE UNDERGROUND UTILITIES. LOCATIONS OF UNDERGROUND UTILITIES MAY VARY FROM LOCATIONS SHOWN HEREON. ADDITIONAL UNDERGROUND UTILITIES MAY EXIST.
 - 3) MAPPING DATA FLOWN ON FEBRUARY 26, 2015 AND PROVIDED BY AEROTECH MAPPING.
 - 4) TITLE COMMITMENT PROVIDED BY FIDELITY NATIONAL TITLE COMPANY, ORDER NO. NCS-581014-SD WITH AN EFFECTIVE DATE OF MAY 27, 2015.

- LEGEND**
- BOUNDARY LINE
 - ADJACENT PROPERTY LINE
 - EASEMENT LINE
 - RIGHT OF WAY
 - EXISTING STREET CENTERLINE
 - EXISTING IMPROVEMENTS
 - EXISTING CONTOUR
 - EXISTING CURB & GUTTER
 - EXISTING SEWER MAIN
 - EXISTING STORM DRAIN MAIN
 - EXISTING CURB INLET
 - EXISTING WATER MAIN
 - EXISTING WATER VALVE
 - EXISTING FIRE HYDRANT
 - EXISTING STREET LIGHT
 - EXISTING STRUCTURE
 - EXISTING VEGETATION
 - PROPOSED IMPROVEMENTS
 - PROPOSED ROAD CENTERLINE
 - LIMIT OF WORK LINE
 - CURB AND GUTTER
 - 24" RESIDENTIAL DRIVEWAY
 - PROPOSED CONTOURS
 - PROPOSED SPOT ELEVATION
 - RETAINING WALL
 - SORSO D-75 BROW DITCH
 - BIORETENTION BASIN
 - STORM DRAIN HEADWALL
 - STORM DRAIN CLEANOUP
 - AREA DRAIN
 - STORM DRAIN INLET
 - TYPE F CATCH BASIN
 - RIP RAP ENERGY DISSIPATOR PER SDD-104
 - PVC STORM DRAIN (SIZE VARIES)
 - WATER SERVICE
 - TRAFFIC SIGNAL
 - PARKING GARAGE WALL
 - CUT/FILL SLOPE
 - PERMEABLE PAVERS
 - PROPOSED RIP-RAP
 - TREE PER LANDSCAPE PLANS

NOTE:
NO OBSTRUCTION INCLUDING SOLID WALLS IN THE VISIBILITY AREA SHALL EXCEED THREE FEET IN HEIGHT. PER SDMC SECTION 142.0409(b)(2), PLANT MATERIAL, OTHER THAN TREES, LOCATED WITHIN VISIBILITY AREAS OF THE ADJACENT PUBLIC RIGHT-OF-WAY SHALL NOT EXCEED 36 INCHES IN HEIGHT, MEASURED FROM THE LOWEST GRADE ABUTTING THE PLANT MATERIAL TO THE TOP OF THE PLANT MATERIAL.



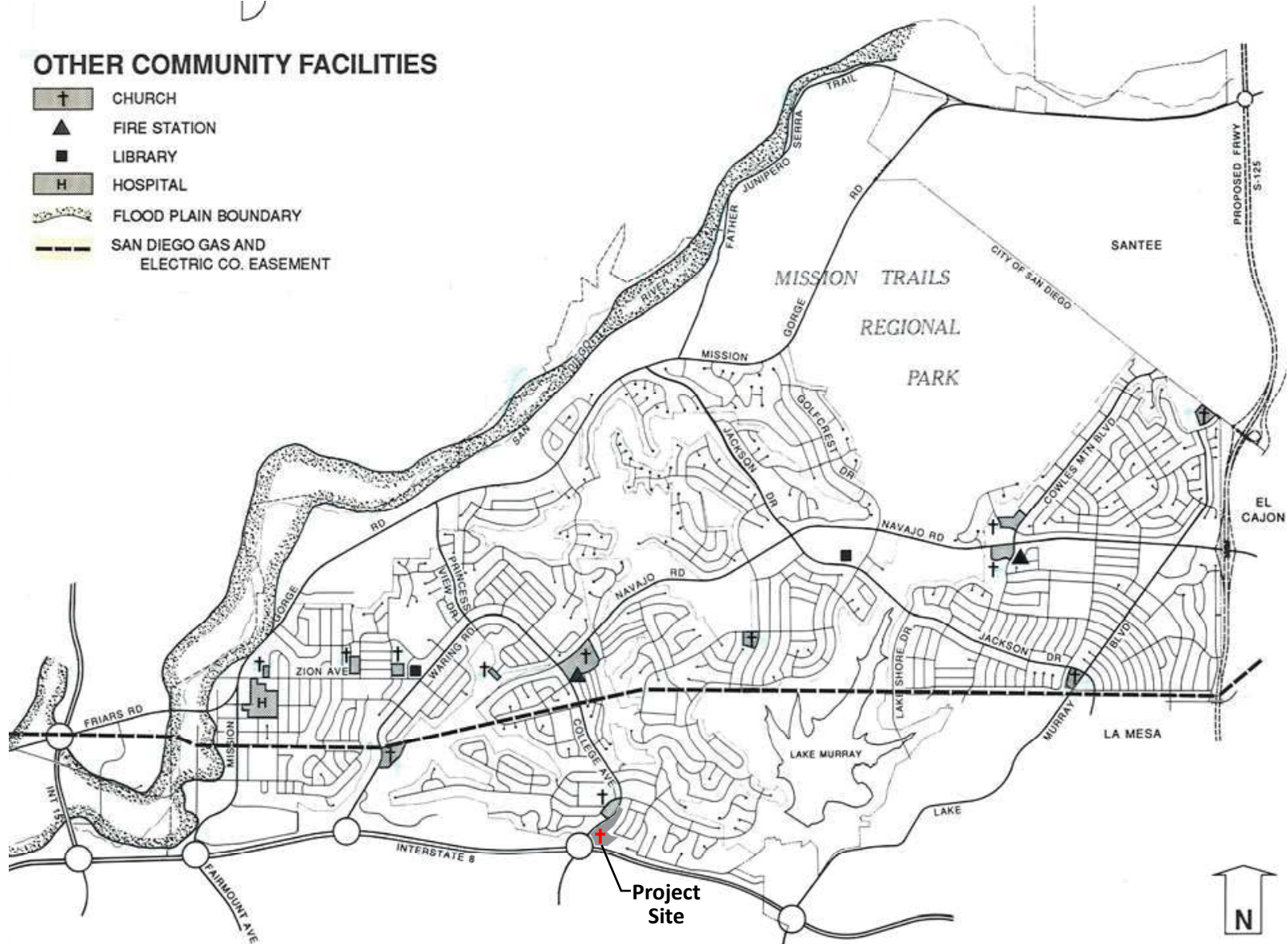
Source: Pasco Lauret Suiter & Associates 2022

Figure 3-7
Grading Plan
ALL PEOPLES CHURCH

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OTHER COMMUNITY FACILITIES

-  CHURCH
-  FIRE STATION
-  LIBRARY
-  HOSPITAL
-  FLOOD PLAIN BOUNDARY
-  SAN DIEGO GAS AND ELECTRIC CO. EASEMENT



Source: City of San Diego Planning Department, Navajo Community Plan 2015

Figure 3-8

Community Plan Amendment

ALL PEOPLES CHURCH

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4. HISTORY OF PROJECT CHANGES

This section chronicles changes that have been made to the project in response to environmental concerns raised during the City's review of the project. Since submittal of the application to the City Development Services Department, the project design has been revised as noted below in response to staff comments and is described as such in Chapter 3, *Project Description*:

- The majority of the church structure was lowered from 33 feet above finished grade to 30 feet above finished grade, with the exception of the three locations that would feature elevated architectural tower elements up to 45 to 48 feet above and the accompanying cross on the west elevation which would extend to 53 feet above the finished pad elevation.
- Hanging vines, shade trees, and planter boxes were added to the rooftop of the parking structure to shade its surface and soften its appearance.
- Architectural treatments (i.e., arched entries) similar to those on the church structure were added to the parking garage to enhance its aesthetic appearance.
- Landscape buffer screening consisting of large canopy shade trees was added along the common property line between the project improvements and off-site residential properties to the east.
- Existing slopes along College Avenue that are constructed at a slope ratio of 1.5:1 were graded down to a slope ratio of 2:1 for stability.
- To avoid grading into the California Transportation Department (Caltrans) Interstate 8 (I-8) easement as requested by Caltrans staff, retaining walls were placed along the southern edge of the property (see Appendix A for details).
- Landscape treatments were added above and below the retaining walls facing I-8 and College Avenue to screen and soften their appearance from offsite public vantage points.
- A 12-foot shared bicycle/pedestrian facility was added along College Avenue to facilitate non-motorized travel.
- Street trees were placed between the road and the non-contiguous sidewalk along College Avenue from project's southern boundary to the proposed signalized driveway to create a parkway and further screen the proposed parking areas north of the southern driveway.
- A gate was added to the northern driveway to prevent parking lot access during facility closures in response to community safety concerns.
- The off-site gravity sewer line connection was realigned from a southerly location through the adjacent fee-owned City parkland and beneath I-8. Instead, the proposed sewer force main would extend northerly parallel to and crossing through the eastern property line via a proposed private easement within a residential lot along Marne Avenue to a nearby sewer service connection within that road.

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5. ENVIRONMENTAL ANALYSIS

5.1 Land Use

This section discusses applicable land uses, plans and policies and the All Peoples Church Project's (project) compliance with those plans and policies. The discussion relies on planning and environmental information contained in other sections of this Environmental Impact Report (EIR), as applicable.

5.1.1 Existing Conditions

The approximately 6-acre project site consists of one parcel (Assessor's Parcel Number [APN] 463-010-10-00) at the northeast corner of Interstate 8 (I-8) and College Avenue interchange. The site is located in the southern portion of the Del Cerro neighborhood of the Navajo Community Plan area in the City of San Diego (City) (refer to Figure 2-4). The project site is within the RS-1-7 zone (refer to Figure 2-3 in Chapter 2, *Environmental Setting*), which is intended to accommodate single-family residential uses. The RS-1-7 development regulations permit a minimum lot area of 5,000 square feet (SF) and a maximum residential density of one dwelling unit (DU) for each 5,000 SF lot. The existing site is vacant and consists largely of a historically modified landscape with no naturally occurring steep slopes, that contains, native, non-native, disturbed habitat, and ornamental landscaping, as described in Chapter 2, *Environmental Setting*.

The project site is bounded by College Avenue on the west, the California Department of Transportation (Caltrans) right-of-way (ROW) including westbound I-8 off-ramp at College Avenue, and City of San Diego (City) Park and Recreation- owned dedicated parkland to the south, single-family homes along Marne Avenue and the western end of Glenmont Street to the east, and commercial properties to the north fronting Del Cerro Boulevard. Regionally, the project site can be accessed from I-8 via the College Avenue interchange, while local access to the site is provided by College Avenue south of Del Cerro Boulevard. The Caltrans ROW for the I-8 interchange occurs along the southern property line of the project site.

The broader surrounding area consists of housing, neighborhood-serving commercial uses, institutional uses, and parks. North and east of the project site are single-family homes, neighborhood commercial, and multi-family apartments. South of the project site is I-8, beyond which is the San Diego State University (SDSU) campus. West of the project site are single-family homes, Hearst Elementary, and a religious institution (Temple Emanu-El). The nearby neighborhood commercial along Del Cerro Boulevard offers a grocery store (Windmill Farms), Chevron gas station, medical offices, dine-in restaurants and fast-food eating establishments, and shopping services for the surrounding residents. Metropolitan Transit Service (MTS) Bus Routes 14 and 115 run along the site's western boundary and provide service to the SDSU Transit Center located at College Avenue and Hardy Avenue.

5.1.2 Regulatory Framework

The following discussion briefly describes land use plans, ordinances, and regulations that apply to the project, including the City's General Plan, Navajo Community Plan, Land Development Code

(LDC), Multiple Species Conservation Program (MSCP) Subarea Plan, Planned Development Permit (PDP) regulations (LDC Section 126.0601), Site Development Permit (SDP) regulations (LDC Section 126.0501) and Montgomery Field Airport Land Use Compatibility Plan (ALUCP).

5.1.2.1 Montgomery Field Airport Land Use Compatibility Plan

The Airport Land Use Commission (ALUC) is an agency that is required by state law to exist in counties in which there is a commercial and/or a general aviation airport. The purpose of the ALUCP is to protect public health, safety, and welfare by ensuring the orderly development of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports, to the extent that these areas are not already devoted to incompatible uses. The San Diego County Regional Airport Authority (SDCRAA) serves as the ALUC for Montgomery Field.

The Montgomery Field LUCP established the Airport Influence Area (AIA) for this airport. Essentially, the ALUCP serves as a tool for use by the SDCRAA in fulfilling its duty to review land use development proposals within the AIA at Montgomery Field. In addition, the ALUCP provides compatibility policies and criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances and to landowners in their design of new development. The most recent version of the Montgomery Field ALUCP was amended in December 2010 (SDCRAA 2010). The project site is located within the AIA for the airport, whose airfield is approximately 7 miles to northwest.

5.1.2.2 City of San Diego General Plan

The City approved its General Plan on March 10, 2008, after a comprehensive update. The General Plan is a comprehensive, long-term document that sets out a long-range vision and policy framework for how the City could grow and develop, provide public services, and maintain the qualities that define San Diego. Accordingly, the General Plan "provides policy guidance to balance the needs of a growing city while enhancing quality of life for current and future San Diegans" (City of San Diego 2008a). The General Plan is comprised of a Strategic Framework section and ten elements, many of which have been subsequently amended since their original adoption, including: Land Use and Community Planning (City of San Diego 2015b); Mobility (City of San Diego 2015c); Urban Design; Economic Prosperity (City of San Diego 2015d); Public Facilities, Services, and Safety (City of San Diego 2021a); Recreation (City of San Diego 2021b); Conservation; Historic Preservation; Noise (City of San Diego 2015e); and Housing (City of San Diego 2020a). The following discussion summarizes each element that is relevant and applicable to the project. For those that are not relevant, no further discussion is provided. In addition, applicable goals and policies within each element pertaining to the project are evaluated in detail as presented at the end of this section in **Table 5.1-1, City of San Diego General Plan Land Use Goals, Objectives, and Policies Consistency Evaluation.**

Strategic Framework

The Strategic Framework section provides an overarching strategy for how the city will grow while maintaining the qualities that best define San Diego. The General Plan and Strategic Framework incorporate the City of Villages strategy that focuses growth into compact, mixed-use, walkable centers linked to an improved regional transit system. A "village" is defined as the mixed-use

community or neighborhood center where residential, commercial, employment, and civic uses are integrated by pedestrian-friendly design characterized by inviting, accessible, and attractive building frontages, streets, and public spaces. This compact urban form reduces the need to travel and makes alternative modes of transportation easier to use. This is the first growth strategy in the City's history that focuses on infill development and allows limited expansion onto the City's remaining open spaces. The strategy's smart growth principles promote mixed-use development areas and focus development in areas that already contain the necessary infrastructure to support such development. There are no specific policies from the framework that are applicable to the project.

Land Use and Community Planning Element

The purpose of the Land Use and Community Planning Element (Land Use Element) is "to guide future growth and development into a sustainable citywide development pattern, while maintaining or enhancing quality of life in our communities" (City of San Diego 2015b). The Land Use Element addresses land use issues that apply to the City as a whole and identifies the community planning program as the mechanism to designate land uses, identify site-specific recommendations, and refine citywide policies, as needed. The Land Use Element establishes a structure that respects the diversity of each community and includes policies that govern the preparation of community plans. The Land Use Element addresses zoning and policy consistency, the plan amendment process, airport-land use planning, annexation policies, balanced communities, equitable development, and environmental justice. The project site is designated as "Residential" on Figure LU-2, General Plan Land Use and Street System, in the General Plan (refer to Figure 2-6 of this EIR).

The Land Use Element contains three goals related to amending community plans, which are applicable to the project since a Community Plan Amendment (CPA) is required:

- Approve plan amendments that better implement the General Plan and community plan goals and policies.
- Clearly define the process for amendments to community plans.
- Allow for changes that will assist in enhancing and implementing the community's vision.

Community plans are important because they contain detailed land use designations and site-specific policy recommendations than is possible at the citywide level including specific policies intended to respect essential community character. Future public and private projects are evaluated for consistency with land uses, goals and policies in the community plans. The specific policies in the Land Use and Community Planning Element that apply to project are contained in Table 5.1-1.

Mobility Element

The purpose of the Mobility Element is "to improve mobility through development of a balanced, multi-modal transportation network" (City of San Diego 2008a). The element identifies the proposed transportation network and strategies needed to support the anticipated General Plan land uses.

The Mobility Element's policies promote a balanced, multimodal transportation network to make walking, bicycling, and transit use more safe, attractive, and efficient forms of transportation, while addressing the needs of drivers. The Mobility Element contains policies that address multimodal transportation, parking, the movement of goods and services, and other components of a

transportation system while balancing the goals of protecting neighborhood characters and environmental resources. Together, these policies advance a strategy for relieving congestion and increasing transportation choices. Applicable policies from the element are contained in Table 5.1-1.

Urban Design Element

The purpose of the Urban Design Element is “to guide physical development toward a desired image that is consistent with the social, economic and aesthetic values of the city” (City of San Diego 2008a). The Urban Design Element policies capitalize on San Diego’s natural beauty and unique neighborhoods by calling for development that respects the natural setting, enhances the distinctiveness of its neighborhoods, strengthens the natural and built linkages, and creates mixed-use, walkable villages throughout the city. Urban Design Element policies help support and implement land use and transportation decisions, encourage economic revitalization, and improve the quality of life in San Diego. Ultimately, the Urban Design Element influences the implementation of all of the General Plan’s elements and community plans. It sets goals and policies for the pattern and scale of development as well as the character of the built environment. Urban Design Element policies that pertain to local development within the project area are contained in Table 5.1-1.

Public Facilities, Services, and Safety Element

The purpose of the Public Facilities, Services, and Safety Element (Public Facilities Element) is “to provide the public facilities and services needed to serve the existing population and new growth” (City 2021a). This element is directed at providing adequate public facilities and services through policies that address public financing strategies, public and developer financing responsibilities, prioritization, and the provision of specific facilities and services that must accompany growth. The policies within this element also apply to a wide range of public facilities and services including transportation, recreation, fire-rescue, police, wastewater collection and treatment, stormwater infrastructure, water supply and distribution, waste management, libraries, schools, public utilities, disaster preparedness and seismic safety.

Conservation Element

The purpose of the Conservation Element is for the city “to become an international model of sustainable development and conservation and to provide for the long-term conservation and sustainable management of the rich and natural resources that help define the City’s identity, contribute to its economy, and improve its quality of life.” This element contains policies to guide the conservation of the resources that are fundamental components of San Diego’s environment. Resources considered in the Conservation Element that are applicable to the project include water, land, air, biodiversity, recyclables, topography, views, and energy. Sustainable conservation practices are outlined in the policies, include those related to climate change. Specific City-wide policies with a conservation focus are also contained in the Land Use, Mobility, and Urban Design Elements of the General Plan, as well as the Conservation Element itself. The Conservation Element includes a reference to the City’s Climate Action Plan (CAP) (see separate discussion).

Noise Element

The Noise Element provides goals and policies to guide compatible land uses, and the incorporation of noise attenuation measures for new uses to protect people living and working in the City from

exposure to excessive noise. To evaluate noise compatibility, the Noise Element establishes noise compatibility guidelines for specific land uses (refer to Table 5.4-3 in Section 5.4, *Noise*, for the land use-noise compatibility table).

5.1.2.3 Climate Action Plan

The City adopted its CAP in December 2015 to outline the actions to be taken by the City to achieve its proportional share of state greenhouse gas (GHG) emission reductions consistent with California Air Resources Board requirements. The CAP serves as mitigation for the CEQA GHG/climate change impacts of the City's 2008 General Plan (City of San Diego 2015a). The General Plan calls for the City to reduce its carbon footprint through actions including adopting new or amended regulations, programs, and incentives. General Plan Policy CE-A.13 specifically identifies the need for an update of the City's 2005 Climate Protection Action Plan that identifies actions and programs to reduce the GHG emissions of the community-at-large, and City operations. Additionally, the CAP serves as a "Qualified GHG Reduction Plan" for purposes of tiering under CEQA. The CAP quantifies baseline GHG emissions for 2010; provides emissions forecasts for 2020 and 2035; establishes reduction targets for 2020 and 2035; identifies strategies and measures to reduce GHG levels; and provides guidance for monitoring progress on an annual basis. Implementation of the CAP relies on compliance with various policies within the General Plan and consistency with the underlying land use assumptions in the CAP.

The City initially adopted its CAP Consistency Checklist in July 2016; the form was revised in July 2017 (see Appendix B to this EIR). The CAP Consistency Checklist is part of the CAP and contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. As required by the CAP, the project proposes sustainable design features to minimize use of water, energy, and solid waste as outlined in Chapter 3, *Project Description*. Implementation of the measures would ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies designed to achieve the identified GHG reduction targets.

In August 2022, the City Council approved an update to the CAP to expand its approach and strategies for achieving the goal of net zero emissions by 2035 (City of San Diego 2022). As such, the 2022 CAP establishes a new goal, targets and actions that go beyond the 2015 CAP goal. The five strategies include: decarbonization of the built environment; access to clean and renewable energy; mobility and land use; circular economy and clean communities; resilient infrastructure and healthy ecosystems; and emerging climate actions. An implementation plan for the 2022 CAP is being developed by the City's Sustainability and Mobility Department to provide guidance on how to implement the new CAP strategies and measures; the implementation plan will be finalized within six to nine months of CAP adoption.

5.1.2.4 Navajo Community Plan

The project site is governed by the Navajo Community Plan (Community Plan), which was adopted by the San Diego City Council in 1982. Several amendments have occurred since its adoption, with the most recent amendment occurring in 2015. The Navajo area of San Diego is approximately 8,000 acres in size and is located in the easterly portion of the city. It includes the community areas of Allied Gardens, Del Cerro, Grantville and San Carlos. It is bounded on the north by Mission Gorge, on

the east by the cities of El Cajon and La Mesa, on the south by I-8 and on the west by the San Diego River channel. The overriding objectives for the long-range development of Navajo are to retain the residential character of the area, provide adequate community services, such as police and fire protection, rubbish collection, etc., establish guidelines for the utilization of canyons and hillsides and enhance the environment of the area as a pleasant community in which to live (City of San Diego 2010). Public and semi-public uses and single-family homes are the predominant land uses within the community.

In general, the Navajo Community is comprised of several distinctive neighborhoods and disparate areas due to the division of the community by various landforms and open spaces. To the west is Grantville, which is lower in elevation and features higher intensity residential and commercial uses, to the north are the open spaces associated with Mission Gorge and Mission Trails Regional Park, while in the center and east side of the community are San Carlos and Del Cerro, which feature residential neighborhoods interspersed with local commercial and institutional uses (i.e., religious assembly facilities). This project site is on the southern edge of the Community Plan area and interfaces directly with I-8, the College Community Plan Area and the SDSU campus across the freeway from the project area.

The Community Plan is intended to supplement General Plan policies by identifying specific community issues and policies that build on those already embodied in the General Plan. A community plan also provides more detailed land uses and describes the distribution of land uses better than is possible at the citywide level. Their community-specific detail is also used in review of both public and private development projects and informs the issue of development intensity.

The Navajo Community Plan identifies a “vision” for the future development of the Navajo community and contains policies that implement that vision. It also contains implementation strategies that establish the time and financing required to implement the policies of that vision. Elements are presented in terms of existing conditions, development potential or projected needs, objectives and proposals. A Community Plan land use map presents a composite of all major land use proposals.

The Community Plan discusses the community environment and major land uses: residential, commercial, open space, industrial, community facilities, and circulation. Elements are presented in terms of existing conditions, development potential or projected needs, objectives and proposals. With the exception of commercial and industrial elements, the goals and recommendations of the remaining elements relevant to the project are presented in Table 5.1-2, *Navajo Community Plan Goals and Recommendations Consistency Evaluation*, later in this section.

As presented in Chapter 2, *Environmental Setting*, the project site is identified as “Single Family” residential by the Navajo Community Plan land use map (Figure 4; also refer to Figure 2-4 of the EIR). The site is more specifically designated as Very Low/Low Density Residential use at a density range between 0 to 9 dwelling units per acre in the Community Plan’s Residential Element. The Community Plan also identifies community serving and public uses on the land use map and identifies community facilities such as schools, churches, fire stations, libraries and hospitals separately by patterns and individual symbols within Figures 23 and 24.

5.1.2.5 Land Development Code

San Diego Municipal Code (SDMC) Chapters 11 through 15 are referred to as the LDC, as they contain the City's land development regulations that dictate how land is to be developed and used within the City. The LDC contains citywide base zones, and the planned district ordinances that specify permitted land use; development standards such as density, floor area ratio, and other requirements for given zoning classifications; overlay zones; and other supplemental regulations that provide additional development requirements. The existing zoning of the project site is RS-1-7.

Development within the project area is subject to the development regulations of the LDC, including the Environmentally Sensitive Lands (ESL) regulations (LDC Sections 143.0101 through 143.0160), PDP regulations (LDC Section 126.0601), and SDP regulations (LDC Section 126.0501).

LDC Chapter 14 includes the general development regulations, supplemental development regulations, building regulations, and electrical/plumbing/mechanical regulations that govern all aspects of project development. The grading, landscaping, parking, signage, fencing, and storage requirements are all contained within the Chapter 14, *General Regulations*. Also included within Chapter 14 are the ESL Regulations, discussed below.

Planned Development Permit Regulations

The purpose of a PDP is to allow an applicant to request greater flexibility from the strict application of base zoning regulations than would normally be allowed. As stated in LDC Section 126.0601, "the intent is to encourage imaginative and innovative planning and to assure that the development achieves the purpose and intent of the applicable land use plan and that it would be preferable to what would be achieved by strict conformance with the regulations." Development that does not comply with the permitted uses in the base zone, or the development regulations of that zone, or proposes limited deviations from the applicable development regulations may apply for a PDP. In the case of the project, the PDP Regulations pertain to the four deviations from the development regulations of the RS-1-7 zone, as well as the proposed use, as described in Chapter 3, *Project Description*.

Site Development Permit Regulations

The purpose of a SDP is to establish a review process for proposed development that, because of its site, location, size, or some other characteristic, may have significant impacts on resources or on the surrounding area, even if developed in conformance with all regulations. As stated in LDC Section 126.0501, the intent of these procedures is to apply site-specific conditions as necessary to assure that the development does not adversely affect the applicable land use plan and to help ensure that all regulations are met. An SDP is required for the project because of impacts to ESL (i.e., sensitive habitat) located on site.

Environmentally Sensitive Lands Regulations

The purpose of the ESL Regulations (LDC Sections 143.0101 through 143.0160) is to protect, preserve and, where damaged, restore ESL and the viability of the species supported by those lands. The ESL Regulations apply to all proposed development when ESL, including sensitive biological resources, steep hillsides, floodplains, or coastal bluffs, are present. The regulations are designed to

ensure that development occurs in a manner that protects natural resources and the natural and topographic character of the area, and retains biodiversity and interconnected habitats. The ESL Regulations contain development regulations that are applied through an SDP in accordance with LDC Section 125.0502 when there is a potential for impacts to environmentally sensitive resources. It is intended for these regulations and accompanying guidelines to serve as standards for determination of impacts and mitigation under CEQA and also serve to implement the MSCP. Within the project area, ESL resources are limited to sensitive habitats.

5.1.3 Impact 1: Potential Conflicts with General or Community Plans

Issue 1: Would the project result in an inconsistency/conflict with the environmental goals, objectives, or recommendations of the General Plan or Community Plan in which it is located?

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

5.1.3.1 Impact Thresholds

According to the City's Significance Determination Thresholds (2020), land use policy impacts may be significant if the project would be:

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

An inconsistency with a plan is not by itself a significant environmental impact. For an inconsistency to have an impact; the inconsistency must relate to an environmental issue (i.e., cause a direct or indirect physical change to the environment) to be considered significant under the California Environmental Quality Act (CEQA).

5.1.3.2 Impact Analysis

This section addresses adopted plans with environmental goals, objectives, and/or guidelines used to make land use decisions in the city that are relevant to the project. The project includes a CPA that would address any land use consistency with adopted plan documents. The CPA would specifically amend the Other Community Facilities map (Figure 24) to add a "church" symbol which would designate the site as a church and allow the proposed religious assembly use. No change to the Community Plan's Land Use map (Figure 4) nor the site's residential zoning is proposed.

General Plan Consistency

A summary discussion of the project's consistency with the various applicable elements of the General Plan is provided herein with the details located at the end of this section wherein specific policy references are provided in Table 5.1-1, *City of San Diego General Plan Land Use Goals, Objectives, and Policies Consistency Evaluation*.

With regard to the Land Use and Community Planning Element, the project requires approval of a CPA to add "church" symbol to the Other Community Facilities figure in the Navajo Community Plan but would maintain the site's residential land use designation consistent with Policies LU-C.3, LU-D.1, LU-D.3 and LU-D.8.

The General Plan Urban Design Element addresses urban form and design through policies aimed at respecting the natural environment and preserving open space systems. The project supports and implements a number of the policies of the Urban Design Element (as described in Section 5.5, *Visual Effects and Neighborhood Character*). Specifically, the project design would be sensitive to the adjacent natural areas off-site (Policy UC-A.3); sustainable building materials would be used (Policy UC-A.4); the building and parking structure's architecture and site plan layout would be compatible with but distinctive from the neighborhood character and community while minimizing the visibility of its features (Policies UC-A.5, UD-A.11, and UD-A.12); extensive landscape materials would be used to define spaces, encourage circulation paths, highlight entry points, provide visual relief, shade parking areas, and screen retaining walls and off-site properties (Policy UD-A.8); and the improvements to College Avenue would enhance the streetscape while providing screening to the site improvements (Policies UD-A.10, UD-B.4, and UD-C.7), among other policy-related expectations of the General Plan.

The project would provide on-site water, sewer, and stormwater infrastructure that are sized based on the project's demands, and levels of service would be maintained after project construction is complete, consistent with the Public Facilities, Services, and Safety Element Policies PF-C.1, PF-F.6, and PF-G.1 through PF-G.5. Seismic safety features would be integrated into the project in accordance with Policy PF-Q.1.

Sustainability features and practices of the project combined with the architectural and landscape design elements would establish a theme for the property and incorporate green building techniques in accordance with the California Building Code (CBC) and GHG reduction strategies in the project's CAP Consistency Checklist, in accordance with Policy CE-A.5 of the Conservation Element. The project would implement a waste management plan (WMP), consistent with the City's goals concerning waste management and reduction in Conservation Element Policies CE-A.8 through CE-A.12. In addition, the project includes flow-through biofiltration planters to collect and treat runoff before it is discharged to the off-site stormwater system, in accordance with the urban runoff goals of Conservation Element Policies CE-E.2, CE-E.3, and CE-E.6. The project's landscaping would meet the City's water conservation and urban forestry goals in compliance with Policies CE-I.4 and CE-J.4.

With respect to the General Plan policies concerning noise and land use compatibility, the project is located in an area surrounded by urban uses and experiences transportation noise from major roadways and freeways. The project is consistent with the land use-noise compatibility standards in the Noise Element (refer to Table 5.4-3 in this EIR); therefore, the project is consistent with

Policies NE-A.2, NE-A.4, NE-A.5, and NE-B.1 through NE-B.3 pertaining to land use compatibility, as discussed further below under Impact 5.

Overall, the project design is reflective of the goals and policies intended to support the General Plan policies. Therefore, land use impacts related to policy consistency with the General Plan would be less than significant. Refer to Table 5.1-1 at the end of this section for a detailed discussion of the project's General Plan policy compliance.

Climate Action Plan Consistency

The project would help implement the goals and objectives of the CAP by promoting energy and water efficient buildings, including design strategies to encourage bicycling, walking, and transit use. The proposed project contains specific features for multi-modal improvements that would facilitate access to transit and reduce visitor reliance on single-occupancy vehicles through the use of electric vehicle charging stations, bicycle parking spaces, and parking spaces designated for a combination of low-emitting, fuel-efficient, and carpool/vanpool vehicles in accordance with the CAP Consistency Checklist as referenced in Chapter 3, *Project Description* (Baranek Consulting Group 2021; Appendix B to this EIR). Land use impacts related to policy consistency with the CAP would be less than significant.

Community Plan Consistency

The project requires approval of a CPA to add "church" use to the Other Facilities Map in the Community Plan, similar to other religious institutions in the community, as described in the *Project Description* chapter of this EIR. The Navajo Community Plan Land Use map does not provide a separate land use designation for churches or places of religious assembly. Instead, these types of community facilities are identified as "church" on the Other Community Facilities map (Figure 24) of the Navajo Community Plan (as shown in Figure 3-7 of the EIR). The proposed CPA would retain the Single Family residential land use designation on the Community Plan's Land Use map (Figure 4) and identify and designate the site for church use like other similar uses in the Navajo community.

The proposed CPA was initiated by the City Planning Commission at their July 19, 2018, meeting. Issues identified during the CPA initiation process addressed site design relative to the natural environment of the site; the appropriateness of the land use for the site; and access to the site with regard to the Navajo community, all of which are addressed in Chapter 5, *Environmental Analysis*, Chapter 6, *Cumulative Impacts*, and Chapter 7, *Other CEQA Considerations*, of this EIR.

With regard to the principal objective of the Community Plan to maintain, enhance and encourage residential housing, the project would maintain the existing residential land use designation and zoning on the site. A project objective is to provide a church-owned property for an existing congregation and would involve the construction of a non-residential, religious assembly use rather than housing. Accordingly, the project has been designed to be sensitive to the existing neighborhood. With regard to the Residential Element policies, the site layout and architectural design incorporate careful planning and sensitive development features that: would create a well-defined, balanced and visually consistent design that is distinctive from the surrounding residential neighborhood; would be situated in the topographic low point of the site near the College Avenue off-ramp and setback from the adjacent, lower profile residential and commercial structures nearby; would feature extensive landscaping, including screening along the common property line with the

nearby residential yards to conceal and soften views of facilities, walls and rooftops; would produce a positive visual appearance through its comprehensive design from public vantage points that surround the site; would screen or conceal parking areas with landscaping or structures from public viewing points; and would use imaginative and innovative design to create visual interest and aesthetic appeal.

The Community Environment Element of the Community Plan encourages an overall quality of design through building placement, landscaping, and natural elements. The project would be consistent with the policies in the Community Plan through its comprehensive design that coordinates its grading, architecture, and landscape to collectively provide visual interest and break up the massing of the structures such that the project would not exceed the bulk and scale of existing patterns of development by a substantial margin. The project's landscape improvements along College Avenue would remove the existing sidewalk and create a landscaped parkway with non-contiguous sidewalk featuring street side canopy trees and ground cover. The project balances its placement between urban uses with its proximity to undeveloped areas by creating grading and landscape transitions and installing biofiltration basins to protect water quality.

Circulation policies in the Community Plan are also adhered to since project improvements along the frontage would create a signalized intersection, an upgraded sidewalk experience, pedestrian linkages into the site and striping to create a bike lane. The visual character of College Avenue would be enhanced through landscape treatments and the installation of canopy trees within the parkway.

As shown in **Table 5.1-2, Navajo Community Plan Goals and Recommendations Consistency Evaluation**, the proposal to add the church use to the project site would not create any inconsistencies with the policies in the Community Plan (as illustrated in Figure 3-1 through Figure 3-6 of this EIR) and less-than-significant land use policy impacts are identified.

Land Development Code Regulations Consistency

A PDP is required for the church use on the project site as that the project complies with the applicable land use plan designation but is not permitted in the underlying base residential zone (i.e., RS-1-7). Approval of the CPA would allow the religious assembly use within the residential designation to be consistent with the Community Plan. The PDP would allow for the religious assembly use within the RS-1-7 zone and would also allow approval of deviations from the development regulations of the zone. There are four proposed deviations from the RS-1-7 development regulations that would be allowed by approval of the PDP (as summarized in Table 3-1 in Chapter 3, *Project Description*). The deviations pertain to increased building height to construct a structure that conveys an institutional use and creates architectural interest; increased retaining wall height to create buildable pads and avoid grading in the Caltrans ROW; reduced side yard setback to accommodate the irregular lot configuration relative to College Avenue; and to correlate the required number of long-term bike parking spaces to the number of staff, instead of the congregation who are short-term bicycle users. The proposed deviations related to the project design features would result in less-than-significant aesthetic impacts as discussed in Section 5.5, *Visual Effects and Neighborhood Character*, of this EIR.

Impacts to sensitive habitat on-site require approval of an SDP. Mitigation would be required to offset the project's direct impacts to sensitive habitat outside the City of San Diego's Multi-Habitat Planning Area (MHPA) and would comply with the City's MSCP, as enforced by compliance with the

ESL Regulations of the City's LDC. Therefore, the project would result in less-than-significant land use impacts with mitigation incorporated. The sensitive resources mitigation requirements are discussed in Section 5.2, *Biological Resources*, of this EIR.

5.1.3.3 Significance of Impacts

Potential land use plan consistency impacts would be less than significant because the proposed use and project design would be consistent with existing applicable local and regional land use plans, policies, and regulations as discussed above.

5.1.3.4 Mitigation Monitoring and Reporting

No significant impacts are identified; no mitigation measures are required.

5.1.4 Impact 2: Physical Community Division

Issue 3: Would the project physically divide an established community?

5.1.4.1 Impact Threshold

According to the City's Significance Determination Thresholds (2020), land use policy impacts may be significant if the project would be:

- Physically divide an established community.

5.1.4.2 Impact Analysis

The project site is designated and zoned for residential use. The surrounding project area is composed of residential neighborhoods interspersed with commercial, educational, and religious facilities, as well as undeveloped hillsides and open space. The project site generally sits below the residential lots to the east and does not have access to neighborhood streets. The site is separated from the neighborhood to the west by College Avenue, a major street. The project is proposed on an infill site located between College Avenue and a residential neighborhood to the east. No change to the local circulation patterns would occur as the project would involve the extension of a private driveway and secondary entrance to the site along College Avenue. In addition, the project would not introduce any barriers or project features that could physically divide the established Navajo community.

5.1.4.3 Significance of Impacts

The project would not physically divide an established community and a less-than-significant land use impact would occur.

5.1.4.4 Mitigation Monitoring and Reporting

No significant impacts are identified; no mitigation measures are required.

5.1.5 Impact 3: Compatibility with Airport Comprehensive Land Use Plan

Issue 4: Would the project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP), including aircraft safety and noise levels as defined by the plan?

5.1.5.1 Impact Threshold

According to the City's Significance Determination Thresholds (2020), land use policy impacts may be significant if the project would be:

- An incompatible use as defined in an airport land use plan or would result in an inconsistency with an airport's Land Use Compatibility Plan, as adopted by the Airport Land Use Commission (ALUC), to the extent that the inconsistency is based on valid data.

5.1.5.2 Impact Analysis

The project site is in the Airport Land Use Compatibility Overlay Zone (ALUCOZ) and AIA for Montgomery Field. Review Area 2 of the AIA consists of locations within the airspace protection and/or overflight notification areas. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2. Although the project site is located in Review Area 2 for Montgomery Field, the City determined that a ALUCP review of the project would be unnecessary because of the site's location topographically below surrounding land uses and the building's low stature relative to airspace restrictions. Project implementation would not increase the potential for a safety hazard related to airports for people residing or working in areas surrounding the project site. The project would not interfere with the operations of the airport; less-than-significant impacts would occur.

5.1.5.3 Significance of Impacts

The project would not conflict with the ALUCOZ and ALUCP, nor would it interfere with operations of Montgomery Field; therefore, impacts would be less than significant.

5.1.5.4 Mitigation Monitoring and Reporting

No significant impacts are identified; no mitigation measures are required.

5.1.6 Impact 4: Potential Exposure to Excessive Noise Levels

Issue 5: Would the proposal result in the exposure of sensitive receptors to current or future noise levels that would exceed standards established in the Noise Element of the General Plan?

5.1.6.1 Impact Threshold

According to the City's Significance Determination Thresholds (2020), land use policy impacts may be significant if the project would be:

- Expose new development to noise levels at exterior use areas or interior areas in excess of the noise compatibility guidelines established in the City General Plan Noise Element (shown in Table 5.4-3).

5.1.6.2 Impact Analysis

The City's land use-noise compatibility table provides a tool to gauge the compatibility of new land uses relative to existing noise levels. The table, presented as Table 5.4-3 in Section 5.4, *Noise*, of this EIR, identifies compatible, conditionally compatible, and incompatible noise levels for various land uses. According to the table, the land use-noise compatibility standard applied to places of worship or religious assembly spaces is 75 decibels (dBA). As shown in Table 5.4-1, the ambient noise level recorded on the project site is 68.7 decibel (dBA) Community Noise Equivalent Level (CNEL) and Table 5.4-6 shows that noise levels in the vicinity of the project would not exceed this level in the Existing Plus Project condition. Therefore, the proposed church use would be compatible with the on-site noise environment and less-than-significant land use impacts related to noise compatibility would occur.

5.1.6.3 Significance of Impacts

The proposed church would be compatible with the City's Noise Element of the General Plan. Therefore, no significant impacts related to noise-land use compatibility would occur.

5.1.6.4 Mitigation Monitoring and Reporting

No significant impacts are identified; no mitigation measures are required.

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN		
Land Use and Community Planning Element		
General Plan Land Use Categories Goals		
<i>Policy LU-C.3:</i> Maintain or increase the City's supply of land designated for various residential densities as community plans are prepared, updated, or amended.	The project requires approval of a CPA to the Navajo Community Plan to allow a church/religious assembly use for the project site. Approval of the CPA would not change the site's underlying residential land use designation and zoning. The project would comply with Policy LU-C.3.	Yes
<i>Policy LU-D.1:</i> Require a General Plan and community plan amendment for proposals that involve: a change in community plan adopted land use or density/intensity range; a change in the adopted community plan development phasing schedule; or a change in plan policies, maps, and diagrams	The project proposes a CPA to the Navajo Community Plan to address the change in land use needed to allow the religious assembly use. The project would comply with Policy LU-D.1.	Yes
<i>Policy LU-D.3:</i> Evaluate all privately proposed plan amendment and City-initiated land use designation amendment requests through the plan amendment initiation process and present the proposal to the Planning Commission or City Council for consideration.	The CPA was initiated in June 2018 through a hearing with the Planning Commission. The project would comply with Policy LU-D.3.	Yes
<i>Policy LU-D.5:</i> Maintain and update on a regular basis a database of land use plan amendments approved by the City in order to create an annual report for tracking of land use plan amendments.	The project proposes a CPA that upon approval can be recorded by the City in its database consistent with Policy LU-D.5.	Yes
<i>Policy LU-D.8:</i> Require that General Plan and community plan amendment initiations be decided by the Planning Commission with the ability for the applicant to submit a request to the City Clerk for the City Council to consider the initiation if it is denied. The applicant must file the request with the City Clerk within 10 business days of the Planning Commission denial.	The CPA was initiated in June 2018 at a hearing with the Planning Commission. The project would comply with Policy LU-D.8.	Yes

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<i>Policy LU-D.10:</i> Require that the recommendation of approval or denial to the Planning Commission be based upon compliance with all of the three initiation criteria as follows: a) the amendment request appears to be consistent with the goals and policies of the General Plan and community plan and any community plan specific amendment criteria; b) the proposed amendment provides additional public benefit to the community as compared to the existing land use designation, density/intensity range, plan policy or site design; and c) public facilities appear to be available to serve the proposed increase in density/ intensity, or their provision will be addressed as a component of the amendment process.	The proposed CPA was reviewed and initiated by Planning Commission in a June 2018 hearing in accordance with Policy LU-D.10.	Yes
<i>Policy LU-D.11:</i> Acknowledge that initiation of a plan amendment in no way confers adoption of a plan amendment, that neither staff nor the Planning Commission is committed to recommend in favor or denial of the proposed amendment, and that the City Council is not committed to adopt or deny the proposed amendment.	The proposed CPA was initiated in June 2018 at a hearing with the Planning Commission. The project would comply with Policy LU-D.11.	Yes
<i>Land Use and Community Planning Element Policies Related to Zoning Consistency</i>		
<i>Policy LU-F.2:</i> Review public and private projects to ensure that they do not adversely affect the General Plan and community plans. Evaluate whether proposed projects implement specified land use, density/intensity, design guidelines, and other General Plan and community plan policies including open space preservation, community identity, mobility, and the timing, phasing, and provision of public facilities.	The proposed site design improvements and off-site improvements and utility infrastructure improvements would be consistent with this policy from the General Plan.	Yes

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Urban Design Element		
Sustainable Development		
<p><i>Policy UD-A.3.</i> Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.</p> <ul style="list-style-type: none"> a. Provide increased setbacks from canyon rims or open space areas to ensure that the visibility of new development is minimized. b. Screen development adjacent to natural features as appropriate so that development does not appear visually intrusive, or interfere with the experience within the open space system. The provision of enhanced landscaping adjacent to natural features could be used to soften the appearance of or buffer development from the natural features. c. Use building and landscape materials that blend with and do not create visual or other conflicts with the natural environment in instances where new buildings abut natural areas. This guideline must be balanced with a need to clear natural vegetation for fire protection to ensure public safety in some areas. d. Design and site buildings to permit visual and physical access to the natural features from the public right-of-way. e. Encourage location of entrances and windows in development adjacent to open space to overlook the natural features. f. Protect views from public roadways and parklands to natural canyons, resource areas, and scenic vistas. 	<p>The project site is not adjacent to lands designated for open space but rather residentially designated undeveloped lands that reside below nearby homes. A 2.0-acre parkland parcel is situated south of the property. The project design would create landscaped, manufactured slopes that would blend with the off-site terrain and parkland to the south and east. The proposed structures would be setback from and/or recessed into the terrain such that they would not block views of the adjacent slopes from the public rights of way. The project would be consistent with this policy from the General Plan.</p>	<p>Yes</p>

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<p><i>Policy UD-A.4.</i> Use sustainable building methods in accordance with the sustainable development policies in the Conservation Element.</p>	<p>Consistent with Policy UD-A.4, the project would incorporate the following sustainable design features as conditions of approval to minimize use of water, energy, and solid waste:</p> <ul style="list-style-type: none"> • Cool/green roofs • Use of low-flow fixtures/appliances and low-flow irrigation • Electrical vehicle charging stations • Designated and secure bicycle parking spaces • Designated parking spaces low-emitting, fuel-efficient, and carpool/vanpool vehicles • Implementation of a solid waste recycling plan 	<p>Yes</p>
Architecture		
<p><i>Policy UD-A.5.</i> Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.</p> <ol style="list-style-type: none"> Relate architecture to San Diego's unique climate and topography. Encourage designs that are sensitive to the scale, form, rhythm, proportions, and materials in proximity to commercial areas and residential neighborhoods that have a well-established, distinctive character. Provide architectural features that establish and define a building's appeal and enhance the neighborhood character. Encourage the use of materials and finishes that reinforce a sense of quality and permanence. Provide architectural interest to discourage the appearance of blank walls for development. This would include not only building walls, but fencing bordering the pedestrian network, where some form of architectural variation should be provided to add interest to the streetscape and enhance the pedestrian 	<p>As indicated in Policy UD-A.5, the project would exhibit a contemporary Spanish Colonial Revival-style theme featuring arched entrances and windows along its painted concrete tilt-up facades, with accents of wood facia and terra cotta colored tile roofing materials. The glazing for each window would be tinted bronze in color. The architectural style resembles that of academic buildings at the SDSU campus which is visible from the project site.</p> <p>With regard to the architectural design and scale, the majority of the church/sanctuary building and its parapet wall around the flat roof areas would comply with the 30-foot height limit in the RS-1-7 zone. To create visual interest, the pitched roof towers would extend up to 45 to 48 feet above grade and the rooftop extension (i.e., cross on the west elevation) would extend an additional 8 feet above the 45-foot roof tower to 53 feet above grade, requiring a deviation from the RS-1-7 zone development regulations. The building rooflines and cross would be set back from the adjacent residential lots along Marne Avenue and the west end of Glenmont Street. Articulated façades and landscape treatment would be provided to increase visual interest and create a cohesive design. The project would highlight natural materials and colors, usable outdoor spaces, and</p>	<p>Yes</p>

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<p>experience. For example, walls could protrude, recess, or change in color, height or texture to provide visual interest.</p> <p>f. Design building wall planes to have shadow relief, where pop-outs, offsetting planes, overhangs and recessed doorways are used to provide visual interest at the pedestrian level.</p> <p>g. Maximize natural ventilation, sunlight, and views.</p> <p>h. Provide convenient, safe, well-marked, and attractive pedestrian connections from the public street to building entrances.</p>	<p>climate-appropriate, and drought-tolerant landscaping. Refer to Section 5.5, <i>Visual Effects and Neighborhood Character</i>, for additional details on the project's compliance with Policy UD-A.5.</p>	
<p><i>Policy UD-A.8.</i> Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.</p> <p>a. Maximize the planting of new trees, street trees and other plants for their shading, air quality, and livability benefits (see also Conservation Element, Policies CE-A.11, CE-A.12, and Section J)</p> <p>b. Use water conservation through the use of drought-tolerant landscape, porous materials, and reclaimed water where available.</p> <p>c. Use landscape to support storm water management goals for filtration, percolation and erosion control.</p> <p>d. Use landscape to provide unique identities within neighborhoods, villages and other developed areas.</p> <p>e. Landscape materials and design should complement and build upon the existing character of the neighborhood.</p> <p>f. Design landscape bordering the pedestrian network with new elements, such as a new plant form or material, at a scale and intervals appropriate to the site. This is not intended to discourage a uniform street tree or landscape theme, but to add interest to the streetscape and enhance the pedestrian experience.</p>	<p>The proposed landscape plan features the use of native/naturalized and/or drought-tolerant plant material throughout the project site (see Figure 3-6). Plant material would be used throughout the site to help define spaces, encourage circulation paths, highlight entry points, provide visual relief, shade parking areas, and screen retaining walls and off-site properties. On site landscaping would include canopy trees and raised box plantings on the upper deck of the parking structure and in the parking areas, accent planting zones featuring palms and focal point species, and ground cover, shrubs and trees used for slope plantings. A minimum 5-foot-wide landscape buffer containing spreading ground covers, taller screening shrubs and canopy trees, ranging in height from 25 to 40 feet, would be installed between the proposed surface parking areas and residential properties to the east. Landscape improvements along College Avenue would create a 10- to 16-foot-wide landscaped parkway with sidewalk featuring street side canopy plantings and ground covers. In addition, plant material would be placed within the stormwater biofiltration basins that would be constructed as part of the project. Entry monumentation and landscape treatments would be installed on site at the southeast corner near the driveway entrance to provide aesthetic appeal and give identification to the project entry. The project would comply with Policy UD-A.8.</p>	<p>Yes</p>

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<ul style="list-style-type: none"> g. Establish or maintain tree-lined residential and commercial streets. Neighborhoods and commercial corridors in the city that contain tree-lined streets present a streetscape that creates a distinctive character. <ul style="list-style-type: none"> 1. Identify and plant trees that complement and expand on the surrounding street tree fabric. 2. Unify communities by using street trees to link residential areas. 3. Locate street trees in a manner that does not obstruct ground illumination from streetlights. h. Shade paved areas, especially parking lots. i. Demarcate public, semi-public/private, and private spaces clearly through the use of landscape, walls, fences, gates, pavement treatment, signs, and other methods to denote boundaries and/or buffers. j. Use landscaped walkways to direct people to proper entrances and away from private areas. k. Reduce barriers to views or light by selecting appropriate tree types, pruning thick hedges, and large overhanging tree canopies. l. Utilize landscape adjacent to natural features to soften the visual appearance of a development and provide a natural buffer between the development and open space areas. 		

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Street Design		
<p><i>Policy UD-A.10.</i> Design or retrofit streets to improve walkability, bicycling, and transit integration; to strengthen connectivity; and to enhance community identity. Streets are an important aspect of Urban Design as referenced in the Mobility Element (see also Mobility Element, Sections A, B, C, and F).</p>	<p>Off-site improvements to the College Avenue intersection would include creating a break and narrowing of the existing raised median, constructing a new southbound left-turn lane, striping a northbound right-turn lane and installing a crosswalk. A new traffic signal would be installed at the completed intersection. To enhance the pedestrian experience along the project's College Avenue frontage, a 12-foot shared (i.e., pedestrians and bicycles) contiguous sidewalk would be installed south of the project driveway and north of the driveway a 5-foot-wide, non-contiguous sidewalk and landscaped parkway with street trees would be constructed. Canopy trees and other plant material would be installed adjacent to the sidewalks to enhance the pedestrian experience. Stairs and a ramp would be extended on site to link the College Avenue sidewalk to the church/sanctuary building and entry plaza. The proposed improvements would enhance the bicycle circulation and pedestrian environment consistent with Policy UD-A.10.</p>	Yes
<p><i>Policy UD-A.11.</i> Encourage the use of underground or above-ground parking structures, rather than surface parking lots, to reduce land area devoted to parking (see also Mobility Element, Section G).</p> <ul style="list-style-type: none"> a. Design safe, functional, and aesthetically pleasing parking structures. b. Design structures to be of a height and mass that are compatible with the surrounding area. c. Use building materials, detailing, and landscape that complement the surrounding neighborhood. d. Provide well-defined, dedicated pedestrian entrances. e. Use appropriate screening mechanisms to screen views of parked vehicles from pedestrian areas, and headlights from adjacent buildings. 	<p>The project includes a two-level parking structure that would be recessed into the terrain such that the top deck would be below grade of College Avenue. The lower and upper parking levels of the structure would be connected through an internal vehicle ramp. The primary surface parking lot would be constructed north of the parking structure at grade with College Avenue and connected to the upper level of the parking structure via internal roads. Smaller surface parking areas would be provided behind the parking structure and church/sanctuary building as shown on the project site plan (Figure 3-1). The project's distinctive architecture and landscaping would create a positive aesthetic while integrating screening from the nearby community. The project would be consistent with Policy UD-A.11.</p>	Yes

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<p>f. Pursue development of parking structures that are wrapped on their exterior with other uses to conceal the parking structure and create an active streetscape. Where ground floor commercial is proposed, provide a tall, largely transparent ground floor along pedestrian active streets.</p> <p>g. Encourage the use of attendants, gates, natural lighting, or surveillance equipment in parking structures to promote safety and security.</p>		
<p><i>Policy UD-A.12.</i> Reduce the amount and visual impact of surface parking lots (see also Mobility Element, Section G).</p> <p>a. Encourage placement of parking along the rear and sides of street-oriented buildings.</p> <p>b. Avoid blank walls facing onto parking lots by promoting treatments that use colors, materials, landscape, selective openings or other means of creating interest. For example, the building should protrude, recess, or change in color, height or texture to reduce blank facades.</p> <p>c. Design clear and attractive pedestrian paseos/pathways and signs that link parking and destinations.</p> <p>d. Locate pedestrian pathways in areas where vehicular access is limited.</p> <p>e. Avoid large areas of uninterrupted parking especially adjacent to community public view sheds.</p> <p>f. Build multiple small parking lots in lieu of one large lot.</p> <p>g. Retrofit existing expansive parking lots with street trees, landscape, pedestrian paths, and new building placement.</p> <p>h. Promote the use of pervious surface materials to reduce runoff and infiltrate storm water.</p>	<p>The project would limit the amount and visibility of the parking areas by recessing the two-story parking structure into the terrain and placing the surface parking at grade with its top deck and behind the parking structure and church/sanctuary building. The entrances to the parking structure would be demarcated with arched entry points which align with the entry to the building and surface parking areas to the east. Pedestrian pathways between the parking structure and building entrance would feature entry landscaping and be clearly marked at the concrete driveway as shown in Figure 3-6. The project would be consistent with Policy UD-A.12.</p>	<p>Yes</p>

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<ul style="list-style-type: none"> i. Use trees and other landscape to provide shade, screening, and filtering of storm water runoff in parking lots (see also Conservation Element, Policy CE-A.12). j. Design surface parking lots to allow for potential redevelopment to more intensive uses. For example, through redevelopment, well-placed parking lot aisles could become internal project streets that provide access to future parking structures and mixed land uses. 		
Lighting		
<p><i>Policy UD-A.13.</i> Provide lighting from a variety of sources at appropriate intensities and qualities for safety.</p> <ul style="list-style-type: none"> a. Provide pedestrian-scaled lighting for pedestrian circulation and visibility. b. Use effective lighting for vehicular traffic while not overwhelming the quality of pedestrian lighting. c. Use lighting to convey a sense of safety while minimizing glare and contrast. d. Use vandal-resistant light fixtures that complement the neighborhood and character. e. Focus lighting to eliminate spill-over so that lighting is directed, and only the intended use is illuminated. 	<p>Lighting would be provided in various settings for safety and aesthetic purposes. Lighting would be provided in the surface parking lots, parking lot, private driveway, and along pedestrian walkways. Lighting for all of these purposes would be intentionally directed such that the intended area is illuminated and spillover lighting into sensitive areas (e.g., residences) is avoided as required by SDMC Section 142.0740. These lighting practices would be consistent with Policy UD-A.13.</p>	Yes

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Utilities		
<p><i>Policy UD-A.16.</i> Minimize the visual and functional impact of utility systems and equipment on streets, sidewalks, and the public realm.</p> <ul style="list-style-type: none"> a. Convert overhead utility wires and poles, and overhead structures such as those associated with supplying electric, communication, community antenna television, or similar service to underground. b. Design and locate public and private utility infrastructure, such as phone, cable and communications boxes, transformers, meters, fuel ports, back-flow preventers, ventilation grilles, grease interceptors, irrigation valves, and any similar elements, to be integrated into adjacent development and as inconspicuous as possible. c. To minimize obstructions, elements in the sidewalk and public right of way should be located in below grade vaults or building recesses that do not encroach on the right of way (to the maximum extent permitted by codes). If located in a landscaped setback, they should be as far from the sidewalk as possible, clustered and integrated into the landscape design, and screened from public view with plant and/or fencelike elements. d. Traffic operational features such as streetlights, traffic signals, control boxes, street signs and similar facilities should be located and consolidated on poles, to minimize clutter, improve safety, and maximize public pedestrian access, especially at intersections and sidewalk ramps. Other street utilities such as storm drains and vaults should be carefully located to afford proper placement of the vertical elements. 	<p>All utilities to serve the project would be installed during construction and undergrounded, as described in Section 7.1.13 Utilities and Service Systems. Therefore, the project would result in minimal visual intrusion related to utility systems, consistent with Policy UD-A.16. Visual clutter related to utility systems and traffic control would be avoided through proper siting, screening, and integration into structures. The project would minimize the visibility of utility systems consistent with Policy UD-A.16.</p>	<p>Yes</p>

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Street Frontages		
<p><i>Policy UD-B.4.</i> Create street frontages with architectural and landscape interest for both pedestrians and neighboring residents.</p> <ul style="list-style-type: none"> a. Locate buildings on the site so that they reinforce street frontages. b. Relate buildings to existing and planned adjacent uses. c. Provide ground level entries and ensure that building entries are prominent and visible. d. Maintain existing setback patterns, except where community plans call for redevelopment to change the existing pattern. e. Locate transparent features such as porches, stoops, balconies, and windows facing the street to promote a sense of community. f. Encourage side- and rear-loaded garages. Where not possible, reduce the prominence of the garage through architectural features and varying planes. g. Minimize the number of curb-cuts along residential streets. 	<p>The church/sanctuary building and parking structure would be setback from College Avenue and recessed into the terrain. The aesthetics of the streetscape and entry monumentation would be enhanced with the installation of a parkway with landscaping as shown in the visual simulations provided in Section 5.5, <i>Visual Effects and Neighborhood Character</i>. The project would be consistent with Policy UD-B.4.</p>	<p>Yes</p>
Streetscape		
<p><i>Policy UD-C.7.</i> Enhance the public streetscape for greater walkability and neighborhood aesthetics (see also Policy UD-A.10 and Section F.)</p> <ul style="list-style-type: none"> b. Establish build-to lines, or maximum permitted setbacks on designated streets. c. Design or redesign buildings to include architecturally interesting elements, pedestrian- friendly entrances, outdoor dining areas, transparent windows, or other means that emphasize human-scaled design features at the ground-floor level. 	<p>Consistent with Policy UD-C.7, both internal walkways and the sidewalk along College Avenue would be designed to provide opportunities for pedestrian activity. A combination of street trees and shrubs would be provided along the street to create a landscaped parkway and provide shade and visual interest adjacent to the sidewalks. The project's landscape design would establish a theme for the property that would complement the project architecture by providing a variety of trees, shrubs, vines, and ground cover to accent building architecture, where needed.</p>	<p>Yes</p>

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<i>Civic Architecture and Landmarks</i>		
<p><i>Policy UD-E.2.</i> Treat and locate civic architecture and landmark institutions prominently.</p> <ul style="list-style-type: none"> a. Where feasible, provide distinctive public open space, public art, greens, and/or plazas around civic buildings such as courthouses, libraries, post offices, and community centers to enhance the character of these civic and public buildings. Such civic and public buildings are widely used and should form the focal point for neighborhoods and communities. b. Incorporate sustainable building principles into building design (see also Conservation Element, Section A). c. Civic buildings at prominent locations, such as canyon rims, sites fronting open space, sites framing a public vista, and those affording a silhouette against the sky should exhibit notable architecture. d. Encourage innovative designs that civic and public buildings and landmarks from the surrounding neighborhood as a means of identifying their role as focal points for the community. e. Support the preservation of community landmarks. 	<p>Consistent with Policy UD-E.2, the church/sanctuary structure would be architecturally distinctive from the nearby single-family residences in the community. With its location adjacent to the College Avenue interchange, the structure would be a focal point for the community with its notable contemporary Spanish Colonial Revival-style theme featuring arched entrances and windows while also identifying its role as a place of worship through its rooftop features and signage. The project design would implement sustainable building features to minimize use of water, energy, and solid waste. Therefore, the project would be consistent with this policy from the General Plan.</p>	<p>Yes</p>

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Public Facilities, Services, and Safety Element		
<i>Evaluation of Growth, Facilities, and Services Goals</i>		
<p>Adequate public facilities that are available at the time of need and public facilities exactions that mitigate the facilities impacts that are attributable to new development.</p> <p><i>Policy PF-C.1.</i> Require development proposals to fully address impacts to public facilities and services.</p> <ol style="list-style-type: none"> Identify the demand for public facilities and services resulting from discretionary projects. Identify specific improvements and financing which would be provided by the project, including but not limited to sewer, water, storm drain, solid waste, fire, police, libraries, parks, open space, and transportation projects. Subject projects, as a condition of approval, to exactions that are reasonably related and in rough proportionality to the impacts resulting from the proposed development. Provide public facilities and services to assure that current levels of service are maintained or improved by new development within a reasonable time period. 	<p>The project would construct the necessary utilities to service the project, including water, sewer, and stormwater systems on-site to connect with existing off-site utilities within public roads. The sizing of the lines would be based on demand from the project. Levels of service would be maintained after the project construction is complete and fully occupied, as described in Section 7.1.13, <i>Utilities and Service Systems</i>.</p>	Yes
<i>Wastewater Goals</i>		
<p>Environmentally sound collection, treatment, reuse, disposal, and monitoring of wastewater and increased use of reclaimed water to supplement the region's limited water supply.</p> <p><i>Policy PF-F.6.</i> Coordinate land use planning and wastewater infrastructure planning to provide for future development and maintain adequate service levels.</p>	<p>The project would tie into the regional wastewater system and would comply with all applicable City standards concerning wastewater collection. As discussed in Section 7.1.13, <i>Utilities and Service Systems</i>, the existing collection system has capacity to accommodate wastewater from the project.</p>	Yes

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Stormwater Infrastructure Goals		
<p>Protection of beneficial water resources through pollution prevention and interception efforts; and a stormwater conveyance system that effectively reduces pollutants in urban runoff and stormwater to the maximum extent practicable.</p> <p><i>Policy PF-G.1.</i> Ensure that all stormwater conveyance systems, structures, and maintenance practices are consistent with federal Clean Water Act and California Regional Water Quality Control Board NPDES [National Pollutant Discharge Elimination System] Permit standards.</p> <p><i>Policy PF-G.2.</i> Install infrastructure that includes components to capture, minimize, and/or prevent pollutants in urban runoff from reaching receiving waters and potable water supplies.</p> <p><i>Policy PF-G.3.</i> Meet and preferably exceed regulatory mandates to protect water quality in a cost-effective manner monitored through performance measures.</p> <p><i>Policy PF-G.5.</i> Identify and implement BMPs for projects that repair, replace, extend or otherwise affect the stormwater conveyance system. These projects should also include design considerations for maintenance, inspection, and, as applicable, water quality monitoring.</p>	<p>All stormwater conveyance systems, structures, and maintenance practices would be consistent with the Clean Water Act and California Regional Water Quality Control Board National Pollutant Discharge Elimination System (NPDES) Permit standards and City's stormwater regulations to protect water quality, as discussed in Section 7.1.14, <i>Water Quality</i>. The project would, therefore, be consistent with Policies PF-G.1, PF-G.2, PF-G.3, and PF-G.5.</p>	<p>Yes</p>

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Waste Management Goals		
<p>Maximum diversion of materials from disposal through the reduction, reuse, and recycling of wastes to the highest and best use. <i>Policy PF-I.2.</i> Maximize waste reduction and diversion (see also Conservation Element, Policy CE.A.9).</p> <p>d. Maximize the separation of recyclable and compostable materials.</p> <p>f. Reduce and recycle Construction and Demolition (C&D) debris. Strive for recycling of 100 percent of inert C&D materials and a minimum of 50 percent by weight of all other material.</p> <p>g. Use recycled, composted, and post-consumer materials in manufacturing, construction, public facilities and in other identified uses whenever appropriate.</p> <p>h. Encourage the private sector to build a mixed construction and demolition waste materials recycling facility.</p>	<p>A WMP was prepared for the project that concluded the project would not have direct or cumulative impacts on solid waste management facilities (Appendix L). Implementation of the WMP would minimize waste deposited in landfills and the project would be consistent with Policies PF-I.2 and PF-I.5.</p>	<p>Yes</p>
Public Utility Goal		
<p>Public utilities services provided in the most cost-effective and environmentally sensitive way; and public utilities that sufficiently meet existing and future demand with facilities and maintenance practices that are sensible, efficient and well-integrated into the natural and urban landscape.</p> <p><i>Policy PF-M.3.</i> Integrate the design and siting of safe and efficient public utilities and associated facilities into the early stages of long-range planning and development process, especially in redevelopment/urban areas where land constraints exist.</p>	<p>The project would be consistent with this goal by relying on existing utility infrastructure in the project vicinity and relocating a public water line into College Avenue, as described in Sections 7.1.7, <i>Hydrology</i>, and 7.1.13, <i>Utilities and Service Systems</i>, that is designed in accordance with City engineering standards.</p>	<p>Yes</p>

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Seismic Safety Goals		
<p>Protection of public health and safety through abated structural hazards and mitigated risks posed by seismic conditions; and development that avoids inappropriate land uses in identified seismic risk areas.</p> <p><i>Policy PF-Q.1.</i> Protect public health and safety through the application of effective seismic, geologic and structural considerations.</p> <ul style="list-style-type: none"> a. Ensure that current and future community planning and other specific land use planning studies continue to include consideration of seismic and other geologic hazards. This information should be disclosed, when applicable, in the California Environmental Quality Act (CEQA) document accompanying a discretionary action. c. Require the submission of geologic and seismic reports, as well as soils engineering reports, in relation to applications for land development permits whenever seismic or geologic problems are suspected. g. Adhere to state laws pertaining to seismic and geologic hazards. 	<p>A geotechnical investigation was prepared for the project. There are no geotechnical hazards on site that would affect public health and safety, such as faults. As discussed in Section 7.1.4, <i>Geologic Conditions</i>, seismic risks would be less than significant considering the project would implement recommendations in the investigation and comply with CBC and other applicable City building standards. The project would not conflict with Policy PF-Q.1.</p>	<p>Yes</p>

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Conservation Element		
<i>Climate Change and Sustainable Development Goals</i>		
<p>To reduce the City's overall carbon dioxide footprint by promoting energy efficiency, alternative modes of transportation, sustainable planning and design, and waste management; to be prepared for, and able to adapt to adverse climate change impacts; and to become a city that is an international model of sustainable development and conservation.</p> <p><i>Policy CE-A.5.</i> Employ sustainable or "green" building techniques for the construction and operation of buildings.</p> <p>a. Develop and implement sustainable building standards for new and significant remodels of residential and commercial buildings to maximize energy efficiency, and to achieve overall net zero energy consumption by 2020 for new residential buildings and 2030 for new commercial buildings. This can be accomplished through factors including, but not limited to:</p> <ul style="list-style-type: none"> - Designing mechanical and electrical systems that achieve greater energy efficiency with currently available technology; - Minimizing energy use through innovative site design and building orientation that addresses factors such as sun-shade patterns, prevailing winds, landscape, and sun-screens; - Employing self-generation of energy using renewable technologies; - Combining energy efficient measures that have longer payback periods with measures that have shorter payback periods; - Reducing levels of non-essential lighting, heating, and cooling; and - Using energy efficient appliances and lighting. 	<p>The project would implement green building techniques in accordance with the CBC and the project's CAP Consistency Checklist and comply with the City's goals concerning sustainability contained in Policy CE-A.5.</p>	<p>Yes</p>

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<p><i>Policy CE-A.8.</i> Reduce construction and demolition waste in accordance with Public Facilities Element, Policy PF-I.2, or by renovating or adding on to existing buildings, rather than constructing new buildings.</p>	<p>In compliance with the City's waste management regulations and implementation of the waste reduction and diversion measures identified in the WMP, the project would be consistent with Policy CE-A.8, as discussed in Section 7.1.13, <i>Utilities and Service Systems</i>.</p>	<p>Yes</p>
<p><i>Policy CE-A.9.</i> Reuse building materials, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent possible, through factors including:</p> <ul style="list-style-type: none"> a. Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases; b. Using life cycle costing in decision-making for materials and construction techniques. Life cycle costing analyzes the costs and benefits over the life of a particular product, technology, or system; c. Removing code obstacles to using recycled materials in buildings and for construction; and d. Implementing effective economic incentives to recycle construction and demolition debris (see also Public Facilities Element Policy PF-I.2). 	<p>In compliance with the City's waste management regulations and implementation of the waste reduction and diversion measures identified in the WMP, the project would be consistent with Policy CE-A.9, as discussed in Section 7.1.13, <i>Utilities and Service Systems</i>.</p>	<p>Yes</p>
<p><i>Policy CE-A.10.</i> Include features in buildings to facilitate recycling of waste generated by building occupants and associated refuse storage areas:</p> <ul style="list-style-type: none"> a. Provide permanent, adequate, and convenient space for individual building occupants to collect refuse and recyclable material. b. Provide a recyclables collection area that serves the entire building or project. The space should allow for the separation, collection and storage of paper, glass, plastic, metals, yard waste and other materials as needed. 	<p>In compliance with the City's Refuse and Recyclable Material Storage Ordinance in the SDMC, the project would provide dedicated areas for the collection of refuse and recyclable materials and would ensure a collection service be provided for project operation. Therefore, the project would comply with Policy CE-A.10.</p>	<p>Yes</p>

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<p><i>Policy CE-A.11.</i> Implement sustainable landscape design and maintenance.</p> <ul style="list-style-type: none"> a. Use integrated pest management techniques, where feasible, to delay, reduce, or eliminate dependence on the use of pesticides, herbicides, and synthetic fertilizers. c. Encourage composting efforts through education, incentives, and other activities. Decrease the amount of impervious surfaces in developments, especially where public places, plazas, and amenities are proposed to serve as recreation opportunities (see also Recreation Element, Policies RE-A.6 and A.7). d. Strategically plant deciduous shade trees, evergreen trees, and drought tolerant native vegetation, as appropriate, to contribute to sustainable development goals. e. Reduce use of lawn types that require high levels of irrigation. f. Strive to incorporate existing mature trees and native vegetation into site designs. g. Minimize the use of landscape equipment powered by fossil fuels. h. Implement water conservation measures in site/building design and landscaping. i. Encourage the use of high-efficiency irrigation technology, and recycled site water to reduce the use of potable water for irrigation. Use recycled water to meet the needs of development projects to the maximum extent feasible (see Policy CE-A.12). 	<p>With regard to Policy CE-A.11, all landscape and irrigation would conform to the standards set forth in the Landscape Regulations of the LDC and Landscape Standards Manual and other applicable City and regional standards. Landscaping would include water conservation measures through irrigation management (e.g., use of pressure/moisture sensors and shut-off valves).</p> <p>The proposed landscape plan (see Section 3.2.3) features the use of native/naturalized and/or drought-tolerant plant material, whenever possible. No invasive or potentially invasive species would be used. In general, the landscape improvements along College Avenue would create a 14- to 16-foot-wide parkway featuring a 12-foot-wide shared sidewalk and street side canopy plantings and ground covers from the property line north to the private driveway. North of the private driveway, a 10 to 12-foot-wide parkway would be installed consisting of street side canopy plantings and a 5-foot-wide sidewalk. Entry monumentation and landscape treatments would be installed on site at the southeast corner near the driveway entrance.</p> <p>Plant material would be used throughout the site to help define spaces, encourage circulation paths, highlight entry points, and screen retaining walls. On site landscaping would include canopy trees and raised box plantings on the upper deck of the parking structure and in the parking areas, accent planting zones and graded slope plantings. In addition, plant material would be placed within the three stormwater biofiltration basins to provide stormwater management by collecting and treating runoff prior to its release off site. These landscaping features would be in conformance with Policy CE-A.11.</p>	<p>Yes</p>

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<p><i>Policy CE-A.12.</i> Reduce the San Diego Urban Heat Island, through actions such as:</p> <ul style="list-style-type: none"> a. Using cool roofing materials, such as reflective, low heat retention tiles, membranes and coatings, or vegetated eco-roofs to reduce heat build-up; b. Planting trees and other vegetation, to provide shade and cool air temperatures. In particular, properly position trees to shade buildings, air conditioning units, and parking lots; and c. Reducing heat build-up in parking lots through increased shading or use of cool paving materials as feasible (see also Urban Design Element, Policy UD-A.12). 	<p>The project includes design features to minimize potential “urban heat island effects,” including the use of light-colored roofs and paving materials of concrete or masonry pavers and provision of tree-lined, shaded streets. Covered walkways and building overhangs would provide shade in these pedestrian use areas. Implementation of these project design features as part of the approved exhibits would be in conformance with Policy CE-A.12.</p>	<p>Yes</p>
Urban Runoff Management Goals		
<p>Protection and restoration of water bodies, including reservoirs, coastal waters, creeks, bays, and wetlands; and preservation of natural attributes of both the floodplain and floodway without endangering life and property.</p> <p><i>Policy CE-E.2.</i> Apply water quality protection measures to land development projects early in the process-during project design, permitting, construction, and operations-in order to minimize the quantity of runoff generated on-site, the disruption of natural water flows and the contamination of stormwater runoff.</p> <ul style="list-style-type: none"> a. Increase on-site infiltration, and preserve, restore or incorporate natural drainage systems into site design. b. Direct concentrated drainage flows away from the MHPA and open space areas. If not possible, drainage should be directed into sedimentation basins, grassy swales or mechanical trapping devices prior to draining into the MHPA or open space areas. c. Reduce the amount of impervious surfaces through selection of materials, site planning, and street design where possible. 	<p>To compensate for a minor increase in runoff and comply with the current municipal separate storm sewer system (MS-4) permit and City’s Stormwater Manual, the project includes flow-through biofiltration planters to collect and treat runoff before it is discharged to the off-site stormwater system. As discussed in Section 7.1.7, <i>Hydrology</i>, and Section 7.1.14, <i>Water Quality</i>, the project would comply with drainage and water quality requirements, including those of the City and Regional Water Quality Control Board. Compliance with the water quality standards is ensured through permit conditions provided by Land Development Review (LDR) Engineering. Implementation of the recommendations in the project’s Preliminary Drainage Report (Appendix H) and Preliminary Stormwater Quality Management Plan (Appendix I) would be in conformance with Policies CE-E.2, CE-E.3, and CE-E.6.</p>	<p>Yes</p>

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<p>d. Increase the use of vegetation in drainage design.</p> <p>e. Maintain landscape design standards that minimize the use of pesticides and herbicides.</p> <p>f. Avoid development of areas particularly susceptible to erosion and sediment loss (e.g., steep slopes) and, where impacts are unavoidable, enforce regulations that minimize their impacts.</p> <p>g. Apply land use, site development, and zoning regulations that limit impacts on, and protect the natural integrity of topography, drainage systems, and water bodies.</p> <p>h. Enforce maintenance requirements in development permit conditions.</p> <p><i>Policy CE-E.3.</i> Require contractors to comply with accepted stormwater pollution prevention planning practices for all projects.</p> <p>a. Minimize the amount of graded land surface exposed to erosion and enforce erosion control ordinances.</p> <p>b. Continue routine inspection practices to check for proper erosion control methods and housekeeping practices during construction.</p> <p><i>Policy CE-E.6.</i> Continue to encourage "Pollution Control" measures to promote the proper collection and disposal of pollutants at the source, rather than allowing them to enter the storm drain system.</p> <p>a. Promote the provision of used oil recycling and/or hazardous waste recycling facilities and drop-off locations.</p> <p>b. Review plans for new development and redevelopment for connections to the storm drain system.</p> <p>c. Follow up on complaints of illegal discharges and accidental spills to storm drains, waterways, and canyons.</p>		

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<i>Sustainable Energy Goal</i>		
<p>An increase in local energy independence through conservation, efficient community design, reduced consumption, and efficient production and development of energy supplies that are diverse, efficient, environmentally-sound, sustainable, and reliable.</p> <p><i>Policy CE-I.4.</i> Maintain and promote water conservation and waste diversion programs to conserve energy.</p>	<p>The project would adhere to CBC and CAP requirements for water-conserving plumbing. All landscape and irrigation would conform to the Landscape Regulations and Landscape Standards of the LDC and other applicable City and regional standards.</p> <p>Drought-tolerant plant materials would be incorporated into the landscape plan. Irrigation systems for all landscaped areas would use controllers that respond to local climactic conditions and monitor potential breakages to prevent wasted water. Therefore, the project would be consistent with Policy CE-1.4.</p>	Yes
<i>Urban Forestry Goal</i>		
<p>Protection and expansion of a sustainable urban forest.</p> <p><i>Policy CE-J.4.</i> Continue to require the planting of trees through the development permit process.</p> <p>a. Consider tree planting as mitigation for air pollution emissions, stormwater runoff, and other environmental impacts as appropriate.</p>	<p>The project includes landscaping that would expand “urban forest” goals through the provision of various tree types that would be maintained through maturity, consistent with Policy CE-J.4.</p>	Yes

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Noise Element		
Noise and Land Use Compatibility Goal		
<p>Consider existing and future noise levels when making land use planning decisions to minimize people's exposure to excessive noise.</p> <p><i>Policy NE-A.2.</i> Assure the appropriateness of proposed developments relative to existing and future noise levels by consulting the guidelines for noise-compatible land use (shown on Table NE-3) to minimize the effects on noise-sensitive land uses.</p> <p><i>Policy NE-A.4.</i> Require an acoustical study consistent with Acoustical Study Guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the "compatible" noise level thresholds as indicated on the Land Use – Noise Compatibility Guidelines (Table NE-3), so that noise mitigation measures.</p> <p><i>Policy NE-A.5.</i> Prepare noise studies to address existing and future noise levels from noise sources that are specific to a community when updating community plans.</p>	<p>A noise study was conducted on the project, the results of which are presented in Section 5.4, <i>Noise</i>, and in this section under Issue 5. No land use-noise compatibility issues were identified. The project would be consistent with Policies NE-A.2 and NE-A.4.</p>	<p>Yes</p>
<p><i>Policy NE-B.1.</i> Encourage noise-compatible land uses and site planning adjoining existing and future highways and freeways.</p> <p><i>Policy NE-B.2.</i> Consider traffic calming design, traffic control measures, and low-noise pavement surfaces that minimize motor vehicle traffic noise.</p> <p><i>Policy NE-B.3.</i> Require noise reducing site design, and/or traffic control measures for new development in areas of high noise to ensure that the mitigated levels meet acceptable decibel limits.</p>	<p>As addressed in this section under Issue 5 and in Section 5.4, <i>Noise</i>, the project would not result in the exposure of people to current or future transportation noise levels that exceed City significance standards. Less-than-significant noise impacts from the operation of the parking structure and surface parking would occur. The project would be consistent with Policies NE-B.1 through NE-B.3.</p>	<p>Yes</p>

Table 5.1-2
NAVAJO COMMUNITY PLAN GOALS AND RECOMMENDATIONS CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
Principal Objective		
Maintain and Enhance the Quality of Existing Residences and Encourage the Development of a Variety of New Housing Types with Dwelling Unit Densities Primarily in the Low to Low-Medium Density Range as shown.	The project would involve the construction of a non-residential use on a residentially designated site. It does not propose new housing. The site and architectural design incorporate careful planning and sensitive development features which create a well-defined, balanced and visually coherent design that would maintain the quality of the surrounding residential neighborhood. The project would be consistent with this objective from the Community Plan.	Yes
Residential Element		
Promote a healthy environment by careful planning and sensitive development of well- defined, balanced and distinct communities which encompass a variety of residential density patterns and housing types.	The project would involve the construction of a non-residential use on a residentially designated site. The site and architectural design incorporate careful planning and sensitive development features which create a well-defined, balanced and visually compatible design that would maintain the quality of the surrounding residential neighborhood. Since the proposed church would not be inconsistent with the character of the neighborhood, as described in Section 5.5, <i>Visual Effects and Neighborhood Character</i> , the project would be consistent with this goal of the Community Plan.	Yes
Foster techniques of land development that will encourage imagination and variety in building site layouts, housing types, and costs, and that will capitalize on the unique topographic assets of the community. All housing developments within the study area should relate to existing topography in order to minimize grading and preserve the natural terrain of the area. The use of retaining walls, terraces, split level or cantilevered houses should be considered in steep terrain.	The proposed church/sanctuary structure would be situated in the topographic low point of the site near the College Avenue off-ramp from I-8 and setback from the adjacent, lower stature residential and commercial structures to the east and north, as shown in cross-sections contained in Chapter 3, <i>Project Description</i> , and Section 5.5, <i>Visual Effects and Neighborhood Character</i> . The parking structure would be recessed into the terrain such that its upper parking deck would be slightly below College Avenue and the surface parking lot would meet surrounding grades. The building placement and setbacks defined in the project site plan would suppress the proposed structures. Landscaping, such as trees and vining species in raised planter beds, would be installed throughout the property, including the upper parking deck and	Yes

Table 5.1-2
NAVAJO COMMUNITY PLAN GOALS AND RECOMMENDATIONS CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
	along the façade of the parking structure, to soften and screen views. In addition, planting areas, with densely spaced trees and shrubs would be provided between parking areas and site perimeters to further soften views of the project. Therefore, the proposed grading, siting, landscaping, building articulation, roof treatments and other architectural design features would collectively provide visual interest and break up the massing of the structures such that the project would be consistent with this goal from the Community Plan.	
Encourage the design of residential areas so as to prevent the encroachment of incompatible uses and minimize conflict (e.g., traffic noise) with more intensive nonresidential uses.	The proposed church/sanctuary and associated parking facilities have been sited to take advantage of the topographic differences that currently exist on site by placing the most intensive activities associated with the daily operations in the southwestern corner of the property in the lowest topographic area of the site below the adjacent residences to minimize the potential for noise. Primary vehicular access to the project and the parking structure would be via a full access driveway connected to a new signalized intersection along College Avenue to minimize traffic conflicts. Architectural articulation and features (i.e., arches) have been integrated into the design to provide visual interest. Extensive landscaping, including screening along the common property line with the nearby residential yards, is proposed to conceal and soften views of facilities, walls and rooftops, as described in Section 5.5, <i>Visual Effects and Neighborhood Character</i> . The project design would be consistent with this policy.	Yes

Table 5.1-2
NAVAJO COMMUNITY PLAN GOALS AND RECOMMENDATIONS CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
Within each new development and where possible in developed areas, plazas, squares, and other similar open space areas should be created. Emphasis should be placed on developing interconnected bikeways and walkways separated from auto traffic as part of the internal circulation system within the study area.	The proposed church/sanctuary would include an entry plaza, architectural design features and landscape treatments that would produce a positive visual appearance from public vantage points that surround the site. Primary vehicular access to the project and the parking structure would be via a full access driveway connected to a new signalized intersection along College Avenue. Off-site improvements to the new College Avenue intersection would include creating a break and narrowing of the existing raised median, constructing a new southbound left-turn lane, striping a northbound right-turn lane and installing a crosswalk. The private driveway connection at College Avenue would descend to an entry plaza between the parking structure and the church/sanctuary building. A second right turn in/out driveway would be installed at the northern project boundary. These project features would be consistent with this goal.	Yes
Parking and storage areas should be screened from the street and other public areas.	The site plan and landscape plan in Chapter 3, <i>Project Description</i> , and visual simulations in Section 5.5, <i>Visual Effects and Neighborhood Character</i> , show that the parking areas would be heavily screened from public vantage points along College Avenue. These project features would be consistent with the goal.	Yes
Adequate off-street parking and storage must be provided and screened from living areas and public areas. Street trees and drought tolerant landscaping should be used in level terrain to add interest to hide parking and to separate functions. Non-contiguous sidewalks must be provided even around off-street parking and storage areas.	The project would exceed the parking requirements in the SDMC, as described in Chapter 3, <i>Project Description</i> . The site plan and landscape plan in Chapter 3, <i>Project Description</i> , and visual simulations in Section 5.5, <i>Visual Effects and Neighborhood Character</i> , show that the parking areas would be heavily screened from public vantage points along College Avenue. A landscaped parkway and non-contiguous sidewalk would be installed along College Avenue along the project frontage. All storage areas would be either in the parking structure or concealed from view. These project features would be consistent with the goal.	Yes

Table 5.1-2
NAVAJO COMMUNITY PLAN GOALS AND RECOMMENDATIONS CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
<p>[Residential] Site Design</p> <p>If earth moving is necessary, re-contour rather than cut and fill. If a new form must be given to the land, the final form should have a strong, smoothly flowing character typical of the existing hills. The basic character of the original site should provide the theme with adjustments to make the slopes gentle. Particular attention should be paid to the transition areas where the existing terrain stops and earthwork begins. Additional shaping in some areas may be necessary due to the unique subsoil and groundwater conditions present.</p>	<p>The project proposes both cut and fill grading to stabilize the unconsolidated fill from previous site grading, to create usable building pads and parking areas, and to recess the parking structure into the terrain. Grading transitions that match the existing sloping terrain would be constructed where the project interfaces with off-site slopes. The basic character of the site, which has the lowest elevations in the south and highest elevations in the north, would be retained upon project implementation as shown in the project grading plan (refer to Figure 3-7 in Chapter 3). The project would be consistent with the goal.</p>	<p>Yes</p>
<p>Imaginative and innovative building techniques should be encouraged to create buildings</p>	<p>The church/sanctuary building is designed in a contemporary Spanish Colonial Revival-style theme featuring arched entrances and windows along its painted concrete tilt-up facades, with accents of wood fascia and terra-cotta-colored tile roofing materials. The glazing for each window would be tinted bronze in color. The proposed grading, siting, landscaping, building articulation, roof treatments and other architectural design features would collectively provide visual interest. The project would be consistent with the policy.</p>	<p>Yes</p>
<p>Residential Street Design</p> <p>Provide the maximum street tree planting. One principal characteristic of memorable streets throughout the world is their tree planting. The finest examples have mature specimens that arch across the street creating a green canopy. From an urban design standpoint, a various tree planting program is the most important single thing that the City can do. Trees should be spaced close enough together to create an effect of enclosure and to provide protection of trees from hot drying winds and sun scald.</p>	<p>Landscape improvements along College Avenue would remove the existing contiguous sidewalk and create a 10- to 16-foot-wide landscaped parkway with non-contiguous sidewalk featuring street side canopy plantings and ground covers. The project design would exceed the landscape requirements in the SDMC, as described in Chapter 3, <i>Project Description</i>. The project would be consistent with the policy.</p>	<p>Yes</p>

Table 5.1-2
NAVAJO COMMUNITY PLAN GOALS AND RECOMMENDATIONS CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
Community Environment		
Encourage an overall quality of design by using materials, color and texture to give identity and focus to groups of structures within the urban landscape.	The church/sanctuary and parking structure have been designed using similar architectural styling, building materials and colors, as well as landscaping, to create a comprehensively designed project, consistent with this policy.	Yes
<u>Buildings – Structures</u> <ul style="list-style-type: none"> • Create, through design, harmony between natural features and urbanized areas and activities. • Encourage an orderly transition of height, density, scale and arrangement of buildings to preserve the identity of each element as well as the cohesion of the whole. • Promote the coordination of building groupings to foster neighborhood and community identity and unity. • Encourage an overall quality of design by using materials, color and texture to give identity and focus to groups of structures within the urban landscape. • Develop points of visual relief in the urban landscape through the use of open spaces and landscaping, building setbacks, building materials, location of public facilities, and street and right-of-way design and maintenance. 	The project incorporates architectural design features and landscape treatments that complement the surrounding natural and urban setting. The proposed grading, siting, landscaping, building articulation, roof treatments and other architectural design features would collectively create design harmony with and transitions between the project and its surroundings and create visual interest by breaking up the massing of the structures such that the project would not exceed the bulk and scale of existing patterns of development by a substantial margin, as detailed in Section 5.5, <i>Visual Effects and Neighborhood Character</i> . The architectural materials, color and texture would create a comprehensive design theme anchored in contemporary Spanish Colonial Revival styling. Visual relief would be provided through the use of enhanced landscape treatments around the perimeter of the property, including along College Avenue. Refer to the visual simulations in Section 5.5 for images illustrating the features of the project. The project features would be consistent with this goal from the Community Plan.	Yes

Table 5.1-2
NAVAJO COMMUNITY PLAN GOALS AND RECOMMENDATIONS CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
<p><u>Landscaping</u></p> <ul style="list-style-type: none"> • Use trees and shrubbery along heavily traveled streets to help lessen effects of traffic noise. • Establish financing programs, such as assessment districts, to provide for and maintain landscaping in the public right-of-way for major streets within the community. • The following streets should receive first priority for such right-of-way improvements: Navajo Road, Mission Gorge Road, College Avenue and Waring Road. These improvements should include the planting of street trees as well as landscaping of the center median. 	<p>Landscape improvements along College Avenue would remove the existing contiguous sidewalk and create a 10- to 16-foot-wide landscaped parkway with non-contiguous sidewalk featuring street side canopy trees and ground covers. The project would install 32 new street trees within the College Avenue right-of-way where none currently exist. Refer to Figure 3-6 and the visual simulations in Section 5.5, <i>Visual Effects and Neighborhood Character</i>.</p>	<p>Yes</p>
<p><u>Natural</u></p> <ul style="list-style-type: none"> • Utilize natural elements as points of visual relief in the urbanized areas. • Establish and maintain an open space system to conserve natural resources, preserve scenic beauty, and define urban form. • Create and preserve open space in and around built-up areas to aid in lessening the effects of high noise levels. • Strengthen environmental pollution control measures. Support research into causes and prevention of environmental pollution. • Prevent deterioration of natural watershed areas. 	<p>As discussed in Section 5.5, <i>Visual Effects and Neighborhood Character</i>, the project would result in a less-than-significant impact related to visual and scenic resources. There are no view corridors designated in the Community Plan in the project area. The site is designated and zoned for residential development and is not designated for open space or preservation. The project would have less-than-significant operational noise impacts on the community, as discussed in Section 5.4, <i>Noise</i>. No deterioration of the natural watershed would occur due to the installation of best management practices (BMPs), such as biofiltration basins, that would detain and treat all runoff occurring on the project site. The project would be consistent with this goal.</p>	<p>Yes</p>

Table 5.1-2
NAVAJO COMMUNITY PLAN GOALS AND RECOMMENDATIONS CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
Circulation Element		
Develop a balanced transportation system that adequately links the Navajo area to nearby communities as well as regional facilities.	According to the Local Mobility Analysis (Appendix J) prepared for the project, with the proposed traffic signal, median changes, sidewalk and bike lane improvements in place, project traffic would not result in a conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, as discussed in Section 7.1.12, <i>Transportation</i> . The project would be consistent with this goal.	Yes
Strive to separate automobile, pedestrian and bicycle conflicts and, where safe and practical, provide specially designated bikeways to accommodate the increased demand for this mode of travel.	To separate the pedestrian and bicycle movements from vehicular travel lanes along the project's College Avenue frontage, a 12-foot shared (i.e., pedestrians and bicycles) contiguous sidewalk would be installed south of the project driveway toward the I-8 interchange, while north of the project driveway a 10- to 12-foot-wide parkway would be installed, consisting of street side canopy, shade-producing street trees and a 5-foot-wide sidewalk. Stairs and a ramp would be extended on-site from the sidewalks to link College Avenue to the church/sanctuary building and entry plaza. Bike lane signage and striping would be installed along the east side of College Avenue to accommodate multi-modal traffic. The project would be consistent with this goal.	Yes
<p>Widening and realignment frequently destroys the visual character and identity of streets by the removal of mature trees, other landscaping, and median strips. The approach to street widening and realignment should be more sensitive to the character of the street and the quality of adjacent development.</p> <p>A coordinated system of variation in the use and placement of street trees, lighting, and other details could give streets better visual continuity and provide differentiation between through streets and local streets to aid driver orientation and traffic flow. The variations could include size, spacing and species of street trees and other landscaping, and intensity, spacing, and design of lighting fixtures.</p>	The project would not widen or realign College Avenue. Instead, it would create parkways and a short median break and narrowing of the existing raised median to construct a new southbound left-turn lane at the project driveway. Landscape improvements along College Avenue would also remove the existing contiguous sidewalk and create a 10- to 16-foot-wide landscaped parkway with non-contiguous sidewalk featuring street side canopy trees and ground covers north and south of the project entrance. Consistent with this policy, no street trees would be removed, and 32 new street trees would be installed within the College Avenue right-of-way where none currently exist. As described in Chapter 3, <i>Project Description</i> , plant material would be used throughout the site to	Yes

Table 5.1-2
NAVAJO COMMUNITY PLAN GOALS AND RECOMMENDATIONS CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
<p>For example, major streets might have tall, widely spaced street trees; bright, closely spaced street lights; and large street signs. Design walkways and parking facilities to minimize danger to pedestrians. Pedestrian walkways should be sharply separated from traffic areas and set apart where possible to provide a separate circulation system. Where necessary and practical, the separation should include landscaping and other barriers.</p> <p>Both public and private efforts in the installation and maintenance of landscaping should be increased. In residential areas, side yards and setbacks provide the best opportunities for landscaping visible in public areas. If no such space exists, then trees should be placed in the sidewalk area, preferably in the ground rather than in containers. Care should be taken to select species of trees suitable to each location.</p>	<p>help define spaces, encourage circulation paths, highlight entry points, provide visual relief, and screen retaining walls and off-site properties. On-site landscaping would include canopy shade trees and raised box plantings on the upper deck of the parking structure, shade-producing trees in the parking areas, accent planting zones featuring palms and focal point species, and ground cover, shrubs and trees would be used for slope plantings. The landscape plans illustrated in Figure 3-6 of this report would comply with the City's Landscape Design Manual and enhance the streetscape, improve safety for pedestrians and bicycles, and soften views into the property. The project would be consistent with this goal.</p>	

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5.2 Biological Resources

This section of the Environmental Impact Report (EIR) is based on a number of biological surveys and related investigations including the Biological Technical Report (Alden Environmental Inc. 2020) contained in **Appendix C, Biological Technical Report**, to this EIR.

5.2.1 Existing Conditions

5.2.1.1 Vegetation Communities/Land Cover Types

Six upland vegetation communities occur on the project site (**Figure 5.2-1, Vegetation and Sensitive Species/Impacts**). **Table 5.2-1, Existing Vegetation Communities/Land Cover Types**, presents a list of these communities/types and their respective acreage totals. There are no wetland or riparian communities present on the project site. One land cover type, developed, occurs in the off-site improvement area associated with the College Avenue intersection improvements and the off-site sewer connection through developed areas to its connection point with an existing sewer main in Marne Avenue.

**Table 5.2-1
EXISTING VEGETATION COMMUNITIES/LAND COVER TYPES**

Vegetation Community/Land Cover Type^a	On Site (acres)^b
Upland	
Diegan coastal sage scrub (Tier II)	2.3
Diegan coastal sage scrub-disturbed (Tier II)	0.9
Non-native grassland (Tier IIIB)	0.8
Other Upland (Tier IV)	
Disturbed habitat	1.2
Eucalyptus woodland	0.3
Ornamental	0.6
No Tier Land Cover	
Developed	—
Total	6.0

Notes:

Totals reflects rounding.

^a Upland vegetation communities are divided into five tiers of sensitivity (the first includes the most sensitive, the fifth the least sensitive) based on rarity and ecological importance (City of San Diego 2018a). Tier I includes rare upland habitats. Tier II includes uncommon upland habitats. Tiers IIIA and IIIB include common upland habitats. Tier IV includes other upland habitats.

^b Off-site utility improvements related to the project are not included in the table but would occur within developed areas. No vegetation communities are present in the off-site improvement areas.

The following sections describe each vegetation community/land cover type on the project site. The acreages are provided along with the upland habitat tiers (City of San Diego 2018a), where

applicable. Upland vegetation communities are divided into five tiers of habitat sensitivity (the first includes the most sensitive, the fifth the least sensitive) based on rarity and ecological importance (City of San Diego 2018a). Tier I includes rare upland habitats. Tier II includes uncommon upland habitats. Tiers IIIA and IIIB include common upland habitats. Tier IV includes other upland habitats.

Diegan Coastal Sage Scrub (including -disturbed)

Coastal sage scrub is one of two major shrub types that occur in California. This community occupies xeric sites characterized by shallow soils. Coastal sage scrub is dominated by subshrubs whose leaves abscise during drought. This adaptation allows the plant species to better withstand the prolonged dry period in the summer and fall. Coastal sage scrub species have relatively shallow root systems and open canopies, which may allow for the occurrence of a substantial herbaceous component. Four floristic associations are recognized within the coastal sage scrub plant formation, and these occur in distinct geographic areas along the California coast with the Diegan association, which occurs on the project site, occupying the area from Orange County to northwestern coastal Baja California, Mexico (O'Leary 1990).

Diegan coastal sage scrub on the project site contains a diverse suite of plant species including California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), lemonadeberry (*Rhus integrifolia*), and laurel sumac (*Malosma laurina*). This community on site also supports small patches of mule fat (*Baccharis salicifolia*) in an entirely upland situation. Diegan coastal sage scrub-disturbed contains many of the same shrub species as the undisturbed community but is sparser, has a higher proportion of non-native species (principally non-native grasses), and shows signs of previous disturbance. Diegan coastal sage scrub (including -disturbed) is a Tier II (uncommon upland) habitat (City of San Diego 2018a). Approximately 3.2 acres of this community occurs on the project site.

Non-Native Grassland

Non-native grassland is comprised of a dense to sparse cover of non-native grasses, sometimes associated with species of showy-flowered, native, annual forbs (Holland 1986). This community characteristically occurs on gradual slopes with deep, fine-textured, usually clay soils. Characteristic species on the project site include oats (*Avena* spp.), filaree (*Erodium* spp.), red brome (*Bromus madritensis* ssp. *rubens*), and ripgut grass (*Bromus diandrus*). Most of the annual, introduced species that comprise the majority of species and biomass within non-native grassland originated from the Mediterranean region, an area with a long history of agriculture and a climate similar to California. These two factors, in addition to intensive grazing and agricultural practices in conjunction with droughts, contributed to the successful invasion and establishment of these species and the replacement of native grasses with annual-dominated, non-native grassland (Jackson 1985). Non-native grassland is a Tier IIIB (common upland) habitat (City of San Diego 2018a). Approximately 0.8 acres of non-native grassland occurs on the project site.

Disturbed Habitat

Disturbed habitat includes land cleared of vegetation, land containing a preponderance of non-native plant species, or land showing signs of past or present usage that removes its capability of providing viable wildlife habitat. Such areas include dirt roads, graded areas, and dump sites where

no native or naturalized species remain. Approximately 1.2 acres of disturbed habitat occurs on the project site. Disturbed habitat is a Tier IV (other upland) habitat (City of San Diego 2018a).

Eucalyptus Woodland

Eucalyptus woodland is dominated by eucalyptus (*Eucalyptus* spp.), an introduced genus that has been planted for wind blocking, ornamental, or hardwood production purposes. The understory within well-established groves is usually very sparse due to the closed canopy and allelopathic nature of the abundant leaf and bark litter. The sparse understory offers only limited wildlife habitat; however, as a wildlife habitat, these woodlands can provide nesting sites for raptors. During winter migrations, a variety of warblers may be found feeding on the insects that are attracted to the eucalyptus flowers. Approximately 0.3 acres of eucalyptus woodland occurs on the project site. Eucalyptus woodland is a Tier IV (other upland) habitat (City of San Diego 2018a).

Ornamental

Ornamental is where non-native landscaping has been planted. Ornamental landscaping occurs on approximately 0.6 acres of the project site and includes species such as pine (*Pinus* sp.) and pepper (*Schinus* spp.) trees. Ornamental is a Tier IV (other upland) habitat (City San Diego 2018a).

Developed

Developed land occurs in the off-site utility improvement areas, including within College Avenue and through developed areas to connect with the existing sewer main in Marne Avenue.

5.2.1.2 Jurisdictional Areas

Jurisdictional areas include waters of the U.S. under the jurisdiction of the U.S. Army Corps of Engineers, waters of the State under the jurisdiction of the California Department of Fish and Wildlife (CDFW), and City Wetlands. There are no jurisdictional areas on the project site.

5.2.1.3 Sensitive Vegetation Communities

Sensitive vegetation communities are considered rare within the region or sensitive by CDFW (Holland 1986) and/or the City (City of San Diego 2018a). These communities in any form (including, for example, -disturbed) are considered sensitive because they have been historically depleted, are naturally uncommon, or support sensitive species. The project site supports two sensitive vegetation communities: Diegan coastal sage scrub (including -disturbed; Tier II habitat) and non-native grassland (Tier IIIB habitat).

5.2.1.4 Sensitive Plant Species

Sensitive plant species are those that are federal, state, or California Native Plant Society (CNPS) rare, threatened, or endangered; Multiple Species Conservation Program (MSCP) Narrow Endemics; or MSCP-Covered Species. A species may also be considered sensitive if it is included in the CNPS Inventory of Rare and Endangered Plants.

Observed

Three sensitive plant species were observed on the project site (Figure 5.2-1). They include graceful tarplant (*Holocarpha virgata* ssp. *elongata*), San Diego County sunflower (*Bahiopsis laciniata*), and ashy spike-moss (*Selaginella cinerascens*), as described below. Sensitivity codes are explained in Appendix C of EIR Appendix C.

- Graceful tarplant (*Holocarpha virgata* ssp. *elongata*)
 - Sensitivity: CNPS Rare Plant Rank 4.2 (a CNPS watch list species)
 - Distribution: Orange, Riverside, and San Diego counties
 - Habitat(s): Chaparral, valley grassland, foothill woodland, coastal sage scrub
 - Presence on site: Scattered individuals were found within non-native grassland on the project site
- San Diego County sunflower (*Bahiopsis laciniata*)
 - Sensitivity: CNPS Rare Plant Rank 4.2 (a CNPS watch list species)
 - Distribution: San Diego and Orange counties; Baja California, Mexico.
 - Habitat(s): Diegan coastal sage scrub is the habitat of this perennial shrub
 - Presence on site: Eight individuals of this species were found in Diegan coastal sage scrub-disturbed on the project site.
- Ashy spike moss (*Selaginella cinerascens*)
 - Sensitivity: CNPS Rare Plant Rank 4.1 (a CNPS watch list species)
 - Distribution: Orange and San Diego counties; northwestern Baja California, Mexico.
 - Habitat(s): Open areas on flat mesas in coastal sage scrub and chaparral
 - Presence on site: A small patch of this species was found in Diegan coastal sage scrub on the project site

Not Observed

Sensitive plant species that were not observed but that may have potential to occur on the project site are listed in **Table 5.2-2, Sensitive Plant Species and Their Potential to Occur**. **Table 5.2-3, MSCP Narrow Endemic Plant Species Potential to Occur**, specifically addresses the potential for all City Narrow Endemic plant species to occur on the project site.

Table 5.2-2
SENSITIVE PLANT SPECIES AND THEIR POTENTIAL TO OCCUR

Species	Listing or Sensitivity: ^a Federal/State CNPS City	Habitat(s)	Bloom Period	Potential to Occur
California adolphia (<i>Adolphia californica</i>)	—/— CNPS Rare Plant Rank 2B.1 —	Occurs in chaparral, valley grassland, and coastal sage scrub in Los Angeles and San Diego counties.	December to May	None. A perennial shrub that would have been observed if present.
San Diego goldenstar (<i>Bloomeria clevelandii</i>)	—/— CNPS Rare Plant Rank 1B.1 Covered Species	Found on clay soils in chaparral, coastal scrub, vernal pools, and valley and foothill grassland in Riverside and San Diego counties.	April to May	Very low. Suitable habitat and soils not present.
Palmer's goldenbush (<i>Ericameria palmeri</i> var. <i>palmeri</i>)	—/— CNPS Rare Plant Rank 1B.1 Covered Species	Associated with coastal sage scrub and chaparral habitats.	September to November	None. A perennial, evergreen shrub that would have been observed if present.
San Diego barrel cactus (<i>Ferocactus viridescens</i>)	—/— CNPS Rare Plant Rank 2B.1 Covered Species	Associated with coastal sage scrub and chaparral habitats.	May to June	None. A perennial stem succulent that would have been observed if present.
Robinson's pepper-grass (<i>Lepidium virginicum</i> var. <i>robinsonii</i>)	—/— CNPS Rare Plant Rank 4.3 —	Associated with coastal sage scrub and chaparral habitats.	January to July	Low. Survey was conducted at the middle of the bloom period; therefore, it is expected it would have been found if present.
Golden-rayed pentachaeta (<i>Pentachaeta aurea</i> ssp. <i>aurea</i>)	—/— CNPS Rare Plant Rank 4.2 —	Found in mesic montane grasslands and sage scrub in Riverside, San Bernardino, Orange, Los Angeles, and San Diego counties; Baja California, Mexico.	March to July	Low. Survey was conducted during the bloom period; therefore, it is expected it would have been found if present.

Table 5.2-2
SENSITIVE PLANT SPECIES AND THEIR POTENTIAL TO OCCUR

Species	Listing or Sensitivity:^a Federal/State CNPS City	Habitat(s)	Bloom Period	Potential to Occur
Purple stemodia (<i>Stemodia durantifolia</i>)	—/— CNPS Rare Plant Rank 2B.1 —	Associated with wetland/riparian habitats.	January to December	None. Suitable habitat not present.
Oil neststraw (<i>Stylocline citroleum</i>)	—/— CNPS Rare Plant Rank 1B.1 —	Associated with coastal sage scrub, chenopod scrub, and grasslands in clay soils.	March to April	Very low. Soils on site not suitable.

Source: Alden Environmental 2020

Note:

^a See Appendix C of EIR Appendix C for an explanation of listing or sensitivity codes.

TABLE 5.2-3
MSCP NARROW ENDEMIC PLANT SPECIES POTENTIAL TO OCCUR

Species	Listing or Sensitivity: ^a Federal/State CNPS	Habitat(s)	Bloom Period	Potential to Occur
San Diego thornmint (<i>Acanthomintha ilicifolia</i>)	FT/SE CNPS Rare Plant Rank 1B.1	Occurs on clay lenses in grassy openings in chaparral or sage scrub. Prefers friable or broken, clay soils. Range limited to coastal areas of San Diego County and Baja California, Mexico.	April to June	Very low. Soils not suitable.
Shaw's agave (<i>Agave shawii</i>)	—/— CNPS Rare Plant Rank 2B.1	Occurs in coastal sage scrub and coastal bluff scrub. Range limited to coastal areas of San Diego County and Baja California, Mexico.	September to May	Very low. A perennial leaf succulent that would have been observed if present.
San Diego ambrosia (<i>Ambrosia pumila</i>)	FE/— CNPS Rare Plant Rank 1B.1	Found in disturbed areas within chaparral, coastal sage scrub, and grasslands. Range includes San Diego and Riverside counties south to Baja California, Mexico.	June to September	Very low. Not known from project vicinity.
Aphanisma (<i>Aphanisma blitoides</i>)	—/— CNPS Rare Plant Rank 1B.2	Occurs in sandy areas along the coast. Range includes islands off the southern California coast from San Onofre to Imperial Beach in San Diego County.	April to May	Very low. No known populations in MSCP Plan Area.
Coastal dunes milk-vetch (<i>Astragalus tener</i> var. <i>titi</i>)	FE/SE CNPS Rare Plant Rank 1B.1	Occurs in sandy places along the coast, including coastal dunes. Range includes coastal areas of Monterey, Los Angeles, and San Diego counties.	March to May	Very low. Occurs on coastal dunes, and range does not include the project area.
Snake cholla (<i>Cylindropuntia californica</i> var. <i>californica</i>)	—/— CNPS Rare Plant Rank 1B.1	Found in open patches in coastal sage scrub, primarily in southern portion of San Diego County and in Florida Canyon.	April to June	Very low. A perennial stem succulent that would have been observed if present.
Otay tarplant (<i>Deinandra conjugens</i>)	FT/SE CNPS Rare Plant Rank 1B.1	Occurs in disturbed areas and patches of coastal sage scrub in the Otay Mesa area.	June to August	Very low. Occurs on Otay Mesa; not known from project vicinity.
Short-leaved dudleya (<i>Dudleya blochmaniae</i> ssp. <i>brevifolia</i>)	—/SE CNPS Rare Plant Rank 1B.1	Occurs on Torrey sandstone soils in chaparral and coastal scrub.	April	None. Suitable soils not present.

TABLE 5.2-3
MSCP NARROW ENDEMIC PLANT SPECIES POTENTIAL TO OCCUR

Species	Listing or Sensitivity: ^a Federal/State CNPS	Habitat(s)	Bloom Period	Potential to Occur
Variegated dudleya (<i>Dudleya variegata</i>)	—/— CNPS Rare Plant Rank 1B.2	Occurs on dry hillsides and mesas in chaparral, coastal sage scrub, grasslands, and near vernal pools. Ranges from San Diego County south to Baja California, Mexico.	May to June	Very low. Not known from project vicinity.
Spreading navarretia (<i>Navarretia fossalis</i>)	FT/— CNPS Rare Plant Rank 1B.1	Occurs in marshes and swamps (assorted freshwater habitats), playas, and vernal pools.	April to June	None. No suitable habitat present.
California Orcutt grass (<i>Orcuttia californica</i>)	FT/SE CNPS Rare Plant Rank 1B.1	Occurs within and adjacent to vernal pools.	April to June	None. No suitable habitat present.
San Diego mesa mint (<i>Pogogyne abramsii</i>)	FE/SE CNPS Rare Plant Rank 1B.1	Occurs within and adjacent to vernal pools.	March to July	None. No suitable habitat present.
Otay Mesa mint (<i>Pogogyne nudiuscula</i>)	FE/SE CNPS Rare Plant Rank 1B.1	Occurs within and adjacent to vernal pools on Otay Mesa.	March to July	None. No suitable habitat present. Not known from project vicinity.

Source: Alden Environmental 2020

Note:

^a See Appendix C of EIR Appendix C for an explanation of listing or sensitivity codes.

5.2.1.5 Sensitive Animal Species

Sensitive animal species are those that are considered federal or State rare, threatened, or endangered or MSCP-Covered Species. It also includes species on CDFW's Special Animals List (CDFW 2019). Additionally, avian nesting is sensitive. Eight resident bird species were observed on the project site, and several have potential to nest there. Nesting birds are protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code.

Observed

One sensitive animal species, orange-throated whiptail (*Aspidoscelis hyperythra beldingi*), was observed on site (Figure 5.2-1). This species is described below:

- Orange-throated whiptail (*Aspidoscelis hyperythra beldingi*)
 - Sensitivity: State Species of Special Concern; MSCP Covered Species (See Appendix C of EIR Appendix C)
 - Distribution: Southern Orange and San Bernardino counties, south to the cape of Baja California, Mexico
 - Habitat(s): Coastal sage scrub, chaparral, edges of riparian woodlands and washes. Also found in weedy, disturbed areas adjacent to these habitats. Important habitat requirements include open, sunny areas, shaded areas, and abundant invertebrate prey base, particularly termites (*Reticulitermes* sp.).
 - Presence on site: This species was observed within Diegan coastal sage scrub/disturbed habitat on the project site

Not Observed or Detected

Sensitive animal species that were not observed or detected but that may have potential to occur on the project site are listed in **Table 5.2-4, Sensitive Animal Species and Their Potential to Occur**.

5.2.1.6 Wildlife Corridors and Nursery Sites

Wildlife corridors represent areas where wildlife movement is concentrated due to natural or anthropogenic constraints. Wildlife corridors can be local or regional in scale; their functions may vary temporally and spatially based on conditions and species presence. Local corridors provide access to resources such as food, water, and shelter. Animals use local corridors, which are often hillsides or tributary drainages, to move between different habitats. Regional corridors provide these functions but also link two or more large habitat areas. Regional corridors provide avenues for wildlife dispersal, migration, and contact between otherwise distinct populations. The project site is located in an urbanized area of the city and is not located within or adjacent to any wildlife corridor, including the Multi-Habitat Planning Area (MHPA).

A wildlife nursery site is a specific, established location often used repeatedly for breeding purposes, such as a heron rookery or bat maternal colony roost. No such wildlife nursery sites were observed, and due to the small size of the project site and its urbanized location, none is expected to occur.

Table 5.2-4
SENSITIVE ANIMAL SPECIES AND THEIR POTENTIAL TO OCCUR

Species	Listing or Sensitivity: ^a Federal/State City	Habitat(s)	Potential to Occur
INVERTEBRATES			
San Diego fairy shrimp (<i>Branchinecta sandiegonensis</i>)	FE/— VPHCP	Found in shallow vernal pools and ephemeral wetlands in southern coastal California and northern Baja California, Mexico.	None. No suitable habitat on site.
Quino checkerspot butterfly (<i>Euphydryas editha quino</i>)	FE/— —	The primary larval host plant of this species in San Diego is dwarf plantain (<i>Plantago erecta</i>). Owl's clover (<i>Castilleja exserta</i>) may serve as host plant if primary host plants have senesced. Potential habitat includes areas of low-growing and sparse vegetation. Exists only as several, probably isolated, colonies in southwestern Riverside County, southern San Diego County, and northern Baja California, Mexico.	Very low. Host plant not observed on site. Site is outside the recommended survey area for the species (U.S. Fish and Wildlife Service 2014).
Hermes copper butterfly (<i>Lycaena hermes</i>)	FC/— —	Occurs in southern mixed chaparral and coastal sage scrub with mature specimens of its larval host plant, spiny redberry (<i>Rhamnus crocea</i>). Range is San Diego County, south of Fallbrook, to northern Baja California, Mexico.	Very low due to project site's small size and location in an urban setting.
Salt marsh skipper (<i>Panoquina errans</i>)	—/— Covered Species	Found in coastal salt and brackish marshes, occasionally nearby fields and wood edges.	None. No suitable habitat on site.
Riverside fairy shrimp (<i>Streptocephalus woottoni</i>)	FE/— VPHCP	Found in moderate to deep (generally ranging from 10 inches to 5 to 10 feet in depth), longer-lived vernal pools and ephemeral wetlands in southern coastal California and northern Baja California, Mexico.	None. No suitable habitat on site.
VERTEBRATES			
Amphibians and Reptiles			
Silvery legless lizard (<i>Anniella pulchra pulchra</i>)	—/SSC —	Occurs in areas with loose, sandy soil. Generally found in leaf litter, under rocks, logs, or driftwood in oak woodland, chaparral, and desert scrub. Occurs from the Bay Area south through the Coast and Peninsular ranges to northern Baja California, Mexico.	Low due to site's small size and location in an urban setting.

Table 5.2-4
SENSITIVE ANIMAL SPECIES AND THEIR POTENTIAL TO OCCUR

Species	Listing or Sensitivity: ^a Federal/State City	Habitat(s)	Potential to Occur
Arroyo toad (<i>Anaxyrus californicus</i>)	FE/SSC Covered Species	Found in washes, streams, and arroyos in semiarid areas. Prefer shallow pools and open, sandy stream terraces or sand bars with cottonwoods (<i>Populus</i> spp.), willows (<i>Salix</i> spp.), or sycamores (<i>Platanus</i> spp.). Breeds in shallow pools along stream edges with sand/gravel flats between March and June. Adults use sage scrub, mixed chaparral, and oak woodland habitats up to within 1 mile of breeding sites.	None. No suitable habitat on site.
Western pond turtle (<i>Emys marmorata</i>)	—/SSC Covered Species	Found in both permanent and intermittent waters, including marshes, streams, rivers, ponds, and lakes throughout Oregon, California, and Baja California, Mexico.	None. No suitable habitat on site.
Red-diamond rattlesnake (<i>Crotalus ruber</i>)	—/SSC —	Found in chaparral, coastal sage scrub, and along creek banks, particularly among rock outcrops or piles of debris supporting rodents. Ranges from extreme southeastern Los Angeles County (Diamond Bar) into southern San Bernardino County, and south into southern Baja California, Mexico.	Low due to site's small size and location in an urban setting.
Coast horned lizard (<i>Phrynosoma blainvillii</i>)	—/SSC Covered Species	Occurs in scrubland, grassland, coniferous woods, and broadleaf woodlands, typically in area with sandy soil, scattered shrubs, and native ant colonies.	Low due to the presence of Argentine ants that out-compete the species' native ant prey.
Coronado skink (<i>Plestiodon skiltonianus interparietalis</i>)	—/SSC —	Inhabits grasslands, coastal sage scrub, open chaparral, pine oak woodland and coniferous forests. Prefers areas where there is abundant leaf litter or low, herbaceous growth. Occurs in inland southern California south through the north Pacific coast region of northern Baja California Norte, Mexico.	Low due to site's small size and location in an urban setting.
Western spadefoot toad (<i>Spea hammondi</i>)	—/SSC —	Inhabits floodplains, washes, and low hills. Southern California habitats include coastal sage scrub, chaparral and grassland. Important habitat components include temporary pools (which form during winter and spring rains) for breeding and friable soils for burrowing.	None. No suitable habitat present.

Table 5.2-4
SENSITIVE ANIMAL SPECIES AND THEIR POTENTIAL TO OCCUR

Species	Listing or Sensitivity: ^a Federal/State City	Habitat(s)	Potential to Occur
Two-striped garter snake (<i>Thamnophis hammondi</i>)	—/SSC —	Found in permanent fresh water, inhabiting streams, ponds, and vernal pools. Occupies adjacent coastal sage scrub and grasslands during the winter.	None. No suitable habitat present.
Birds			
Cooper's hawk (<i>Accipiter cooperii</i>)	—/WL Covered Species	Occurs throughout the continental U.S. (excluding Alaska) and parts of both Montana and the Dakotas. Winters south to Mexico and Honduras. In San Diego County, tends to inhabit lowland riparian areas and oak woodlands in proximity to suitable foraging areas such as scrubland or fields. Unit (2004) noted, however, that in the 1980s Cooper's hawks began adapting to urban environments in San Diego County and nesting in eucalyptus trees and other urban trees.	Low potential to forage and nest on site due to the project site's location in an urban setting adjacent to College Avenue and Interstate 8 (I-8).
Tri-colored blackbird (<i>Agelaius tricolor</i>)	BCC/SC, SSC —	Occurs mostly in coastal lowland grasslands and wetlands, as well as freshwater marshes agricultural areas, lakeshores, parks.	None. No suitable habitat present.
Southern California rufous-crowned sparrow (<i>Aimophila ruficeps canescens</i>)	—/WL Covered Species	Inhabits coastal sage scrub and open chaparral as well as shrubby grasslands. Occur throughout the coastal lowlands and foothills of San Diego County.	Low due to project site's small size and location in an urban setting adjacent to College Avenue and I-8.
Grasshopper sparrow (<i>Ammodramus savannarum</i>)	—/SSC —	Open grasslands in the eastern U.S. and plains areas as well as coastal California. Typical habitat is dense grasslands that have little or no shrub cover.	Very low due to project site's small size and location in an urban setting adjacent to College Avenue and I-8.
Bell's sage sparrow (<i>Artemesiospiza belli belli</i>)	BCC/WL —	Found in chaparral and sage scrub with modest leaf litter. Patchy distribution throughout San Diego County, which often shifts to include partially recovered burned areas.	Low due to project site's small size and location in an urban setting adjacent to College Avenue and I-8.

Table 5.2-4
SENSITIVE ANIMAL SPECIES AND THEIR POTENTIAL TO OCCUR

Species	Listing or Sensitivity: ^a Federal/State City	Habitat(s)	Potential to Occur
Golden eagle (<i>Aquila chrysaetos</i>)	BCC/FP, WL Covered Species	Requires vast foraging areas in grassland, broken chaparral, or sage scrub. Nest in cliffs and boulders.	None. Due to project site's small size and location in an urban setting. Golden eagles are sensitive to anthropogenic presence (Palmer 1988 in U.S. Fish and Wildlife Service 2010).
Burrowing owl (<i>Athene cunicularia</i>)	BCC/SSC Covered Species	Declining species occurring in grassland or open scrub habitats. In 2003, there were an estimated 25 to 30 resident pairs of in San Diego County located primarily in the southern quarter of the county and on North Island (Lincer and Bloom 2007).	Very low. Not known from project vicinity but is typically addressed at City request.
Ferruginous hawk (<i>Buteo regalis</i>)	BCC/WL —	Found in arid and semiarid regions of North America. Grasslands, rock outcrops, shallow canyons, and gullies may characterize some habitats.	None. Suitable habitat does not occur on site.
Coastal cactus wren (<i>Campylorhynchus brunneicapillus sandiegonensis</i>)	BCC/SSC Covered Species	Occurs in arid and semiarid regions from the southwestern U.S. to southern Mexico. Occurs in coastal sage scrub with large cacti for nesting.	Very low. No cacti suitable for nesting are present.
Western snowy plover (<i>Charadrius alexandrinus nivosus</i>)	FT/SSC Covered Species	Found on sandy coasts and in brackish inland lakes up the Pacific coastline. Utilizes sandy beaches, dried mudflats, and saltpans.	None. No suitable habitat present.
Northern harrier (<i>Circus cyaneus</i>)	—/SSC Covered Species	Utilizes coastal, salt, and freshwater marshlands; grasslands; and prairies. Widespread throughout the temperate regions of North America and Eurasia. Winters and migrates throughout California from below sea level in Death Valley to an elevation of 9,800 feet. Known breeding areas in San Diego County include Torrey Pines, the Tijuana River Valley, and Camp Pendleton.	Very low due to project site's small size and location in an urban setting adjacent to College Avenue and I-8.

Table 5.2-4
SENSITIVE ANIMAL SPECIES AND THEIR POTENTIAL TO OCCUR

Species	Listing or Sensitivity: ^a Federal/State City	Habitat(s)	Potential to Occur
White-tailed kite (<i>Elanus leucurus</i>)	—/FP —	Occurs in riparian woodlands and oak or sycamore groves and adjacent grasslands on coastal slopes in San Diego County. Nests in the crowns of trees, especially coast live oak (<i>Quercus agrifolia</i>).	None. Suitable habitat not present.
Southwestern willow flycatcher (<i>Empidonax traillii extimus</i>)	FE/SE Covered Species	This flycatcher typically breeds in patchy to dense, well-developed riparian woodlands along streams, rivers, lakes, or other wetlands, composed of native riparian species such as willows (<i>Salix</i> spp.) and mule fat.	None. No suitable habitat present.
California horned lark (<i>Eremophila alpestris actia</i>)	—/WL —	Inhabits sandy beaches, agricultural fields, grasslands and open areas on coastal slopes, and in lowlands from Sonoma County to northern Baja California, Mexico.	Low due to due to limited habitat and location in an urban setting adjacent to College Avenue and I-8.
American peregrine falcon (<i>Falco peregrinus</i>)	BCC/FP Covered Species	Found in coastal sage scrub and chaparral with rock outcrops. Ranges from San Luis Obispo south through Santa Barbara, Ventura, Los Angeles, San Bernardino, Riverside, Orange, and San Diego counties and into Baja California, Mexico.	Very low. Rare fall and winter visitor. Prefers various coastal habitats for foraging and breeding.
Loggerhead shrike (<i>Lanius ludovicianus</i>)	BCC/SSC —	Found in grassland, open sage scrub, chaparral, and desert scrub. Uncommon year-round resident observed in lower elevations of San Diego County.	Very low due to site's small size and location in an urban setting adjacent to College Avenue and I-8.
Long-billed curlew (<i>Numenius americanus</i>)	BCC/WL Covered Species	Occurs on tidal mudflats and open coastal grassland.	None. No suitable habitat present.
Coastal California gnatcatcher (<i>Poliophtila californica californica</i>)	FT/SSC Covered Species	Occurs in coastal sage scrub and very open chaparral.	Low. Would likely have been observed if present.

Table 5.2-4
SENSITIVE ANIMAL SPECIES AND THEIR POTENTIAL TO OCCUR

Species	Listing or Sensitivity: ^a Federal/State City	Habitat(s)	Potential to Occur
Ridgeway's rail (<i>Rallus obsoletus</i>) formerly light-footed clapper rail (<i>Rallus longirostris levipes</i>)	FE/SE, FP Covered Species	Occurs in the lower littoral zone of coastal salt marshes where cordgrass (<i>Spartina</i> sp.) is present; however, all marsh habitats and adjacent uplands are used to some extent.	None. No suitable habitat present.
California least tern (<i>Sterna antillarum browni</i>)	FE/SE, FP Covered Species	Occurs on open sand, salt pans, or dried mudflats near lagoons or estuaries along the coast	None. No suitable habitat present.
Least Bell's vireo (<i>Vireo bellii pusillus</i>)	FE/SE Covered Species	Occurs where there is dense, stratified canopy within willow- dominated woodland or scrub, baccharis scrub, mixed oak/willow woodland, mesquite woodland, or elderberry scrub in riparian habitat.	None. No suitable habitat present.
Mammals			
Dulzura pocket mouse (<i>Chaetodipus californicus femoralis</i>)	—/SSC —	Primarily associated with mature chaparral. It has, however, been trapped in mule fat scrub and is known to occur in coastal sage scrub. Has been reported from the mouth of the Santa Margarita River south into northern Baja California, Mexico. In San Diego County, it ranges eastward to the desert transition zone.	Low due to project site's small size and location in an urban setting.
Northwestern San Diego pocket mouse (<i>Chaetodipus fallax fallax</i>)	—/SSC —	Occurs in open areas of coastal sage scrub and weedy growth, often on sandy substrates. Ranges from Los Angeles County and southern San Bernardino County south into west-central Baja California, Mexico.	Low due to project site's small size and location in an urban setting.
Western mastiff bat (<i>Eumops perotis californicus</i>)	—/SSC —	Occurs in chaparral, coastal and desert scrub, coniferous and deciduous forest, and woodland habitats. Most roost sites are in crevices in cliffs.	Low to forage on project site; unlikely to roost due to the project site's small size, location in an urban setting, and absence of cliffs.

Table 5.2-4
SENSITIVE ANIMAL SPECIES AND THEIR POTENTIAL TO OCCUR

Species	Listing or Sensitivity: ^a Federal/State City	Habitat(s)	Potential to Occur
San Diego desert woodrat (<i>Neotoma lepida intermedia</i>)	—/SSC —	Occurs in open chaparral and coastal sage scrub, often building large, stick nests in rock outcrops or around clumps of cactus or yucca. Occurs along the coastal slope of southern California from San Luis Obispo County south into coastal northwestern Baja California, Mexico.	Low. Nests likely would have been observed if present.
Southern grasshopper mouse (<i>Onychomys torridus ramona</i>)	—/SSC —	Generally found in desert habitats with loose, friable soils.	Very low due to project site's small size and location in an urban setting.
Pacific pocket mouse (<i>Perognathus longimembris pacificus</i>)	FE/SSC —	Endemic to the immediate coast (within approximately 2.5 to 3.7 miles of the Pacific coast; Spencer 2005) of southern California from Marina del Rey and El Segundo in Los Angeles County, south to the vicinity of the Mexican border in San Diego County. Found in coastal sage scrub but more often in sandy washes.	None. Project site is too far inland. Known currently from one location in Orange County and three on Camp Pendleton. Project site is also outside of species' current range.
American badger (<i>Taxidea taxus</i>)	—/SSC Covered Species	Occurs in drier, open stages of shrub steppes, agricultural fields, open woodland forests, and large grass and sagebrush meadows and valleys with friable soils	None. Suitable habitat not present.

Source: Alden Environmental 2020

Note:

^a See Appendix C of EIR Appendix C for an explanation of listing or sensitivity codes.

5.2.2 Regulatory Framework

5.2.2.1 Federal

Migratory Bird Treaty Act

The MBTA (16 U.S. Code Sections 703-711) includes provisions for protection of migratory birds, including the non-permitted take of migratory birds. The MBTA regulates or prohibits taking, killing, possession of, or harm to migratory bird species listed in Title 50 Code of Federal Regulations Section 10.13. Migratory birds include geese, ducks, shorebirds, raptors, songbirds, and many others. Disturbance that causes nest abandonment and/or loss of reproductive effort (killing or abandonment of eggs or young) is considered a “take.” The MBTA is an international treaty for the conservation and management of bird species that migrate through more than one country and is enforced in the United States by the U.S. Fish and Wildlife Service (USFWS). The MBTA was amended in 1972 to include protection for migratory birds of prey (raptors). Avian species protected by the MBTA are present on the project site. As a general/standard condition, the project must comply with the MBTA.

5.2.2.2 State

California Environmental Quality Act

Primary environmental legislation in California is found in the California Environmental Quality Act (CEQA) and its implementing guidelines (CEQA Guidelines), requiring that projects with potential adverse effects or impacts to the environment undergo environmental review. This EIR is part of that environmental review. Adverse impacts to the environment are typically mitigated as a result of the environmental review process in accordance with existing laws and regulations.

California Fish and Game Code

Pursuant to California Fish and Game Code Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Raptors and owls and their active nests are protected by California Fish and Game Code Section 3503.5, which states that it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird unless authorized by the CDFW. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA. These regulations could require that construction activities (particularly vegetation removal or construction near nests) be reduced or eliminated during critical phases of the nesting cycle unless surveys by a qualified biologist demonstrate that nests, eggs, or nesting birds will not be disturbed. As a general/standard condition, the project must comply with California Fish and Game Code.

5.2.2.3 City of San Diego

Environmentally Sensitive Lands Regulations

Mitigation requirements for sensitive biological resources follow the requirements of the City's Biology Guidelines (City of San Diego 2018a) as outlined in the City's Environmentally Sensitive Lands (ESL) Regulations (San Diego Municipal Code [SDMC] Chapter 14, Article 3, Division 1). ESL Regulations serve as standards for the determination of biological impacts and mitigation under CEQA in the City. ESL include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs and 100-year floodplains (SDMC Section 143.0110).

The purpose of the ESL Regulations is to, "protect, preserve and, where damaged, restore the ESL of San Diego and the viability of the species supported by those lands" (SDMC Section 143.0101).

The ESL Regulations specify development requirements inside and outside of the City's preserve, the MHPA. Inside the MHPA, development must be located in the least sensitive portion of a given site; outside of the MHPA, development must avoid wetlands and federal and/or State listed, non-MSCP-Covered Species (City of San Diego 2018a). As noted, the project site is not located within or adjacent to the MHPA. The ESL Regulations further require that impacts to sensitive biological resources must be assessed, and mitigation provided where necessary, as required by Section III of the City's Biology Guidelines (City of San Diego 2018a). The Biology Guidelines, MSCP, and MHPA are further addressed below.

Biology Guidelines

The City's Biology Guidelines (City of San Diego 2018a) have been formulated by the Development Services Department to aid in the implementation and interpretation of the ESL Regulations. The purpose of the ESL Regulations is to, "protect, preserve and, where damaged, restore the ESL of San Diego and the viability of the species supported by those lands" (SDMC 143.0101). Section III of the Biology Guidelines (Biological Impact Analysis and Mitigation Procedures) also serves as standards for the determination of impact and mitigation under CEQA. The Biology Guidelines are the baseline biological standards for processing Neighborhood Development Permits, Site Development Permits, and Coastal Development Permits issued pursuant to the ESL Regulations.

Multiple Species Conservation Program

The City's MSCP Subarea Plan (City of San Diego 1997) was prepared to meet the requirements of the State Natural Community Conservation Plan (NCCP) Act of 1992. The Subarea Plan is consistent with NCCP and is a stand-alone document that describes how proposed development projects may be implemented relative to the City's MSCP-designated regional preserve (i.e., the MHPA).

Multi-Habitat Planning Area

The MHPA was developed by the City in cooperation with the USFWS, CDFW, property owners, developers, and environmental groups using the Preserve Design Criteria contained in the Final MSCP Plan and the City Council-adopted criteria for the creation of the MHPA. MHPA lands are large blocks of native habitat that have the ability to support a diversity of plant and animal life and, therefore, have been included within the City's Subarea Plan for conservation. The MHPA also

delineates core biological resource areas and corridors targeted for conservation as these lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. The project site is not within the MHPA.

MHPA Land Use Adjacency Guidelines

Development adjacent to the MHPA is subject to special conditions to ensure that indirect impacts to the MHPA are minimized. Section 1.4.3 of the City's Subarea Plan outlines the requirements to address indirect effects related to drainage and toxics, lighting, noise, public access, invasive plant species, brush management, and grading/land development. The project site is not adjacent to the MHPA, however, so the adjacency guidelines would not apply.

Specific Management Directives

Section 1.5.7 of the City's MSCP Subarea Plan contains specific requirements for certain areas within the MHPA. The project site is not within the MHPA; therefore, there are no specific management directives for the project site.

Overall Management Policies and Directives

Section 1.5.7 of the City's MSCP Subarea Plan also contains requirements and goals for all MHPA areas. The project site is not within the MHPA; therefore, there are no overall management policies and directives for the project site.

5.2.3 Impact 1: Sensitive Species and Habitats

- Issue 1:** Would the project result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the CDFW or USFWS?
- Issue 2:** Would the project result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

5.2.3.1 Impact Thresholds

Sensitive Species

Based on the City Significance Determination Thresholds (2020), the project would have a significant impact to biological resources if it would result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the CDFW or USFWS.

Impacts to individual sensitive species, outside of any impacts to habitat, may also be considered significant based upon the rarity and extent of impacts. Impacts to State or federal listed species and all City Narrow Endemics would be considered significant. Certain species covered by the MSCP (as noted in the City's Biology Guidelines), and other species not covered by the MSCP may be considered significant on a case-by case basis taking into consideration all pertinent information regarding distribution, rarity, and the level of habitat conservation afforded by the MSCP. This may include species in the CNPS Inventory of Rare and Endangered Plants (CNPS 2019) or on the CDFW's list of Special Animals (CDFW 2019).

Sensitive Habitats

Based on the City Significance Determination Thresholds (2020), the project would have a significant impact to biological resources if it would result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS.

Lands containing Tier I, II, IIIA, and IIIB habitats and all wetlands are considered sensitive and declining habitats, and impacts to these resources may be considered significant. Lands designated as Tier IV are not considered to have significant habitat value and impacts would not be considered significant.

Also, a project would have a significant direct or indirect impact on biological resources (City of San Diego 2020) if the project would:

- Substantially affect an endangered, rare, or threatened species of animal or plant or the habitat of the species; and/or
- Substantially diminish important upland or riparian habitat for fish, wildlife, or plants.

Additionally, nesting birds are protected by the MBTA and California Fish and Game Code. Compliance with the MBTA and California Fish and Game Code would be required for the project as a condition of approval.

Impacts are either direct or indirect and may be permanent or temporary. A direct impact is a physical change in the environment that is caused by and immediately related to a project, wherein the primary effect is removal of existing habitat, often replacing it with developed areas. Indirect impacts consist of reasonably foreseeable secondary effects of a project (such as noise or night lighting) that lead to habitat degradation. The magnitude of an indirect impact may be the same as a direct impact; however, the effects from an indirect impact often take longer to become apparent. Permanent impacts are assessed to areas that are permanently altered as a result of developed project features. Temporary impacts are assessed to areas that would be disturbed by construction activities but not ultimately converted to hardscape or landscaping. For purposes of this analysis, all impacts associated with the project are considered permanent.

5.2.3.2 Impact Analysis

Direct Impacts

Construction of the project could result in direct injury or mortality to the orange-throated whiptail and would result in direct loss of its habitat. Although the orange-throated whiptail is a State Species of Special Concern, it is also an MSCP-Covered Species, which means that the City has take authority for it, and it is adequately conserved in the MHPA. For these reasons, project impacts to the orange-throated whiptail and its habitat would be less than significant.

Potential impacts to nesting birds could result if clearing of vegetation or construction occurs during the breeding season (February 1 to September 15). Clearing of vegetation or other construction activities could cause destruction or abandonment of active nests or mortality of adults, young, or eggs resulting in a potentially significant impact. This impact would be avoided through compliance with the MBTA and California Fish and Game Code as a condition of approval.

One bat species has been identified as having the potential to occur at the project site; however, the western mastiff bat has low potential to roost on site because the project site does not support the species preferred roosting habitat (i.e., high vertical cliffs, rock quarries, outcrops of fractures boulders, and occasionally tall buildings). While the site does support a few palm trees, the species rarely roosts in palm trees. The potential for western mastiff bat to forage on site is also considered low. While the site does support some coastal scrub (3.2 acres), that vegetation is located among non-native vegetation and disturbed/developed areas on site, and the site, itself, is surrounded by urban, developed land. The species is noted to forage over urban environments but likely only opportunistically while commuting to higher-quality habitats, none of which are adjacent to the site. As such, no impacts to western mastiff bat would occur.

Project construction would result in direct, permanent on-site impacts to 2.3 acres of Tier II Diegan coastal sage scrub, 0.9 acres of Tier II Diegan coastal sage scrub-disturbed, and 0.8 acres of Tier IIIB non-native grassland (a total of 4.0 acres on site). The total acreage of impact to sensitive habitats would be 4.0 acres. Impacts to these habitats would be significant because they are Tier I through Tier IIIB.

Indirect Impacts

Habitat insularization is the fragmentation of large habitat areas into smaller “islands” effectively isolated from one another. Such fragmentation presents barriers to wildlife movement and breeding, splits animal and plant populations, and increases edge effects. The project site is largely surrounded by development in an urbanized portion of the City, although a 2.10-acre parcel of City fee-owned parkland abuts the property generally to the south. The parkland parcel is also largely surrounded by development as it is generally bordered by the project to the north, existing housing to the north, California Department of Transportation (Caltrans) right-of-way (ROW) and I-8 to the south, and Caltrans ROW and existing housing to the east. Development of the site, therefore, would not increase habitat insularization in the area of the project site or parkland parcel.

Landscaping and irrigation associated with proposed development may result in increased runoff. However, all runoff water from the project would be collected and treated on the project site in water quality basins and discharged into the city storm water system. Based on the project’s

drainage and water quality design features, less-than-significant impacts resulting from drainage or impaired water quality would occur.

Night lighting exposes adjacent wildlife species to an unnatural light regime, may alter their behavior patterns, and consequently result in a loss of species diversity. The project's surrounding landscape consists of existing development in an urban setting with night lighting, with the exception of the inaccessible open space parcel owned by the City Parks and Recreation situated immediately to the south. However, the open space parcel is not located in or adjacent to the MHPA and as such, would not result in indirect impacts associated with lighting. As such, less-than-significant lighting impacts to wildlife would occur.

The project's surrounding landscape consists of existing development in an urban setting, with the exception of the inaccessible open space parcel located south of the project site. Additionally, the project site is adjacent to College Avenue and I-8, all of which contributes to noise on the project site. The project site is not located within or adjacent to the MHPA and is located in an existing noisy, urban environment. As such, construction-related noise from clearing, grading, and vehicular traffic associated with project construction would result in less-than-significant impacts to wildlife.

5.2.3.3 Significance of Impact

The City has take authority for the orange-throated whiptail as part of the Subarea Plan and potential impacts to the species would be less than significant.

Potentially significant construction impacts to nesting birds protected by the MBTA and California Fish and Game Code would be avoided through compliance with the regulations, as required in the conditions of approval.

Direct impacts to Tier II Diegan coastal sage scrub, Tier II Diegan coastal sage scrub-disturbed, and Tier IIIB non-native grassland would be significant.

Indirect impacts from habitat insularization, drainage/decreased water quality, lighting, and noise would not occur or would be less than significant.

5.2.3.4 Mitigation, Monitoring, and Reporting

The following mitigation shall be implemented and is required consistent with the City's MSCP Subarea Plan and Biology Guidelines (City of San Diego 2018a) to reduce the project's significant direct and indirect impacts to sensitive habitats to below a level of significance.

General Mitigation

BIO-1: Biological Resource Protection during Construction.

I. Prior to Construction

- A. **Biologist Verification** – The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City Biology Guidelines (City of San Diego 2018a), has been retained to implement the project's biological monitoring program.

The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.

- B. **Preconstruction Meeting** – The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.
- C. **Biological Documents** – The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.
- D. **Biological Construction Mitigation/Monitoring Exhibit** – The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME), which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City Assistant Deputy Director (ADD)/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.
- E. **Resource Delineation** – Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.
- F. **Education** – Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

- A. **Monitoring** – All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall

monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSV). The CSV shall be e-mailed to MMC on the first day of monitoring, the first week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.

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

III. Post Construction Measures

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

Sensitive Habitats

Mitigation for impacts to 3.2 acres of Diegan coastal sage scrub and Diegan coastal sage scrub-disturbed shall be mitigated at a ratio of 1:1 for impacts that would occur outside the MHPA, with mitigation that would occur inside the MHPA. Mitigation for impacts to 0.8 acres of non-native grassland shall be mitigated at a ratio of 0.5:1 (for habitat not occupied by the burrowing owl) since they occur outside the MHPA, and the mitigation would occur inside the MHPA (**Table 5.2-5, Mitigation for Impacts to Sensitive Habitats**). According to the Biology Guidelines (City of San Diego 2018a), the Habitat Acquisition Fund is intended to be used for the mitigation of impacts to small (generally less than 5 acres), isolated sites with lower long-term conservation value. The project's impacts that require mitigation total 4.0 acres, and the site is surrounded by existing urban development (i.e., it has low long-term conservation value), therefore, the use of the Habitat Acquisition Fund would be appropriate based on the acreage requirement and the lower long-term conservation value of the site.

**Table 5.2-5
MITIGATION FOR IMPACTS TO SENSITIVE HABITATS**

Vegetation Community	Impact (acres)	Ratio	Mitigation (acres)
Diegan coastal sage scrub (including disturbed) (Tier II)	3.2	1:1	3.2
Non-native grassland (Tier IIIB)	0.8	0.5:1 ^a	0.4
TOTAL	4.0	—	3.6

Source: Alden Environmental 2020

Note:

^a Because the habitat is not occupied by the burrowing owl.

The following mitigation is required to reduce the project's significant direct impacts to sensitive habitats to below a level of significance.

BIO-2: Sensitive Habitats. Impacts to 4.0 acres of Diegan coastal sage scrub and non-native grassland shall be mitigated at ratios of 1:1 and 0.5:1 for impacts outside the Multi-Habitat Planning Area (MHPA) and mitigation inside the MHPA, respectively, pursuant to Table 3, *Upland Mitigation Ratios*, in the City's Biology Guidelines (City of San Diego 2018a). Mitigation shall be accomplished via payment into the City's Habitat Acquisition Fund equal to 3.6 acres of habitat.

5.2.4 Impact 2: Wetlands

Issue 3: Would the project result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?

5.2.4.1 Impact Thresholds

Based on the City Significance Determination Thresholds (2020), the project would have a significant impact to biological resources if it would result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means.

5.2.4.2 Impact Analysis

There are no wetlands on the project site. Therefore, the project would not result in impacts to wetlands.

5.2.4.3 Significance of Impact

The project would result in no impacts to wetlands as none is present on the project site.

5.2.4.4 Mitigation, Monitoring, and Reporting

No impacts are identified; no mitigation is required.

5.2.5 Impact 3: Wildlife Movement and Nursery Sites

Issue 4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?

5.2.5.1 Impact Thresholds

Based on the City Significance Determination Thresholds (2020), the project would have a significant impact to biological resources if it would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites.

5.2.5.2 Impact Analysis

There are no wildlife movement corridors or habitat linkages on, or adjacent to, the project site, and there are no native wildlife nursery sites on the project site. Therefore, the project would not interfere with wildlife corridors or impede the use of native wildlife nursery sites.

5.2.5.3 Significance of Impact

The project would not interfere with wildlife corridors or impede the use of native wildlife nursery sites; no impacts are identified.

5.2.5.4 Mitigation, Monitoring, and Reporting

No significant impacts are identified; no mitigation is required.

5.2.6 Impact 4: Conservation Planning

Issue 5: Would the project result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region?

5.2.6.1 Impact Thresholds

Based on the City Significance Determination Thresholds (2020), the project would have a significant impact to biological resources if it would result in a conflict with the provisions of an adopted Habitat Conservation Plan, NCCP, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region.

5.2.6.2 Impact Analysis

Since the project site is not located within or adjacent to the MHPA, and there are no edge effects to address for the orange-throated whiptail (as required by Area Specific Management Directives for this MSCP-Covered Species identified in Appendix A of the City's MSCP Subarea Plan), the project would not conflict with the Subarea Plan or NCCP and less-than-significant impacts would occur.

5.2.6.3 Significance of Impact

The project would result in less-than-significant impacts as it would not conflict with the MSCP Subarea Plan or NCCP.

5.2.6.4 Mitigation, Monitoring, and Reporting

No significant impacts are identified; no mitigation is required.

5.2.7 Impact 5: Edge Effects

Issue 6: Would the project result in introducing a land use within an area adjacent to the MHPA that would result in adverse edge effects?

5.2.7.1 Impact Thresholds

Based on the City Significance Determination Thresholds (2020), the project would have a significant impact to biological resources if it would result in introducing a land use within an area adjacent to the MHPA that would result in adverse edge effects.

5.2.7.2 Impact Analysis

The project is not within or adjacent to the MHPA, so it would have no edge effect impacts on the MHPA.

5.2.7.3 Significance of Impact

The project would have no edge effect impacts on the MHPA, and no impacts are identified.

5.2.7.4 Mitigation, Monitoring, and Reporting

No significant impacts are identified; no mitigation is required.

5.2.8 Impact 6: Policies and Ordinances

Issue 7: Would the project result in a conflict with any local policies or ordinances protecting biological resources?

5.2.8.1 Impact Thresholds

Based on the City Significance Determination Thresholds (2020), the project would have a significant impact to biological resources if it would result in a conflict with any local policies or ordinances protecting biological resources.

5.2.8.2 Impact Analysis

As explained in Section 5.2.4.2, *Impact Analysis*, for Impact 2, *Wetlands*, there are no wetlands on the project site. Additionally, no federal and/or State listed, non-MSCP-Covered Species were found or are expected to occur on the project site. The project would be required to obtain a Site Development Permit in accordance with the ESL Regulations and would not result in a conflict with SDMC regulations protecting biological resources.

5.2.8.3 Significance of Impact

The project would not conflict with ESL Regulations, and less-than-significant impacts are identified.

5.2.8.4 Mitigation, Monitoring, and Reporting

No significant impacts are identified; no mitigation is required.

5.2.9 Impact 7: Invasive Plant Species

Issue 8: Would the proposal result in an introduction of invasive species of plants into a natural open space area?

5.2.9.1 Impact Thresholds

Based on the City Significance Determination Thresholds (2020), the project would have a significant impact to biological resources if it would result in an introduction of invasive species of plants into a natural open space area.

5.2.9.2 Impact Analysis

The project site is surrounded by existing urban development, except for fee-owned parkland owned by the City Parks and Recreation Department that abuts the project site to the south. This open space is comprised of a 2.10-acre parcel generally bordered by the project to the north, existing housing to the north, Caltrans ROW and I-8 to the south, and Caltrans ROW and existing housing to the east. The project's landscape plan incorporates native or naturalized species that are not invasive in character and would ensure native trees and plant material are used adjacent to the parkland. The project would not introduce invasive species of plants into the parkland and would

have measures in place to prevent their establishment; therefore, less-than-significant impacts are identified.

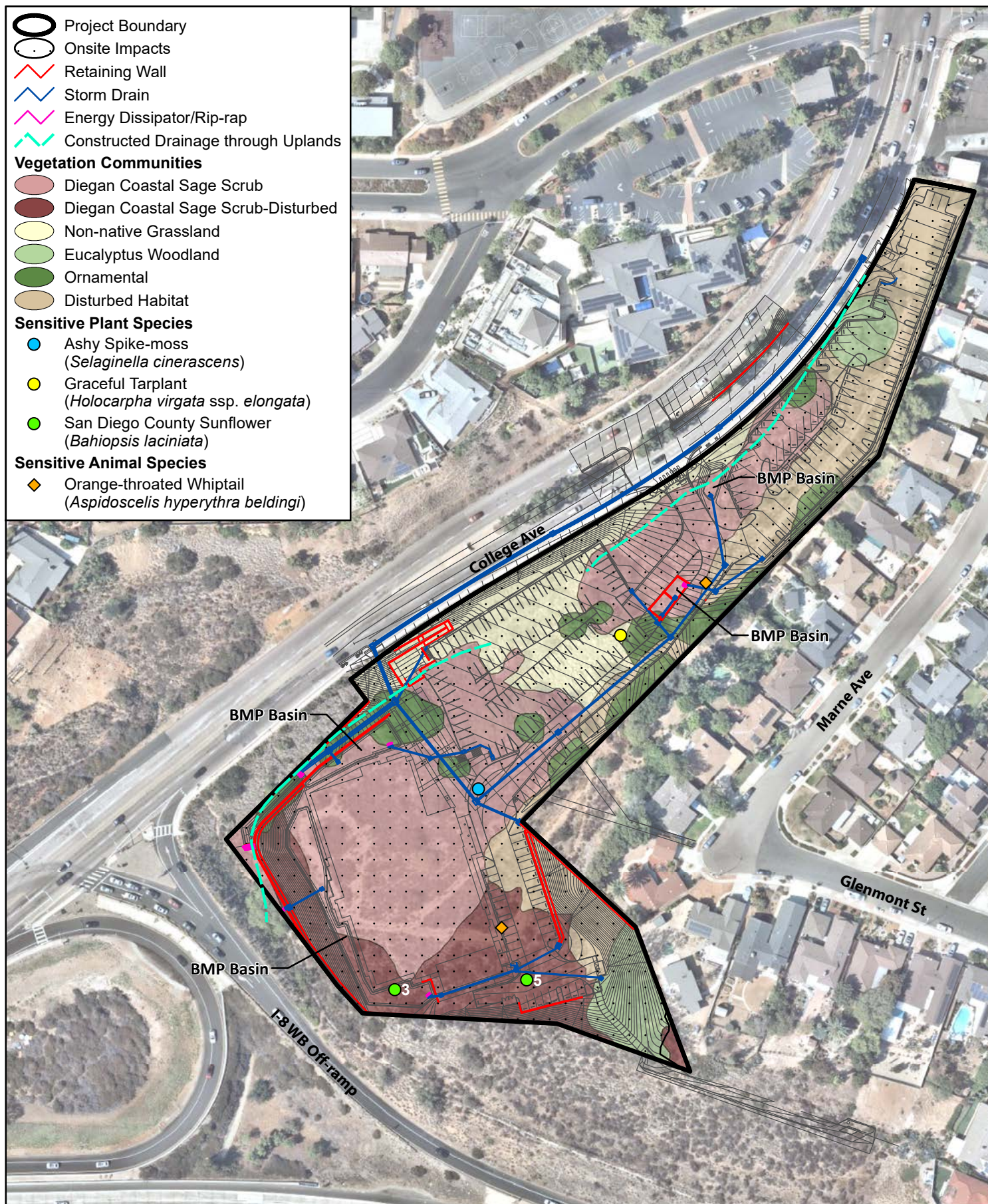
5.2.9.3 Significance of Impact

The project would not introduce invasive plant species into natural open space, and less-than-significant impacts are identified.

5.2.9.4 Mitigation, Monitoring, and Reporting

No significant impacts are identified; no mitigation is required.

Figure 5.2-1 Vegetation and Sensitive Species/Impacts



Source: Alden Environmental; Aerial Photo: Nearmap 2021



Figure 5.2-1
Vegetation and Sensitive Species/Impacts

5.3 Historical Resources

This section of the Environmental Impact Report (EIR) is based on the Phase I Cultural Resource Survey for the subject property prepared by Brian F. Smith and Associates Inc. in April 2016. The results of the Cultural Resources Survey are summarized below, with related documentation included in **Appendix D, Phase I Cultural Resource Survey for the Del Cerro Project**, to this EIR. Although the Phase I Cultural Resource Survey was prepared in 2016, there have been no changes to the project site conditions that would impact cultural resources since the survey was prepared.

5.3.1 Existing Conditions

5.3.1.1 Natural Setting

The project site is located in an urbanized area. Vegetation within the project area is classified as primarily urban/developed, including various non-native grasses, ground cover, trees, and shrubs, with limited native habitat (refer to Section 5.2, *Biological Resources*, for details). Native coastal sage scrub vegetation was likely common to the area during prehistoric times. The coastal sage scrub and chamise chaparral plan communities comprised major food resources for prehistoric inhabitants, as did the rocky foreshore and sand beach marine communities of nearby coastal environs.

5.3.1.2 Cultural Setting

Several cultures have been identified as occurring in the vicinity of the project site, including a possible Paleo Indian manifestation of the San Dieguito Complex, the Archaic and Early Milling Stone horizons represented by the La Jolla Complex, and the Late Prehistoric Kumeyaay culture. The project vicinity was used for ranching and farming following the Hispanic intrusion into the region, continuing through the historic period. Refer to the Appendix D for more detailed description of the cultural setting of the project vicinity, including the prehistory and history of the area.

5.3.1.3 Built Environment

A built environment resource is any above-ground building, structure, object, or district. Historical resources are, or may be, significant architecturally or culturally in local, state, or national history. In general, any object, building, structure, site, area, place, record or manuscript which a Lead Agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the Lead Agency's determination is supported by substantial evidence in light of the whole record (California Environmental Quality Act [CEQA] Guidelines Section 15064.5). For the purposes of CEQA review, a significant historic resource is one that meets the criteria for listing on the National Register of Historic Places (NRHP), California Register of Historic Resources (CRHR), is listed in a local historic register or is deemed significant in a historical resource survey, as provided under Public Resources Code (PRC) Section 5024.1(g) (City of San Diego 2016). The project site is currently undeveloped and contains no historic structures.

5.3.1.4 Methods and Results

Archival Research

Determinations of historical and architectural significance require a number of issues to be considered. Factors of significance include: the property's history, both construction and use; the history of the surrounding community; the potential for important persons or events to be associated with the property over its life span; the number of resources associated with the property; the potential for the resources to be the work of a master craftsman, architect, landscape gardener or artist; what historical, architectural, or landscape influences have shaped the design of the property and its pattern of use; what alterations have taken place over the years and how any changes have affected the historical integrity of the property; and the integrity of the property. These questions and related issues must be answered before a final determination of significance can be achieved.

The archival research for the project site included a records search at the South Coastal Information Center (SCIC) at San Diego State University (SDSU), and a search of the Brian F. Smith Associates archives to determine if any recorded resources were present within the project area. The SCIC records search indicated that no previously recorded archaeological sites were present at the project site, but 12 cultural resource locations have been recorded within one mile of the project site. These previously recorded sites included two prehistoric artifact scatters, two prehistoric milling feature sites with associated artifacts, one prehistoric shell scatter, one prehistoric isolate, five historic structures (including the Aztec Bowl at SDSU, located approximately 0.7 mile southwest of the project site), and one unknown resource. The majority of the historic properties identified during the records search are related to SDSU. Sixty-six cultural resource studies have been conducted within a one-mile radius of the project site. None of these previous studies overlap with the project site; however, two of the studies partially touch the edge of the study area for the project site. These two studies are large overview studies and do not contain information specific to the project site.

In addition to the records search, project research also included a review of the following historic sources: the National Register of Historic Places Index; the Office of Historic Preservation (OHP), Archaeological Determinations of Eligibility; OHP Directory of Properties in the Historic Property Data File; the 1:24,000-scale United States Geological Survey La Mesa (1953) topographic map; and the San Diego County 1872 map. The review of these sources did not indicate the presence of cultural resources within or immediately adjacent to the project. Only the archaeological records search from the SCIC documented prehistoric sites near the project boundaries.

A Sacred Lands File (SLF) search was requested from the Native American Heritage Commission (NAHC). The NAHC SLF search did not indicate the presence of any Native American cultural resources in the immediate vicinity of the project site. Contact was initiated with the tribes listed by the NAHC. One response was received, from the Lipay Nation of Santa Ysabel, with a request that a Kumeyaay Native American monitor be present for all ground-disturbing activities associated with the project.

Field Survey

In addition to the archival research described above, the Cultural Resources Survey included a pedestrian field survey. Visibility constraints were present during the survey, with only 50 percent ground visibility due to heavy vegetation. Exposed ground surfaces were closely inspected for

evidence of the potential presence of cultural resources. No artifacts, cultural ecofacts, or other materials related to prehistoric or historic land use were identified within the project site during the pedestrian field survey. No midden soils or cultural resources were observed.

5.3.2 Regulatory Framework

5.3.2.1 The National Historic Preservation Act of 1966

The National Historic Preservation Act of 1966 established the NRHP as the official federal list of cultural resources that have been nominated by state offices for their historical significance at the local, state, or national level. Listing in the NRHP provides recognition that a property is significant to the nation, the state, or the community and assumes that federal agencies consider historic values in the planning for federal and federally assisted projects. Properties listed in the NRHP, or “determined eligible” for listing, must meet certain criteria for historical significance and possess integrity of form, location, and setting. Structures and features must usually be at least 50 years old to be considered for listing in the NRHP, barring exceptional circumstances. Criteria for listing in the NRHP, which are set forth in Code of Federal Regulations Title 36, Part 60, are the quality of significance in American history, architecture, archaeology, engineering, and culture as present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and:

- (a) That are associated with events that have made a significant contribution to the broad patterns of our history;
- (b) That are associated with the lives of persons significant in our past;
- (c) That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; and/or
- (d) That have yielded, or may be likely to yield, information important in prehistory or history.

Eligible properties must meet at least one of the criteria and exhibit integrity, measured by the degree to which the resource retains its historical properties and conveys its historical character, the degree to which the original fabric has been retained, and the reversibility of changes to the property. The fourth criterion is typically reserved for archaeological and paleontological resources. These criteria have largely been incorporated into the CEQA Guidelines as well, as discussed below.

5.3.2.2 California Register of Historic Resources

State law also protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The California criteria for the CRHR are nearly identical to those for the NRHP. The State Historic Preservation Officer maintains the CRHR. Properties listed, or formally designated eligible for listing, in the NRHP are automatically listed in the CRHR, as are State Landmarks and Points of Interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys. A resource is eligible for listing in

the CRHR if the State Historical Resources Commission determines that it is a significant resource and that it meets any of the following NRHP criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. It is associated with the lives of persons important in our past;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; and/or
4. It has yielded, or may be likely to yield, information important to the prehistory or history.

Resources less than 50 years old generally are not considered for listing in the CRHR but may be considered if it can be demonstrated that sufficient time has passed to understand the historical importance of the resource.

5.3.2.3 Native American Historic Resource Protection Act

The Native American Historic Resource Protection Act (California PRC Section 5097 et seq.) addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction. It establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project. The Native American Historic Resource Protection Act establishes the NAHC as the authority to resolve disputes regarding the disposition of such remains.

5.3.2.4 California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act was enacted in 2001 (California Health and Safety Code Section 8010 et seq.). It requires all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items to complete an inventory and summary of these remains and items on or before January 1, 2003. The California Native American Graves Protection and Repatriation Act also provides a process for the identification and repatriation of these items to the culturally affiliated tribes.

5.3.2.5 California Health and Safety Code

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment of disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County coroner has examined the remains. California PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the California NAHC within 24 hours. The NAHC will notify the Most Likely Descendant. With the permission of the landowner, the Most Likely Descendant may inspect the site of the discovery. The inspection must be completed within 48 hours of notification of the Most Likely Descendant by the NAHC. The Most

Likely Descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

5.3.2.6 California Environmental Quality Act

The CEQA statutes and CEQA Guidelines contain the following sections that are relevant to archaeological and historical resources:

- California PRC Section 21083.2(g) defines “unique archaeological resource.”
- California PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) define historical resources. In addition, CEQA Guidelines Section 15064.5(b) defines the phrase “substantial adverse change” in the significance of a historical resource. It also defines the circumstances when a project would materially impair the significance of a historical resource.
- California PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated cemetery.
- California PRC Sections 21093.2(b) and 21083.2(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation-in-place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context and may help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

Under CEQA, a project may have a significant impact on the environment if it may cause “a substantial adverse change in the significance of a historical resource” (California PRC Section 21084.1; CEQA Guidelines Section 15064.5(b)). If a site is listed or eligible for listing in the CRHR, included in a local register of historic resources, or identified as significant in a historical resources survey, it is a “historical resource” and is presumed to be historically or culturally significant for the purposes of CEQA (California PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource, even if it does not meet the criteria described herein.

5.3.2.7 City of San Diego Historical Resource Regulations

The City’s Historical Resources Regulations are contained in San Diego Municipal Code Chapter 14, Article 3, Division 2. The purpose and intent of the Regulations are outlined as follows:

To protect, preserve, and where damaged, to restore the cultural resources of San Diego, which include historical buildings, historical structures or historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. These regulations are intended to ensure that development occurs in a manner that protects the overall quality of historical resources. It is further the intent of these regulations to protect the educational, cultural, economic, and general welfare of the public, while employing regulations that are consistent with sound historical preservation principles and the rights of private property owners.

The regulations apply to all development with the City of San Diego when cultural resources are present within the premises, regardless of the requirement to obtain a Neighborhood Development Permit or Site Development Permit.

The regulations have been developed to implement applicable local, state, and federal policies and mandates. Included in these are the General Plan, CEQA, and National Historic Preservation Act of 1966 Section 106. Historical resources, in the context of the City's regulations, include site improvements, buildings, structures, historic districts, signs, features (including significant trees or other landscaping), places, place names, interior elements and fixtures designated in conjunction with a property, or other objects of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the city. These include structures, buildings, archaeological sites, objects, districts, or landscapes having physical evidence of human activities. These resources are usually over 45 years old, and they may have been altered or still be in use.

5.3.2.8 City Historic Resources Register

According to the City's Historical Resources Guidelines (City of San Diego 2001), any improvement, building, structure, sign, interior element and fixture, site, place, district, area or object may be designated as historic by the City of San Diego Historical Resource Board if it meets any of the following criteria:

- A. Exemplifies or reflects special elements of the City's, a community's or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development;
- B. Is identified with persons or events significant in local, state or national history;
- C. Embodies distinctive characteristics of a style, type, period or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
- D. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist or craftsman;
- E. Is listed on or has been determined eligible by the National Park Service for listing on the NRHP or is listed or has been determined to be eligible by the California OHP for listing on the CRHR; and/or
- F. Is a finite group of resources related to one another in a clearly distinguishable way; or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest, or aesthetic value; or which represent one or more architectural periods or styles in the history and development of the city.

5.3.3 Impact 1: Historical Resources

Issue 1: Would the project result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, or object or site?

5.3.3.1 Impact Thresholds

Based on the City of San Diego's Significance Determination Thresholds (2020), historical resource impacts may be significant if the project would affect any of the following:

- A resource listed in, eligible for, or potentially eligible for the NRHP;
- A resource listed in, or determined to be eligible by, the State Historical Resources Commission, for listing in the CRHR (PRC Section 5024.1);
- A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k), or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and/or
- Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (PRC Section 5024.1), including the following criteria:
 - a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
 - b. Is associated with the lives of persons important in our past;
 - c. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
 - d. Has yielded, or may be likely to yield, information important in prehistory or history.

The determination of significance of impacts on historical and unique archaeological resources is based on the criteria found in CEQA Guidelines Section 15064.5. Section 15064.5 clarifies the definition of a substantial adverse change in the significance of a historical resource as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired."

5.3.3.2 Impact Analysis

Archaeological Resources

As discussed in the existing conditions section, no prehistoric cultural resources were recorded or observed on site. However, there are recorded cultural resources within a one-mile radius of the

project site. Based on the presence of prehistoric and historic resources in the project vicinity, and the low ground visibility at the project site during the pedestrian field survey, the potential exists for unknown buried archaeological and Native American resources to occur. The construction of the project has the potential to encounter and potentially damage or destroy unknown buried archaeological and Native American resources.

Built Environment

The project site is currently undeveloped and contains no historic structures. Off-site road improvements to College Avenue and off-site improvements associated with the proposed sewer connection would not cause impacts to any structures. Therefore, the project would not have the potential to damage historic structures.

5.3.3.3 Significance of Impacts

No prehistoric cultural resources were recorded or observed at the project site. However, ground disturbance associated with the construction of the project has the potential to uncover previously unknown archaeological and Native American resources, resulting in a potentially significant impact.

5.3.3.4 Mitigation, Monitoring, and Reporting

The following measure shall be implemented in accordance with Chapter 14, Article 3, Division 2, Historical Resources Regulations, of the Land Development Code to reduce the project's historical resources impacts to unknown archaeological resources to a less-than-significant level:

HR-1: Cultural Resources (Archaeological Resources) Protection during Construction.

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.

B. Letters of Qualification have been submitted to ADD

1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.

3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site-specific records search (0.25-mile radius) has been completed. Verification includes, but is not limited to, a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
3. The PI may submit a detailed letter to MMC requesting a reduction to the 0.25-mile radius.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. *Identify Areas to Be Monitored*
 - a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
 - b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).
3. *When Monitoring Will Occur*
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
 - b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final

construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor(s) Shall Be Present during Grading/Excavation/Trenching

1. The Archaeological Monitor shall be present full time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances Occupational Safety and Health Administration safety requirements may necessitate modification of the AME.
2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and Section IV.A-D shall commence.
3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.
4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery and shall submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.
4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance

1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.
 - b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground-disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.
 - c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (PRC) (Section 5097.98) and State Health and Safety Code (Section 7050.5) shall be undertaken:

A. Notification

1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.
2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate Discovery Site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.
2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.
3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.

C. *If human remains ARE determined to be Native American:*

1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call.
2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.
4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.
5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR;
 - b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN
 - c. To protect these sites, the landowner shall do one or more of the following:
 - (1) Record the site with the NAHC;
 - (2) Record an open space or conservation easement; or
 - (3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.

D. *If human remains are NOT Native American:*

1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC Section 5097.98).
3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS,

the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract:

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
2. The following procedures shall be followed:
 - a. No Discoveries

In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSV and submit to MMC via fax by 8 a.m. of the next business day.
 - b. Discoveries

All discoveries shall be processed and documented using the existing procedures detailed in Section III, During Construction, and Section IV, Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.
 - c. Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III, During Construction, and Section IV, Discovery of Human Remains, shall be followed.
 - d. The PI shall immediately contact MMC, or by 8 a.m. of the next business day to report and discuss the findings as indicated in Section III.B, unless other specific arrangements have been made.

B. If night and/or weekend work becomes necessary during the course of construction:

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC

establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.

- a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with State of California Department of Parks and Recreation. The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.
2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
 3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
 4. MMC shall provide written verification to the PI of the approved report.
 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.
- B. *Handling of Artifacts*
1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued.
 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
 3. The cost for curation is the responsibility of the property owner.
- C. *Curation of Artifacts: Accession Agreement and Acceptance Verification*
1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
 3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV, Discovery of Human Remains, Subsection 5.

D. *Final Monitoring Report(s)*

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

5.3.4 Impact 2: Religious or Sacred Uses

Issue 2: Would the project result in any impact to existing religious or sacred uses within the potential impact area?

5.3.4.1 Impact Thresholds

Based on the City of San Diego's Significance Determination Thresholds (2020), prehistoric and historic resource impacts may be significant if the project would result in impacts to:

- A religious property deriving primary significance from architectural or artistic distinction or historical importance; and/or
- A site associated with a burial or cemetery; religious, social, or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the belief system of a discrete ethnic population.

5.3.4.2 Impact Analysis

Based on the records search conducted for the project site, no religious or sacred uses are known to exist within the project site; however, research indicates that prehistoric and historic resources are frequent in the surrounding area. Areas in the Del Cerro neighborhood, including areas to the west and further east of the project site, have yielded cultural remains that document prehistoric occupation. While no known resources have been discovered onsite through background research or the on-site pedestrian survey, based on the presence of prehistoric and historic resources in the area, the project has the potential to encounter unknown religious or sacred resources during ground-disturbing activities.

5.3.4.3 Significance of Impacts

No existing religious or sacred use is located on the project site. However, ground disturbance associated with the construction of the project has the potential to uncover previously unknown religious or sacred resources, resulting in a potentially significant impact.

5.3.4.4 Mitigation, Monitoring, and Reporting

With implementation of **Mitigation Measure HR-1**, as described above, impacts associated with religious or sacred uses would be reduced to a less-than-significant level.

5.3.5 Impact 3: Human Remains

Issue 3: Would the project result in the disturbance of any human remains, including those interred outside of formal cemeteries?

5.3.5.1 Impact Thresholds

Based on the City of San Diego's Significance Determination Thresholds (2020), prehistoric and historic resource impacts may would be significant if the project results in the discovery of human remains.

5.3.5.2 Impact Analysis

No formal cemeteries or known burial sites have been identified on or in the immediate vicinity of the project site. In the unlikely event of a discovery of human remains, the project would be required to comply with California PRC Section 5097.98, California Health and Safety Code Section 7050.5, and California Government Code Section 27491. These regulations identify procedures to be implemented in the event of a discovery of human remains. Work would be halted, and the procedures identified in PRC Section 5097.98 and the California Health and Safety Code would be followed.

5.3.5.3 Significance of Impacts

Construction of the project would result in ground disturbance, which has the potential to uncover previously unknown resources, including unknown human remains, resulting in a potentially significant impact.

5.3.5.4 Mitigation, Monitoring, and Reporting

With implementation of **Mitigation Measure HR-1**, as described above, impacts associated with the potential for discovery of human remains would be reduced to a less-than-significant level.

5.4 Noise

This section of the Environmental Impact Report (EIR) is based on the Noise Impact Assessment prepared by ECORP Consulting, Inc. (March 2020, as amended in October 2021) that examines the potential noise impacts associated with the project. The noise analysis is summarized in this section, and both reports are included in **Appendix E, Noise Impact Assessment and Noise Technical Memorandum**, of this EIR.

5.4.1 Existing Conditions

5.4.1.1 Fundamentals of Noise and Environmental Sound

Noise is defined as unwanted or annoying sound that interferes with or disrupts normal activities. Exposure to high noise levels has been demonstrated to cause hearing loss. The individual human response to environmental noise is based on the sensitivity of that individual, the type of noise that occurs, and when the noise occurs.

Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz). The dB scale is logarithmic, not linear, and therefore sound levels cannot be added or subtracted through ordinary arithmetic. Two sound levels 10 dB apart differ in acoustic energy by a factor of 10. When the standard logarithmic decibel is A-weighted (dBA), an increase of 10 dBA is generally perceived as a doubling in loudness. For example, a 70 dBA sound is half as loud as an 80 dBA sound and twice as loud as a 60 dBA sound. When two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3 dB higher than one source under the same conditions (Federal Transit Administration [FTA] 2018).

Sound pressure level is measured on a logarithmic scale, with the 0 dBA level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dBA, and a sound that is 10 dBA less than the ambient sound level has no effect on ambient noise. Because of the nature of the human ear, a sound must be about 10 dBA greater than the reference sound to be judged as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1 to 2 dBA changes generally are not perceived.

Sound levels attenuate (or reduce) at a rate of approximately 3 dB for each doubling of distance from a line source, such as a roadway, depending on ground surface characteristics (Federal Highway Administration [FHWA] 2011). No excess attenuation is assumed for hard surfaces like a parking lot or a body of water. Soft surfaces, such as soft dirt or grass, can absorb sound, so an excess ground-attenuation value of 1.5 dB per doubling of distance is normally assumed. For line sources, an overall attenuation rate of 3 dB per doubling of distance is assumed (FHWA 2011).

In addition to the actual instantaneous measurement of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise

metrics that considers both duration and sound power level is the equivalent noise level (Leq). The Leq is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). Typically, Leq is summed over a 1-hour period. Lmax is the highest root mean squared (RMS) sound pressure level within the measuring period, and Lmin is the lowest RMS sound pressure level within the measuring period.

The time period in which noise occurs is also important since noise that occurs at night tends to be more disturbing than that which occurs during the day. Community noise is usually measured using day-night average level (Ldn), which is the 24-hour average noise level with a 10 dBA penalty for noise occurring during nighttime (10 p.m. to 7 a.m.) hours, or Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a 5 dBA penalty for noise occurring from 7 p.m. to 10 p.m. and a 10 dBA penalty for noise occurring from 10 p.m. to 7 a.m. Noise levels described by Ldn and CNEL usually do not differ by more than 1 dBA. Daytime Leq levels are louder than Ldn or CNEL levels; thus, if the Leq meets noise standards, the Ldn and CNEL are also met.

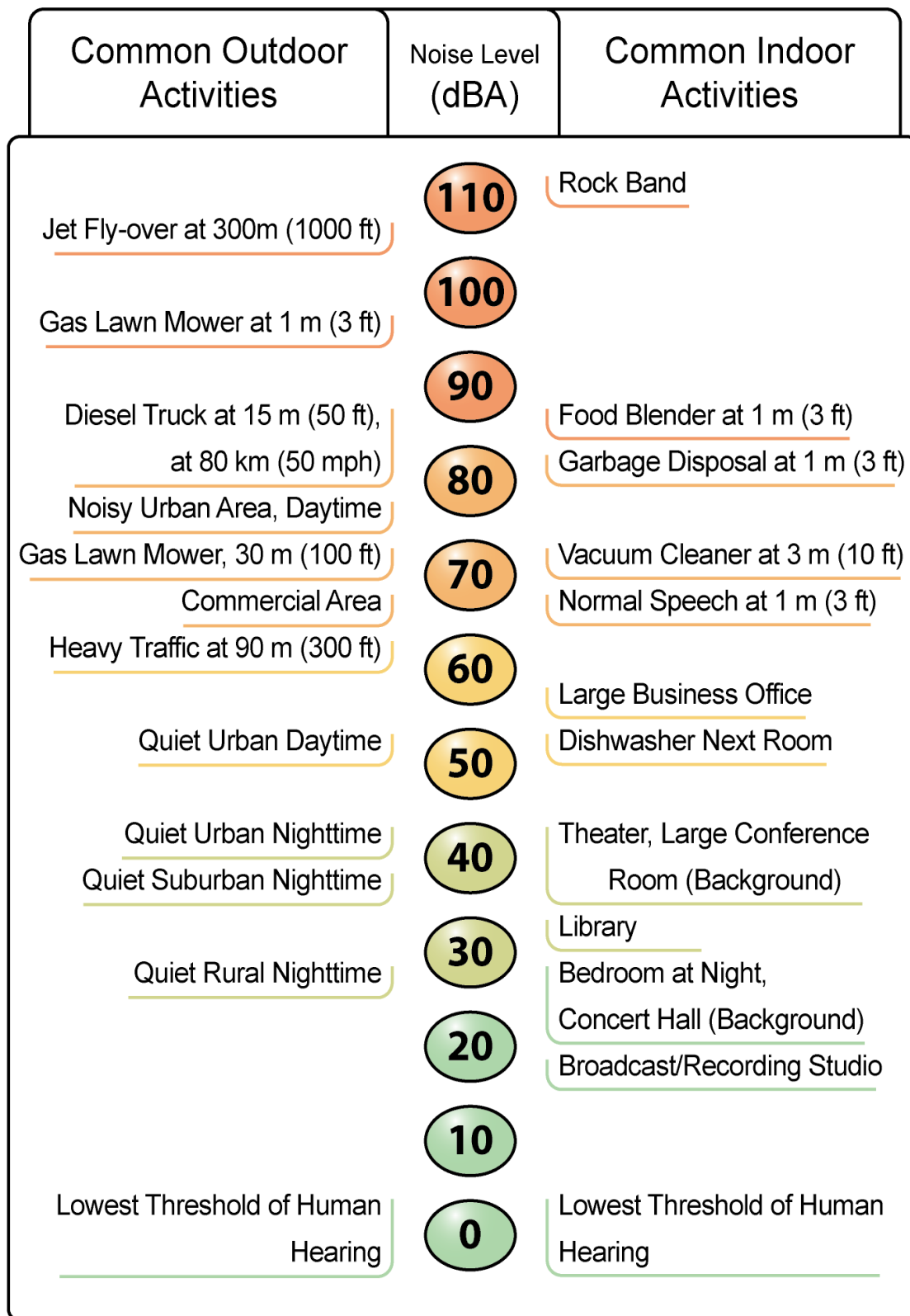
Noise levels may also be reduced by intervening structures. Generally, a single row of detached buildings between the receptor and the noise source reduces the noise level by about 5 dBA (FHWA 2008). A solid wall or berm generally reduces noise levels by 10 to 20 dBA (FHWA 2011). Noise barriers or enclosures specifically designed to reduce site-specific construction noise can provide a sound reduction of 35 dBA or greater (Western Electro-Acoustic Laboratory, Inc. 2000).

The manner in which older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows (California Department of Transportation [Caltrans] 2002). The exterior-to-interior reduction of newer residential units is generally 30 dBA or more (Harris Miller, Miller & Hanson Inc. 2006). Generally, in exterior noise environments ranging from 60 dBA CNEL to 65 dBA CNEL, interior noise levels can be maintained below 45 dBA, a generally residential interior noise standard, with the incorporation of an adequate forced air mechanical ventilation system in each residential building and standard thermal-pane residential windows/doors with a minimum rating of Sound Transmission Class (STC) 28.

Figure 5.4-1, *Common Noise Levels*, provides various sounds levels of typical noise sources in Leq.

Sensitive Receptors

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, historic sites, cemeteries, and recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses. The eastern site boundary contains residences with the closest unit located approximately 30 feet away from the project property line.



Source: California Department of Transportation 2020

Figure 5.4-1
Common Noise Levels

Existing Noise Environment

The existing noise environment surrounding the project site is dominated by motor vehicles and traffic noise. The noise source most commonly affecting the project site and vicinity is produced by automotive vehicles, mainly that on Interstate 8 (I-8) and College Avenue (e.g., cars, trucks, buses, motorcycles). Traffic moving along streets produces a sound level that remains relatively constant and is part of the project area's minimum ambient noise level.

To establish the ambient noise conditions on site, a 24-hour noise measurement was conducted on February 19, 2020, extending to February 20, 2020. Additionally, three short-term noise measurements were conducted on the afternoon of February 19, 2020. The noise measurements are representative of the typical existing noise experienced within and immediately adjacent to the project site and are depicted in **Table 5.4-1, Existing Ambient Noise Monitoring Results**. The ambient recorded noise level on the project site is 68.7 dBA CNEL. The ambient recorded noise levels adjacent to the project site ranged from 65.0 to 72.9 dBA. The noise source most commonly influencing ambient noise levels is produced by automotive vehicles, mainly those on I-8 and College Avenue (e.g., cars, trucks, buses, motorcycles). Monitoring locations are shown in **Figure 5.4-2, Noise Monitoring and Receiver Locations**.

**Table 5.4-1
EXISTING AMBIENT NOISE MONITORING RESULTS**

No.	Short-Term Measurement Location	Duration	Leq dBA	Lmin dBA	Lmax dBA
#1	At the intersection of Glenmont Street and Marne Avenue.	15 minutes	54.7	50.3	65.0
#2	At the intersection of Capri Drive and Arno Drive.	15 minutes	55.1	44.6	72.9
#3	At the intersection of Raydel Courte and Marne Avenue.	15 minutes	54.2	47.8	68.8
No.	Short-Term Measurement Location	Duration	Date	Duration	Leq (dBA)
#4	On the project site	24 hours	61.3	103.0	68.7

Source: ECORP 2020.

Notes:

L_{max} = The maximum A-weighted noise level during the measurement period.

L_{min} = The minimum A-weighted noise level during the measurement period.

Existing Traffic Noise

Existing roadway noise levels were calculated for the roadway segments in the project vicinity using the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108) and traffic volumes from the Project's *Local Mobility Analysis* (Appendix J; LOS Engineering Inc. 2021a). Due to the nature of the traffic patterns for the project, traffic volumes have been analyzed for weekdays and Sundays. The model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (energy rates) used in the FHWA model have been modified to reflect average vehicle noise rates identified for California by the California Department of Transportation (Caltrans). The Caltrans data shows that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. The average daily noise levels along the various studied roadway segments are presented in **Table 5.4-2, Existing Traffic Noise Levels**.

**Table 5.4-2
EXISTING TRAFFIC NOISE LEVELS**

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway	
		Weekday	Sunday
College Avenue			
North of Del Cerro Boulevard	Commercial and Residential	58.3	57.5
Between Del Cerro Boulevard and I-8 Westbound On-Ramp (adjacent to Project site)	Residential	60.1	59.2
North of Canyon Crest Drive	Commercial and Residential	63.6	61.5
South of Canyon Crest Drive	Commercial and Residential	62.2	60.4
Interstate 8			
I-8 Westbound Off-Ramp (toward College Avenue)	Residential	65.2	62.1
I-8 Westbound	Commercial and Residential	65.1	62.6
I-8 Eastbound	Commercial and Residential	63.2	58.4
I-8 Eastbound Off-Ramp (toward College Avenue)	Residential	59.6	58.1
Del Cerro Boulevard			
East of College Avenue	Commercial and Residential	52.7	51.8
West of College Avenue	Commercial and Residential	48.0	46.2

Source: ECORP 2020

Note:

A total of five intersections were analyzed in the Traffic Impact Study; however, only roadway segments that impact sensitive receptors were included for the purposes of this analysis.

As shown in the table, existing traffic-generated noise level on project-vicinity roadways during the weekday currently ranges from 48.0 to 65.2 dBA CNEL and 46.2 to 62.6 dBA CNEL on Sundays. As previously described, CNEL is 24-hour average noise level with a 5 dBA “weighting” during the hours of 7 p.m. to 10 p.m. and a 10 dBA weighting added to noise during the hours of 10 p.m. to 7 a.m. to account for noise sensitivity in the evening and nighttime, respectively. It should be noted that the modeled noise levels depicted in Table 5.4-2 may differ from measured levels in Table 5.4-1 because the measurements represent noise levels at different locations around the project site. Also, the short-term measurements in Table 5.4-1 are reported in different noise metrics (e.g., noise measurements are the Leq values and traffic noise levels are reported in CNEL).

5.4.2 Regulatory Framework

A project will normally have a significant noise-related effect on the environment if it will substantially increase the ambient noise levels for adjoining areas or conflict with adopted environmental plans and goals of the community in which it is located. The applicable noise standards governing the project site are the criteria in the City's General Plan Noise Element and the Noise Ordinance (San Diego Municipal Code [SDMC]).

5.4.2.1 City of San Diego General Plan Noise Element

The Noise Element of the City General Plan provides policy direction for minimizing noise impacts on the community and for coordinating with surrounding jurisdictions and other entities regarding noise control. By identifying noise-sensitive land uses and establishing compatibility guidelines for land use and noise, noise considerations will influence the general distribution, location, and intensity of future land use. The result is that effective land use planning and mitigation can alleviate the majority of noise problems.

The City requires new projects to meet exterior noise level standards as established in the Noise Element of the General Plan (City of San Diego 2015e: Policy NE-A.4). The City has adopted land use noise compatibility guidelines as a basis for planning decisions based on noise considerations. In the case that the noise levels identified at a proposed land use do not surpass the maximum allowable levels presented, the proposed land use type is considered compatible with the existing noise environment. The Land Use-Noise Compatibility Guidelines contained in the Noise Element are presented in **Table 5.4-3, City of San Diego Land Use-Noise Compatibility Guidelines**.

The City, as part of its noise guidelines, also includes standards governing interior noise levels that apply to all new single-family and multifamily residential units in California, consistent with California Code of Regulations Title 24. These standards require that acoustical studies be performed before construction at building locations where the existing Ldn exceeds 60 dBA. Such acoustical studies are required to establish mitigation measures that will limit maximum Ldn levels to 45 dBA in any habitable room. Although there are no generally applicable interior noise standards pertinent to all uses, many communities in California have adopted an Ldn of 45 dBA as an upper limit on interior noise in all residential units, as is the case for the City (see Table 5.4-3).

5.4.2.2 City of San Diego Noise Ordinance

The SDMC regulations with respect to noise are included in Chapter 5, *Public Safety, Morals, and Welfare*. SDMC Section 59.5.0404, *Construction Noise*, states that it is unlawful for any person, between the hours of 7 p.m. of any day and 7 a.m. of the following day, or on legal holidays, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator. Additionally, per Section 59.5.0404 it is unlawful for any person to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 dBA Leq during the 12-hour period from 7 a.m. to 7 p.m.

Table 5.4-3
CITY OF SAN DIEGO LAND USE-NOISE COMPATIBILITY GUIDELINES

Land Use Category	Exterior Noise Exposure			
	60	65	70	75
Parks and Recreational				
Parks, Active and Passive Recreation				
Outdoor Spectator Sports, Golf Courses; Water Recreational Facilities; Indoor Recreation Facilities				
Agricultural				
Crop Raising and Farming; Community Gardens, Aquaculture, Dairies; Horticulture Nurseries and Greenhouses; Animal Raising, Maintain and Keeping; Commercial Stables				
Residential				
Single Dwelling Units; Mobile Homes		45		
Multiple Dwelling Units (<i>*For uses affected by aircraft noise, refer to Policies NE-D.2 and NE-D.3</i>)		45	45*	
Institutional				
Hospitals; Nursing Facilities; Intermediate Care Facilities; Kindergarten through Grade 12 Educational Facilities; Libraries; Museums; Child Care Facilities		45		
Other Educational Facilities including Vocational/Trade Schools and Colleges and Universities		45	45	
Cemeteries				
Retail Sales				
Building Supplies/Equipment; Food, Beverages, and Groceries; Pets and Pet Supplies; Sundries, Pharmaceuticals, and Convenience Sales; Wearing Apparel and Accessories			50	50
Commercial Services				
Building Services; Business Support; Eating and Drinking; Financial Institutions; Maintenance and Repair; Personal Services; Assembly and Entertainment (includes public and religious assembly); Radio and Television Studios; Golf Course Support			50	50
Visitor Accommodations		45	45	45
Offices				
Business and Professional; Government; Medical, Dental, and Health Practitioner; Regional and Corporate Headquarters			50	50
Vehicle and Vehicular Equipment Sales and Service Uses				
Commercial or Personal Vehicle Repair and Maintenance; Commercial or Personal Vehicle Sales and Rentals; Vehicle Equipment and Supplies Sales and Rentals; Vehicle Parking				

Table 5.4-3
CITY OF SAN DIEGO LAND USE-NOISE COMPATIBILITY GUIDELINES

Land Use Category	Exterior Noise Exposure			
	60	65	70	75
Wholesale, Distribution, Storage Use Category				
Equipment and Materials Storage Yards; Moving and Storage Facilities; Warehouse; Storage Distribution				
Industrial				
Heavy Manufacturing; Light Manufacturing; Marine Industry; Tracking and Transportation Terminals; Mining and Extractive Industries				
Research and Development			50	

Notes:

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

Source: City of San Diego 2015e

The City's Noise Abatement and Control Ordinance also regulates fixed source and/or operational noise, as measured at the property line between the noise generator and the adjacent receptor. The noise limits are in terms of a 1-hour average sound level (or Leq). The allowable noise limits vary according to the land use and time of day. The noise limits for various land uses are depicted in **Table 5.4-4, City of San Diego Noise Ordinance Limits**. The sound level limit applies at any point on or beyond the boundary of the property on which the sound is produced. The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two zones (SDMC Section 59.5.0401(b)).

Table 5.4-4
CITY OF SAN DIEGO NOISE ORDINANCE LIMITS

Land Use Zone ^a	Time of Day	1-hour Average Sound Level (dBA)
Single-Family Residential	7 a.m. to 7 p.m.	50
	7 p.m. to 10 p.m.	45
	10 p.m. to 7 a.m.	40
Multifamily Residential (up to a maximum density of 1/2000)	7 a.m. to 7 p.m.	55
	7 p.m. to 10 p.m.	50
	10 p.m. to 7 a.m.	45
All Other Residential	7 a.m. to 7 p.m.	60
	7 p.m. to 10 p.m.	55
	10 p.m. to 7 a.m.	50
Commercial	7 a.m. to 7 p.m.	65
	7 p.m. to 10 p.m.	60
	10 p.m. to 7 a.m.	60
Manufacturing and All Other Industrial, including Agricultural and Extractive Industry	Any time	75

Source: City of San Diego Noise Ordinance SDMC Section 59.5.0401

^a The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts.

5.4.3 Impact: Ambient Noise Increase

Issue 1: Would the project result in or create a significant increase in the existing ambient noise levels?

5.4.3.1 Impact Thresholds

According to the City's Significance Determination Thresholds (2020), a project would result in a significant noise impact:

- If it would result in temporary construction noise that exceeds 75 dBA Leq (12-hour) at the property line of a residentially zoned property from 7 a.m. to 7 p.m. (as identified in SDMC Section 59.0404) or if non-emergency construction occurs during the 12-hour period from 7 a.m. to 7 p.m., Monday through Saturday. Additionally, where temporary construction noise would substantially interfere with normal business communication, or affect sensitive receptors such as daycare facilities, a significant noise impact may be identified;
- If it would result in or create a significant permanent increase in the existing noise levels. If the ambient noise level already exceeds the noted threshold, then a project contribution of 3 dBA CNEL or greater would constitute a direct significant impact; and/or

- If it would result in the generation of noise levels at a common property line that exceed the SDMC limits shown in Table 5.4-4. If a non-residential use, such as a commercial, industrial, or school use, is proposed to abut an existing residential use, the decibel level at the property line should be the arithmetic mean of the decibel levels allowed for each use as set forth in SDMC Section 59.5.0401(b).

Impacts related to land use–noise compatibility are addressed in Section 5.1, *Land Use*.

5.4.3.2 Impact Analysis

Construction Noise

Construction noise associated with the project would be temporary and would vary depending on the nature of the activities being performed. Noise generated would primarily be associated with the operation of off-road equipment for onsite construction activities as well as construction vehicle traffic on area roadways. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., building construction, paving). Noise generated by construction equipment, including earthmovers, material handlers, and portable generators, can reach high levels. Typical operating cycles for these types of construction equipment may involve one or two minutes of full-power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). During construction, exterior noise levels could negatively affect sensitive receptors in the vicinity of the construction site.

Nearby noise-sensitive land uses consist of single-family residences to the north, east, and west of the project site. In order to estimate the worst-case construction noise levels that may occur at the nearest noise-sensitive receptors in the project vicinity, the combined construction equipment noise levels were calculated using the FHWA's Roadway Noise Construction Model (2008) for the demolition, site preparation, grading, paving, building, and coating phases. Construction would move around throughout the project site on any given day and would not be concentrated at one point for an extended period of time. Therefore, the distance between proposed construction activities and receptors was measured from the center of the project site. The anticipated short-term construction noise levels generated during demolition, grading, paving, building, and coating activities are presented in **Table 5.4-5, Construction Average (dBA) Noise Levels by Receptor Distance and Construction Phase – Unmitigated Condition**.

As shown in the table, the City's noise construction standard of 75 dBA Leq would be exceeded for several construction phases resulting in a significant noise impact. Noise source control is the most effective method of controlling construction noise. Source controls, which limit noise, are the easiest to oversee on a construction project. Mitigation at the source reduces the problem everywhere, not just along one single path or for one receiver. Noise path controls are the second method in controlling noise. Barriers or enclosures can provide a substantial reduction in the nuisance effect in some cases. Path control measures include moving equipment farther away from the receiver; enclosing especially noisy activities or stationary equipment; erecting noise enclosures, barriers, or curtains; and using landscaping as a shield and dissipater. Refer to the mitigation recommendations that address this impact under Section 5.4.3.4, *Mitigation, Monitoring, and Reporting*.

**Table 5.4-5
CONSTRUCTION AVERAGE (DBA) NOISE LEVELS BY RECEPTOR DISTANCE AND CONSTRUCTION PHASE –
UNMITIGATED CONDITION**

Construction Phase	Estimated Exterior Construction Noise Level at Property Line (dBA Leq)	Construction Noise Standard (dBA Leq)	Exceeds Standards?
Site Preparation	76.1	75.0	Yes
Grading	76.8		Yes
Building Construction	77.9		Yes
Paving	77.4		Yes
Painting	64.6		No

Source: ECORP 2020

Operational Noise

Exterior Traffic Noise

Traffic is the primary operational noise source that would be generated by the project. Future traffic noise levels were modeled based on the predicted traffic volumes identified by LOS Engineering, Inc. (2021a) to determine the project's contribution to noise levels along project-vicinity roadways.

Table 5.4-6, Existing Plus Project Conditions – Predicted Traffic Noise Levels, shows the calculated offsite roadway noise levels under existing traffic noise levels compared to existing traffic noise levels with the project for weekdays and Sundays.

**Table 5.4-6
EXISTING PLUS PROJECT CONDITIONS – PREDICTED TRAFFIC NOISE LEVELS**

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway		Change in Noise Levels	Exceed 3 dBA Standard?
		Existing Conditions	Existing + Project Conditions		
Weekday Traffic Noise					
College Avenue					
North of Del Cerro Boulevard	Commercial and Residential	58.9	58.9	0.0	No
Between Del Cerro Boulevard and I-8 Westbound On-Ramp (adjacent to project site)	Residential	60.8	60.8	0.0	N/A
North of Canyon Crest Drive	Commercial and Residential	Not Analyzed in Weekday	Not Analyzed in Weekday	N/A	N/A
South of Canyon Crest Drive	Commercial and Residential	Not Analyzed in Weekday	Not Analyzed in Weekday	N/A	N/A

**Table 5.4-6
EXISTING PLUS PROJECT CONDITIONS – PREDICTED TRAFFIC NOISE LEVELS**

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway		Change in Noise Levels	Exceed 3 dBA Standard?
		Existing Conditions	Existing + Project Conditions		
Interstate 8					
I-8 Westbound Off-Ramp (toward College Avenue)	Residential	61.0	61.0	0.0	No
I-8 Westbound	Commercial and Residential	63.8	63.8	0.0	No
I-8 Eastbound	Commercial and Residential	65.0	65.0	0.0	No
I-8 Eastbound Off-Ramp (toward College Avenue)	Residential	Not Analyzed in Weekday	Not Analyzed in Weekday	N/A	N/A
Del Cerro Boulevard					
East of College Avenue	Commercial and Residential	52.1	52.1	0.0	No
West of College Avenue	Commercial and Residential	48.7	48.7	0.0	No
Sunday Traffic Noise					
College Avenue					
North of Del Cerro Boulevard	Commercial and Residential	57.5	57.6	0.1	No
Between Del Cerro Boulevard and I-8 Westbound On-Ramp (adjacent to Project site)	Residential	59.2	59.9	0.7	No
North of Canyon Crest Drive	Commercial and Residential	61.5	62.1	0.6	No
South of Canyon Crest Drive	Commercial and Residential	60.4	60.6	0.2	No
Interstate 8					
I-8 Westbound Off-Ramp (toward College Avenue)	Residential	62.1	62.1	0.0	No
I-8 Westbound	Commercial and Residential	62.7	63.8	1.1	No
I-8 Eastbound	Commercial and Residential	62.6	63.9	1.3	No
I-8 Eastbound Off-Ramp (toward College Avenue)	Residential	58.1	60.5	2.4	No

Table 5.4-6
EXISTING PLUS PROJECT CONDITIONS – PREDICTED TRAFFIC NOISE LEVELS

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway		Change in Noise Levels	Exceed 3 dBA Standard?
		Existing Conditions	Existing + Project Conditions		
Del Cerro Boulevard					
East of College Avenue	Commercial and Residential	51.8	51.9	0.1	No
West of College Avenue	Commercial and Residential	46.2	46.3	0.1	No

Source: ECORP 2021

As shown in Table 5.4-6, a large majority of the roadway's segments already experience noise levels that exceed the noise standards in the City General Plan. As previously stated, outside of the laboratory, a 3 dBA change is considered a perceivable difference. As such, an increase of 3 dBA over the existing ambient noise level is considered significant. As shown in the table, the predicted increase in weekday and Sunday traffic noise levels associated with the project would not exceed 3 dBA over existing ambient conditions. As such, the increase in traffic noise would not be perceivable and the project would have a less-than-significant impact on ambient traffic noise levels.

Parking Structure and Lot Noise

Vehicles operating in the parking structure and/or parking lots may generate noise. This would include engine operation, period car alarm activation, and other noises commonly associated with vehicles operating in a parking lot or structure. These noises would be short-term, periodic, and consistent with noise that occurs within developed areas. Because of the duration, these sources typically do not impact the overall Leq at sensitive-receptors sites located in the proximity of parking structures. Typical noise levels associated with parking lot activities are 61.1 dBA Leq (ECORP 2020).

Table 5.4-7, *Predicted Stationary Source Operational Noise Levels*, shows the predicted noise propagation associated with parking lot activity/circulation, as estimated using the SoundPLAN 3D noise model. The analysis takes into consideration the three offsite locations where baseline noise measurements were taken, as well as seven additional locations at residences adjacent to the project site. While these noises would be audible, they would be part of the ambient condition occurring in the neighborhood.

As shown in Table 5.4-7, project noise levels would reach between 36.8 and 56.8 dBA at the modeled locations, including nearby noise-sensitive residences. These numbers fall below the City's single-family residential noise standard of 60 dBA. Furthermore, project noise modeling represents a worst-case scenario in which all parking lot activity is being generated at full intensity at the same moment. It is very unlikely that noise levels on the project site would reach that of those predicted in Table 5.4-7. Finally, it should be noted that the existing ambient noise level where baseline noise measurements were taken (Locations 1 through 3 in Figure 5.4-2) already exceed noise levels predicted by that of the project under existing conditions. Less-than-significant operational noise impacts are identified.

**Table 5.4-7
PREDICTED STATIONARY SOURCE OPERATIONAL NOISE LEVELS**

Site Location	Location	Modeled Operational Noise Attributable to Project (Leq dBA)	Affected Land Use	Exceed 60 dBA Standard?
1	At the intersection of Glenmont Street and Marne Avenue	48.9	Residential	No
2	At the intersection of Capri Drive and Arno Drive	36.8	Residential	No
3	At the intersection of Raydel Courte and Marne Avenue	42.5	Residential	No
4	Residence east of the project site adjacent to sanctuary	53.9	Residential	No
5	Residence east of the project site adjacent parking garage	53.5	Residential	No
6	Residence east of the project site adjacent parking garage	56.3	Residential	No
7	Residence east of the project site	56.8	Residential	No
8	Residence east of the project site	55.6	Residential	No
9	Residence north of the project site	44.9	Residential	No
10	Residence west of the project site	48.7	Residential	No

Source: ECORP 2020

Heating, Ventilation and Air Conditioning Noise

ECORP staff regularly conducts noise measurements within various land uses, at specific noise-generating events, and at individual pieces of noise-generating equipment in order to develop a wide sampling of potential noise levels associated with such. Previous noise measurements conducted by ECORP staff within 5 feet of an operating heating, ventilation and air conditioning (HVAC) identified a sound power level of 56.8 dBA Leq. At its closest point, the project's HVAC unit would be positioned over 195 feet from the nearest residential receptor. As previously described, sound spreads (propagates) uniformly outward in a spherical pattern, and the sound level decreases (attenuates) at a rate of approximately 6 dBA for each doubling of distance from a stationary or point source. Therefore, accounting for this attenuation rate of 6 dBA for each doubling of distance from the proposed HVAC to the nearest residential receptor, the proposed HVAC unit, when operating, would generate a noise level of 30.8 dBA at the nearest residential receptor, which is well below the City standards and less-than-significant operational noise impacts are identified.

5.4.3.3 Significance of Impact

Based upon the City Noise Ordinance noise limits, construction noise impacts would have the potential to be significant exposing nearby residential properties to noise levels in excess of 75 dBA average at the property line of residentially zoned properties. Significant construction-related noise impacts are identified.

The project would not result in the exposure of people to current or future transportation noise levels that exceed City significance standards. Less-than-significant noise impacts would also occur from the operation of the parking structure and lots and HVAC equipment. Therefore, less-than-significant operational noise impacts are identified.

5.4.3.4 Mitigation, Monitoring, and Reporting

The following measure shall be required during construction to reduce temporary construction noise to acceptable levels and reduce the project's noise impacts to less than significance.

NOI-1 Best Management Practices. The following best management practices shall be incorporated into the project drawings and implemented during project construction to ensure sustained construction noise levels do not exceed 75 decibels over a 12-hour period at the nearest sensitive receivers:

- In order to reduce construction noise, a temporary noise barrier or enclosure shall be used along the property lines of adjacent residences to break the line-of-sight between the construction equipment and the adjacent residences. The temporary noise barrier shall consist of a solid plywood fence and/or flexible sound curtains attached to chain-link fencing.
- Barriers such as flexible sound control curtains shall be erected around stationary heavy equipment to minimize the amount of noise on the surrounding land uses to the maximum extent feasible during construction.
- Equipping of all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Electrical power shall be used to run air compressors and similar power tools, where feasible.
- Internal combustion engines shall be equipped with a muffler of a type recommended by the manufacturer and in good repair.
- All diesel equipment shall be operated with closed engine doors and be equipped with factory recommended mufflers.
- Prohibiting unnecessary idling of internal combustion engines.
- Locating stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors. Constructing temporary noise barriers to screen stationary noise-generating equipment when located near adjoining sensitive land uses.
- Utilization of "quiet" air compressors and other stationary noise sources where technology exists.
- Control of noise from construction workers' radios to a point where they are not audible at adjacent residences bordering the project site.
- Notifying of all adjacent residences of the construction schedule, in writing, and provide a written schedule of "noisy" construction activities to the adjacent and nearby residences at least 24 hours prior to initiation of construction activities that could result

in substantial noise levels at outdoor or indoor living areas. This notification should include the anticipated hours and duration of construction and a description of noise reduction measures being implemented at the project site. The notification should include the telephone number and/or contact information for the on-site noise control coordinator that neighbors can use for inquiries and/or to submit complaints associated with construction noise.

- Designation of a noise control coordinator who shall be responsible for responding to any complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., bad muffler, etc.) and shall require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.



Source: ECORPS; Aerial Photo: Nearmap 2021

Figure 5.4-2

Noise Monitoring and Receiver Locations

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5.5 Visual Effects and Neighborhood Character

This section evaluates potential visual effects and neighborhood character impacts associated with the project. It references environmental setting and project description information contained in other sections of this Environmental Impact Report (EIR), as applicable.

5.5.1 Existing Conditions

5.5.1.1 Visual Setting

The project site is an approximately 6-acre vacant property situated south and east of College Avenue near its interchange with Interstate 8 (I-8). The property extends from College Avenue east to a single-family neighborhood along Marne Avenue and the western end of Glenmont Street and between the I-8 off-ramp to a commercial property along Del Cerro Boulevard (refer to Figure 2-2 for project location information). As described in Section 5.2, *Biological Resources*, the project site is heavily vegetated and features a mix of native habitats, such as Diegan coastal sage scrub, as well as non-native uplands including non-native grassland, disturbed habitat, eucalyptus woodland, and ornamental plantings (i.e., pepper trees and palm trees). Existing developed areas affected by project construction include the sidewalk along the edge of College Avenue and a portion of the off-site median and street. Site photographs are contained in **Figure 5.5-1, Site Photographs from College Avenue**, and **Figure 5.5-2, Site Photograph from I-8 Corridor**.

Topographically, the terrain of the portion of the Del Cerro neighborhood surrounding the project site is hilly with development occurring along the ridgelines of undeveloped south-facing and west-facing slopes that descend in elevation toward College Avenue and I-8. As shown in Figure 2-6 in Chapter 2, *Environmental Setting*, much of the project site is lower in elevation than College Avenue, the I-8 freeway and westbound off-ramp, and the surrounding neighborhoods. The on-site terrain ranges in elevation from a low of 365 feet above mean sea level (AMSL) below the I-8 westbound off-ramp to a high of 450 feet above AMSL in the northern portion of the site. Near the center of the southern portion of the property at an elevation of 384 feet above AMSL occurs a broad level area which is surrounded by steep terrain. Much of the site has been previously altered by grading, as evidenced by the existence of artificial fill identified in the geotechnical report (Advanced Geotechnical Solutions 2020), and the steep slopes immediately east of College Avenue and north of I-8. The steep slopes are not naturally occurring since they feature the embankments created when the road and freeway were constructed.

Off-site in the nearby neighborhoods, the gas station and residences along Marne Avenue are at grade with the northern portion of the site and above grade of the southern portion of the site. Similarly, the homes along Glenmont Street (near the Marne Avenue intersection) are above the project site. Along the project frontage, College Avenue increases elevation from 400 to 450 feet above AMSL and splits grade as it travels northbound toward Del Cerro Boulevard.

5.5.1.2 Scenic Resources

In accordance with the State Scenic Highway Program, the General Plan classifies scenic highways and routes throughout the City. No roadways or freeways within the project area have been designated as scenic corridors by the California Department of Transportation (Caltrans) or the City.

In addition, no unique scenic resources occur on the project site, including trees, rock outcroppings or historic buildings, that are visible from a state scenic highway.

The Navajo Community Plan (Community Plan) does not formally designate any scenic view corridors or vantage points. However, the Community Plan does contain policies protecting the natural beauty and open space amenities of the community (see Section 5.5.2, *Regulatory Framework*).

5.5.1.3 Public Views

Public views are those provided from public resources such as freeways, public roadways, public transit, open space areas, public parks, and public recreation areas. Public views by local residents, workers and travelers through the project area are available from I-8 and other primary public roadways (i.e., College Avenue) and the light rail trolley line. There are no publicly accessible open spaces, parks, or recreation areas in the project vicinity with views of the project site; the adjacent dedicated parkland property fee-owned by the City Parks and Recreation does not have any trails or other designated public access or views. A description of the quality of views offered from public vantage points in the project area is provided below.

Freeway Views

Motorists traveling on I-8, which is adjacent to the project site, are provided peripheral views into the project site in the westbound direction, with off-ramp views of the project site available from both sides of the freeway. The eastbound I-8 travel lanes are not afforded expansive views of the project site due to the intervening local terrain and obstructions by development and the College Avenue overpass. According to Caltrans data from *2016 Traffic Volumes on California State Highways* (<http://dot.ca.gov/trafficops/census/>), which provides a snapshot of the magnitude of travelers along the freeway, the section of I-8 that crosses beneath College Avenue carries approximately 224,000 to 203,000 average annual daily trips with a peak hour volume of 17,700 vehicles. Although many freeway users travel through the project area on a daily basis, views from the freeway travel lanes are interrupted by topography and intervening development and structures (i.e., off-ramps) and are limited in duration due to the perpendicular viewing angle and high freeway rates of travel speed (i.e., 65 miles per hour [mph]). The exception are travelers exiting the I-8 westbound off-ramp at College Avenue who travel at a descending rate of speed and have peripheral views of the project site as they exit the freeway. Additionally, freeway travelers using the eastbound on-ramp to I-8 from College Avenue have unobstructed views over the freeway toward the project site until the lanes turn due east and enter the freeway (see Figure 5.5-2).

Trolley Views

The Metropolitan Transit System operates the Sycuan Green Line light rail trolley south of I-8 in the vicinity of the College Avenue freeway interchange. The trolley tracks are elevated above Alvarado Canyon Road turning south and rising up to the San Diego State University (SDSU) main campus east of College Avenue. Riders using the trolley have unobstructed views of the project site, although they are limited in duration because of the travel speed of the trolley line, intervening buildings, landscaping, and grade changes. In 2019, approximately 31,000 average daily passengers used the Sycuan Green Line Trolley (San Diego Association of Governments (SANDAG) 2020).

Local Street Views

Local street volumes and speeds are typically lower than those of the freeway and can offer longer duration views to travelers. Local streets are travelled by residents and workers who are very familiar with the visual conditions in the area, as well as visitors who are only experiencing views of the area temporarily. The primary local street with views of the project site is College Avenue, which is a 4-lane major road that splits grade in front of the project site as it rises up in elevation toward Del Cerro Boulevard. The median between the northbound and southbound travel lanes of College Avenue is partially landscaped with mature pine trees. About 30,000 vehicles travel the segment of College Avenue adjacent to the site at a posted speed limit of 40 mph.

Travelers using College Avenue are generally not afforded long-range (more comprehensive) views up or down the road corridor due to its curvilinear configuration, intervening buildings, and mature landscaping, including the median trees. Views of the project site from College Avenue are most comprehensive from the northbound travel lanes near the SDSU campus and through the I-8 interchange. As viewers travel north of the interchange and approach the project site, short-range views only capture the upper elevations of the property, as much of the project site is situated below grade of the road. Views of the project site from the southbound lanes of College Avenue traveling downhill from Del Cerro Boulevard are limited in scope due to the split grade, curvilinear routing, and intervening landscaped median. Unobstructed short-range views only appear to southbound lanes when the median breaks on the approach to the I-8 interchange. Figure 5.5-1 illustrates typical views of the site from the College Avenue travel lanes.

5.5.1.4 Designated Scenic Views

There are no scenic vistas designated in the project area. Although public views of the site are available from the travel lanes of College Avenue and I-8, neither of these vantage points are formally recognized as scenic vistas.

5.5.1.5 Neighborhood Character

The existing patterns of development in the Navajo community as a whole are predominantly suburban single-family residential in character, although there are several multifamily, commercial, and institutional buildings interspersed throughout the residential community. Examples of larger institutional structures in the Navajo community include the Temple Emanu-El, across College Avenue from the site, and St. Therese Catholic Church, located just over 0.75 miles to the northwest along College Avenue. Institutional academic buildings and multi-level parking structures associated with SDSU are located south of the project site and I-8. In addition, multi-family residential, medical office, hospital, and office buildings occur along Alvarado Canyon Road east of the interchange fronting the south side of I-8 within the College area community.

The project area is characterized by single and multi-family residential development atop steep slopes and commercial development along Del Cerro Boulevard. The single-family residences, commercial structures, and water pump station immediately adjacent to the project site are one- and two-story structures that feature backyard fencing and/or walls. Mature landscaping is interspersed throughout the community and within the College Avenue center median. West of College Avenue, across from the project site, are single-family homes atop steep undeveloped

hillsides and the multi-story Temple Emanu-El complex that resides at the intersection with Del Cerro Boulevard. A variety of architectural styles exist in the project area, including many ranch-style homes, as well as contemporary-style homes, commercial and institutional buildings. Spanish revival style buildings are also associated with campus structures at SDSU. As such, there is no specific architectural style or theme established in the Navajo community or surrounding project area.

5.5.2 Regulatory Framework

Existing policies, design guidelines, and development regulations provide relevant visual quality and neighborhood character policies for development in the project area. These include the General Plan, Community Plan, the Land Development Code (LDC), and Environmentally Sensitive Lands (ESL) Regulations.

5.5.2.1 City of San Diego General Plan

The City approved its General Plan on March 10, 2008. The General Plan is a comprehensive, long-term document that sets out a long-range vision and policy framework for how the City could grow and develop, provide public services, and maintain the qualities that define San Diego. Accordingly, the General Plan “provides policy guidance to balance the needs of a growing city while enhancing quality of life for current and future San Diegans” (City of San Diego 2008a). The General Plan is comprised of a Strategic Framework section and ten elements including: Land Use and Community Planning; Mobility; Urban Design; Public Facilities, Services, and Safety; Conservation; Historic Preservation; Noise; and Housing. The following two elements contain policies that pertain to visual resources and community character. More details on the specific General Plan policies that apply to the project are provided in Table 5.1-1 under the *Land Use* discussion.

Urban Design Element

The purpose of the Urban Design Element is “to guide physical development toward a desired image that is consistent with the social, economic and aesthetic values of the City” (City of San Diego 2008a). The Urban Design Element policies capitalize on San Diego’s natural beauty and unique neighborhoods by calling for development that respects the natural setting, enhances the distinctiveness of its neighborhoods, strengthens the natural and built linkages, and creates mixed-use, walkable villages throughout the city. Urban Design Element policies help support and implement land use and transportation decisions, encourage economic revitalization, and improve the quality of life in San Diego. Ultimately, the Urban Design Element influences the implementation of all of the General Plan’s elements and community plans. It sets goals and policies for the pattern and scale of development as well as the character of the built environment. Particularly relevant policies to the project from the Urban Design Element include Policies UC-A.3, UC-A.4, UC-A.5, UD-A.8, UD-A.10, UD-A.11, UD-A.12, UD-B.4, and UD-C.7, as discussed in Section 5.1, *Land Use*.

Conservation Element

The purpose of the Conservation Element is “to become an international model of sustainable development and conservation and to provide for the long-term conservation and sustainable management of the rich and natural resources that help define the City’s identity, contribute to its economy, and improve its quality of life” (City of San Diego 2008a). The Conservation Element

contains policies to guide the conservation of resources that are fundamental components of San Diego's environment, that help define the City's identity, and that are relied upon for continued economic prosperity. San Diego's resources include but are not limited to water, land, air, biodiversity, minerals, natural materials, recyclables, topography, viewsheds, and energy. The Conservation Element contains policies for sustainable development; preservation of open space and wildlife; management of resources; and other initiatives to protect the public health, safety, and welfare. Conservation policies applicable to the project are outlined in Section 5.1, *Land Use*, and consist of Policies CE-A.5, CE-I.4, and CE-J.4.

5.5.2.2 Navajo Community Plan

The Community Plan does not have a comprehensive urban design element like that of the General Plan. Design-related objectives and policies/proposals are, however, interspersed within Community Plan elements as outlined in Table 5.1-2 in Section 5.1, *Land Use*. The Community Environment Element of the Community Plan is focused on the community's image and visual form and recognizes the natural amenities that occur within the Community Plan area. An objective of this element is "to preserve and enhance the natural beauty and amenities of the Navajo Community." Policies geared toward implementing this objective address grading to preserve natural topography, buildings that create harmony between natural areas and urbanized development, signage that is complimentary to the community, landscaping that is focused on the heavily travelled roads in the community (i.e., College Avenue), and recognizing the importance of natural areas to conserve natural resources, preserve scenic beauty, and define urban form. See Table 5.1-2 for a listing of the specific policies from the Community Plan that are applicable to the project.

5.5.2.3 Land Development Code

The City's LDC contains numerous provisions to guide the design of development throughout the City. Through zoning and development standards, such as specified maximum building heights; maximum lot coverage; floor area ratios; and front, rear, and side yard setbacks, the LDC provides restrictions on land development and design that affect visual quality. The project site is located in the RS-1-7 zone, which is intended to accommodate single-family residential uses. The RS-1-7 zone permits a minimum lot area of 5,000 square feet (SF) and a maximum residential density of one dwelling unit (DU) for each 5,000 SF of lot area. Maximum building heights in the RS-1-7 zone are limited to 30 feet above grade. Maximum wall heights can be 6 feet above grade up to 50 linear feet. Setbacks vary in the zone depending on the configuration of the lot.

5.5.2.4 ESL Regulations

The LDC (Section 143.0101) contains development restrictions and guidelines to protect and enhance environmentally sensitive lands. Among other resources, the regulations are applied when a project impacts steep hillsides. Steep hillsides are defined as those with natural gradients equal to or in excess of 25 percent with a minimum elevation differential of 50 feet, or a natural gradient of 200 percent with a minimum elevation differential of 10 feet. The project site does not contain any naturally steep hillsides meeting these criteria, and these regulations are not discussed further.

5.5.3 Impact 1: Scenic Views

Issue 1: Would the project result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?

5.5.3.1 Impact Thresholds

According to the City's Significance Determination Thresholds (2020), visual impacts may be significant if the project would:

- Substantially block a view through a designated public view corridor as shown in an adopted community plan, the General Plan, or the Local Coastal Program;
- Cause substantial view blockage from a public viewing area of a public resource (such as the ocean) that is considered significant by the applicable community plan; and/or
- Exceed the allowed height or bulk regulations, and this excess results in a substantial view blockage from a public viewing area.

5.5.3.2 Impact Analysis

There are no vistas or scenic views designated in the project area by the Community Plan or General Plan. Although public views of the site are available from the travel lanes of College Avenue and I-8, neither of these vantage points are considered scenic vistas. In addition, there are no public resources visible from public viewing areas nearby. The roofline modulating elements of the church/sanctuary building would exceed the 30-foot building height limit in the RS-1-7 zone; however, the exceedance would not block a view of a designated public resource from a public viewing area, such as local roads. Therefore, the project would not obstruct any vista or scenic views identified in the Community Plan or General Plan.

5.5.3.3 Significance of Impact

The project would not block a designated public view corridor or a public viewing area of a public resource that is considered significant by the applicable community plan or General Plan. Therefore, less-than-significant impacts to public views would occur as a result of the project.

5.5.3.4 Mitigation, Monitoring, and Reporting

No significant impacts to public views are identified; therefore, no mitigation measures are required.

5.5.4 Impact 2: Neighborhood Character

Issue 2: Would the project result in the creation of a negative aesthetic site or project?

Issue 3: Would the project result in a project bulk, scale, materials, or style which would be incompatible with surrounding development?

Issue 4: Would the project result in substantial alteration to the existing or planned character of the area such as could occur with the construction of a subdivision in a previously undeveloped area? Note: for substantial alteration to occur, new development would have to be of a size, scale, or design that would markedly contrast with the character of the surrounding area.

5.5.4.1 Impact Thresholds

According to the City's Significance Determination Thresholds (2020), visual impacts to neighborhood character may be significant if the project would:

- Exceed the allowable height or bulk regulations and the height and bulk of the existing patterns of development in the vicinity of the project by a substantial margin;
- Have a negative visual appearance that meets one or more of the following conditions:
 - The project would create a disorganized appearance and would substantially conflict with City codes;
 - The project would significantly conflict with the height, bulk, or coverage regulations of the zone and does not provide architectural interest; and/or
 - The project includes crib, retaining, or noise walls greater than 6 feet in height and 50 feet in length with minimal landscape screening or berming where the walls would be visible to the public.
- Have an architectural style or use building materials in stark contrast to adjacent development where the adjacent development follows a single or common architectural theme;
- Be located in a highly visible area (e.g., on a canyon edge, hilltop or adjacent to an interstate highway) and would strongly contrast with the surrounding development or natural topography through excessive height, bulk, signage, or architectural projections; and/or
- Result in the physical loss, isolation or degradation of a community identification symbol or landmark (e.g., a stand of trees, coastal bluff, historic landmark) which is identified in the General Plan, applicable community plan or local coastal program.

5.5.4.2 Impact Analysis

Height and Bulk Regulations

The majority of the church/sanctuary building would comply with the 30-foot height limit established for the RS-1-7 zone. The exception would be the building's roofline modulation elements and religious symbol (i.e., cross). Three roof towers and a cross atop one of the towers would extend above the main roof to a height of 45 to 48 feet above grade for the roof towers and to 53 feet

above grade for the cross (refer to Figures 3-2 and 3-3 in the *Project Description*). The tower elements are proposed along the north, south and west elevations of the church structure to create visual interest and the cross signifies a religious assembly structure to passers-by from public roads, comparable to other religious assembly buildings in the community. The tallest roof tower feature would occur on the north elevation marking the entrance to the church/sanctuary between the entry plaza and parking structure. The roof tower would extend approximately 21 feet above grade at a minimum distance of 120 feet from the nearest residential properties along Marne Avenue (refer to **Figure 5.5-3, Architectural Cross-Sections**). The cross feature on the west elevation facing College Avenue would extend 8 feet higher than the 45-foot-high tower element and be situated approximately 24 feet above grade and over 210 feet west of the nearest residential properties. Cross-sections of the project grading and architecture relative to its surroundings are provided in Figure 3-4 in the *Project Description*.

In addition to the site layout that would place the church/sanctuary building in the southern portion of the site away from the residential neighborhood, a minimum 5-foot-wide landscape buffer containing spreading ground covers, taller screening shrubs and canopy trees, ranging in height from 25 to 40 feet, would be installed between the surface parking areas and residential properties to the east (Figure 3-6). As shown in the project cross-sections, although the rooftop elements of the project would exceed the allowable height regulations in the RS-1-7 zone, the church/sanctuary building itself would be placed in the lowest elevation of the site and recessed into the terrain, setback 195 feet from nearby residential properties, and architectural design elements and landscape buffer treatments would provide visual interest and screening to the nearby residential properties, thus avoiding a negative visual appearance despite the exceedance of the allowable height or bulk regulations.

Visual Appearance

The church/sanctuary building and parking structure are designed in a contemporary Spanish Colonial Revival-style theme featuring arched entrances and windows along their painted concrete tilt-up facades, with accents of wood facia and terra cotta colored tile roofing materials. The glazing for each window would be tinted bronze in color. Exterior building elevations and articulations are shown on Figures 3-2 and 3-3. The project's massing and architectural style would be distinctive from that of the surrounding one-story, ranch-style homes in the project vicinity. The project's architectural and landscape treatments would create visual interest and aesthetic features that would create a cohesive, rather than a disorganized, appearance. **Figure 5.5-4a, Project Visual Simulations – Northbound**, and **Figure 5.5-4b, Project Visual Simulations – Southbound**, contain computer simulations of the project when viewed from the travel lanes of College Avenue.

There is no consistent architectural styling or theme in the project area that would be disordered by the project; however, the project design would not resemble the low-stature residential subdivision style of the nearby neighborhood and instead would reflect the architectural styling of the SDSU academic buildings across the I-8/College Avenue interchange from the site. A similar architectural style is also used for a multi-family residential structure visible in the project area near Alvarado Hospital as well. Furthermore, the proposed church/sanctuary is not proposed on a visually prominent hillside or ridgeline, but rather on a topographic low-spot on the project site adjacent to the I-8 right of way (ROW).

A deviation for retaining wall heights is proposed to implement the project site/grading plan and form usable building areas in which to place the church structure and parking areas on the property. The retaining walls along the southern property line would also prevent the need to grade into the Caltrans ROW for I-8. There would be two retaining walls greater than 6 feet in height and longer than 50 feet in length that would be visible to the public and require deviations from the City development regulations. Both retaining walls are proposed along the southern project boundary fronting I-8 and its interchange with College Avenue to form building areas for the proposed structure and parking areas. The retaining walls would range in height from 4 to 19 feet and reach lengths between 75 and 450 linear feet. Both retaining walls would be placed below grade of the I-8 and College Avenue travel lanes and beyond the field of vision for drivers. Landscaping in the forms of trees, shrubs, and vines would be installed at the top and base of the walls to soften their appearance and ultimately provide visual screening through their growth characteristics (see Figure 3-6 in the *Project Description*). Additional discussion of the retaining walls is provided below in the landform alteration discussion under Issue 6.

Although the project would substantially alter the existing and planned residential character of the area, the project's height, bulk, signage, or architectural projections would not result in a negative visual appearance due to its topographically-sensitive site layout, cohesive architectural styling, and below grade placement of retaining walls combined with the heavy use of screening vegetation and landscape treatments to soften its appearance from nearby public and private viewing areas.

Community Symbol or Landmark

The project would develop a vacant site and would remove natural and non-native vegetation that currently occurs on site but is not recognized in the General Plan or Community Plan as unique or unusual in its appearance. There are no community identifying symbols, such as trees or historic structures, that would be removed by the project. Therefore, the project would not result in the loss, isolation, or degradation of a community identification symbol, or landmark identified in the General Plan or Community Plan. The project would appear to be a continuation of existing patterns of development in the project area at large.

5.5.4.3 Significance of Impact

Although the project would substantially change the character of the project site, the project design, as expressed through its grading, architecture, and landscaping, would not result in a negative visual appearance, exceed the bulk and scale of existing patterns of development in the area by a substantial margin, create a disordered appearance due to architectural style, result in the loss of a community identification symbol, or strongly contrast with surrounding development through excessive height, bulk, or architectural projections. Therefore, less-than-significant neighborhood character impacts would occur.

5.5.4.4 Mitigation, Monitoring, and Reporting

No significant impacts are identified; therefore, no mitigation is required.

5.5.5 Impact 4: Landmark Trees

Issue 5: Would the project result in the loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan? (Normally, the removal of non-native trees within a wetland as part of a restoration project would not be considered significant).

5.5.5.1 Impact Thresholds

If a project would result in the removal of any distinctive or landmark trees or stand of mature trees that are identified in the community plan, a significant impact would occur.

5.5.5.2 Impact Analysis

The Community Plan does not identify any of the trees located on the project site as scenic resources. Therefore, no impact would occur.

5.5.5.3 Significance of Impact

No distinctive or landmark trees are located on the project site; no impacts are identified.

5.5.5.4 Mitigation, Monitoring, and Reporting

No significant impacts would occur; no mitigation is required.

5.5.6 Impact 5: Landform Alteration

Issue 6: Would the project result in a substantial change in the existing landform?

5.5.6.1 Impact Thresholds

According to the City's Significance Determination Thresholds (2016), landform impacts may be significant if the project would:

- Alter more than 2,000 cubic yards of earth per graded acre by either excavation or fill, in addition to one or more of the following conditions:
 - Disturb steep hillsides in excess of the encroachment allowances of the ESL regulations (LDC Chapter 14, Article 3, Division 1);
 - Create manufactured slopes higher than 10 feet or steeper than 2:1 (50 percent); and/or
 - Result in a change in elevation of steep hillsides from existing grade to proposed grade of more than 5 feet by either excavation or fill unless the area over which excavation or fill would exceed 5 feet is only at isolated points on the site.

The above conditions may not be considered significant, however, if the grading plans clearly demonstrate, with both spot elevations and contours, that the proposed landforms will very closely

imitate the existing on-site landform and/or the undisturbed, pre-existing surrounding neighborhood landforms. This may be achieved through “naturalized” variable slopes.

5.5.6.2 Impact Analysis

Approximately 93 percent (or 5.6 acres) of the approximately 6-acre site would be graded to implement the project. Grading would require 16,500 cubic yards (cy) of cut and 39,000 cy of fill. The proposed grading would result in 6,964 cy per graded acre, which would exceed the 2,000 cy per graded acre significance threshold. However, as described in Chapter 2, *Environmental Setting*, and shown as Figures 2-6 and 2-7, prior grading has altered site topography and fills on the order of 20 to 30 feet deep were historically placed throughout the site. Therefore, there are no naturally occurring steep slopes or natural topography on the project site.

The maximum fill depth proposed by the project would be 28 feet, while the maximum cut depth would be 25.5 feet. Manufactured slopes would be created around the perimeter of the site ranging in height from 5 to 23 feet; however, all slopes would not be steeper than 2:1 in accordance with the LDC grading requirements. Elevation changes of more than 5 feet on steep hillsides would not be significant because the on-site hillsides are not naturally occurring as defined by the ESL Regulations (San Diego Municipal Code [SDMC] Section 143.0142). Retaining walls would be used in several locations to form buildable areas and avoid grading into the Caltrans ROW, as described under Issue 2 and shown in Figure 3-1. Due to the extent of prior site disturbances and grading on the project site, proposed grading would not have a significant impact on natural landforms.

5.5.6.3 Significance of Impact

Although the project would cause more than 2,000 cy of cut and fill per graded acre and would exceed the 10-foot-high threshold for manufactured slopes, the project site's topography and landforms are not naturally occurring; therefore, the impact to existing landforms would be considered less than significant.

5.5.6.4 Mitigation, Monitoring, and Reporting

No significant impacts to natural landforms are identified; no mitigation is required.

5.5.7 Impact 6: Light and Glare

Issue 6: Would the project result in substantial light or glare which would adversely affect daytime or nighttime view in the area?

5.5.7.1 Impact Thresholds

According to the City's Significance Determination Thresholds (2016), light and glare impacts may be significant if the project would meet one or more of the following thresholds:

- The project would be moderate to large in scale, more than 50 percent of any single elevation of a building's exterior is built with a light reflectivity greater than 30 percent (per LDC Section 142.07330(a)), and the project is adjacent to a major public roadway or public area.

- The project would shed substantial light onto adjacent, light-sensitive property or land use, or emit a substantial amount of ambient light the nighttime sky.

5.5.7.2 Impact Analysis

Wayfinding, safety/security, and landscape/architectural accent lighting would be installed on the project site, where none currently exist, as part of the project. All lighting would comply with SDMC Section 142.0740, *Outdoor Lighting Regulations*, which require the minimization of negative impacts from light pollution including light trespass, glare, and urban sky glow. Exterior lighting would be directed away from the adjoining properties and shielded to reduce impacts to the adjacent light-sensitive uses and public ROW. The new traffic signal and street lighting at the project entrance would also be required to comply with the outdoor lighting regulations. Lighting sources would be required to comply with the City's standards for low-sodium bulbs to protect the nighttime sky, and intense and visible security or flood lighting is strictly prohibited. The amount of window glazing on the exterior of the proposed church/sanctuary building would comply with SDMC Section 142.0730. Therefore, the project would not produce a substantial amount of light and glare affecting day or nighttime views in the area.

5.5.7.3 Significance of Impact

Compliance with the City regulations governing exterior lighting and glazing would ensure that less-than-significant impacts would occur due to light and glare.

5.5.7.4 Mitigation, Monitoring, and Reporting

No significant impacts from light and glare are identified; therefore, no mitigation measures are required.



Northbound view



Southbound view

Figure 5.5-1

Site Photographs from College Avenue

ALL PEOPLES CHURCH



View 1

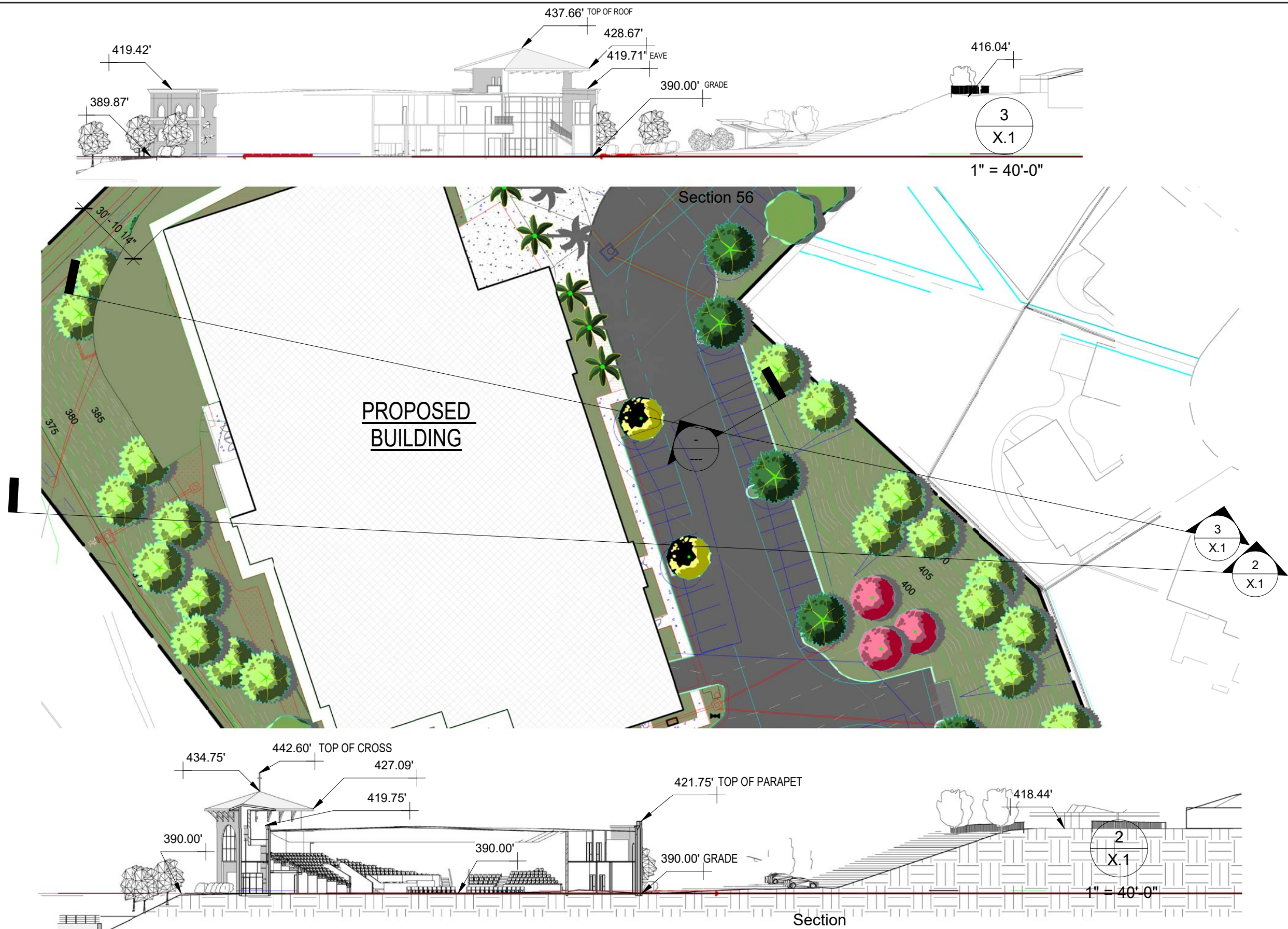


View 2

Figure 5.5-2

Site Photographs from I-8 Corridor

ALL PEOPLES CHURCH



Source: Kenneth D. Smith Architect & Associates 2021

Figure 5.5-3

Architectural Cross-Sections

ALL PEOPLES CHURCH



View near overpass



View near project property line



View near project entrance



View near surface parking

Source: 2021

Figure 5.5-4a

Project Visual Simulations - Northbound

ALL PEOPLES CHURCH



View of project entry



View near southwest property line

Source: 2021

Figure 5.5-4b

Project Visual Simulations - Southbound

ALL PEOPLES CHURCH

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5.6 Tribal Cultural Resources

This section of the Environmental Impact Report (EIR) evaluates potential tribal cultural resources (TCRs) impacts associated with the project. The analysis is based, in part, on the Phase I Cultural Resource Survey for the subject property prepared by Brian F. Smith and Associates Inc. in April 2016 and consultation with California Native American tribes traditionally and culturally affiliated with the project area who have requested consultation pursuant to Public Resources Code (PRC) Section 21080.3.1.

5.6.1 Existing Conditions

No TCRs are known to exist on the project site. Refer to Section 5.3, *Historical Resources*, of this EIR for a discussion of existing conditions related to the cultural setting of the project vicinity.

5.6.2 Regulatory Framework

5.6.2.1 The Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items, such as human remains, funerary objects, sacred objects, or objects of cultural patrimony, to lineal descendants and culturally affiliated Indian tribes.

5.6.2.2 California Register of Historic Resources

State law also protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The California criteria for the California Register of Historic Resources (CRHR) are nearly identical to those for the National Register of Historic Places (NRHP). The State Historic Preservation Officer maintains the CRHR. Properties listed, or formally designated eligible for listing, in the NRHP are automatically listed in the CRHR, as are State Landmarks and Points of Interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys. A resource is eligible for listing in the CRHR if the State Historical Resources Commission determines that it is a significant resource and that it meets any of the following NRHP criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. It is associated with the lives of persons important in our past;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; and/or
4. It has yielded, or may be likely to yield, information important to the prehistory or history.

Resources less than 50 years old generally are not considered for listing in the CRHR but may be considered if it can be demonstrated that sufficient time has passed to understand the historical importance of the resource.

5.6.2.3 Native American Historic Resource Protection Act

The Native American Historic Resource Protection Act (California PRC Section 5097 et seq.) addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction. It establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project. The Native American Historic Resource Protection Act establishes the Native American Heritage Commission (NAHC) as the authority to resolve disputes regarding the disposition of such remains.

5.6.2.4 California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act was enacted in 2001 (California Health and Safety Code Section 8010 et seq.). It requires all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items to complete an inventory and summary of these remains and items on or before January 1, 2003. The California Native American Graves Protection and Repatriation Act also provides a process for the identification and repatriation of these items to the culturally affiliated tribes.

5.6.2.5 California Health and Safety Code

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment of disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County coroner has examined the remains. California PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the California NAHC within 24 hours. The NAHC will notify the Most Likely Descendant. With the permission of the landowner, the Most Likely Descendant may inspect the site of the discovery. The inspection must be completed within 48 hours of notification of the Most Likely Descendant by the NAHC. The Most Likely Descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains, and items associated with Native Americans.

5.6.2.6 Assembly Bill 52

Assembly Bill 52 (AB 52), the Native American Historic Resources Protection Act, applies to projects that file a notice of preparation for an EIR or notice of intent to adopt a negative or mitigated negative declaration on or after July 1, 2016. AB 52 adds TCRs to the specific cultural resources protected under the California Environmental Quality Act (CEQA). Under AB 52, a tribal cultural resource is defined as a site, feature, place, cultural landscape (must be geographically defined in terms of size and scope), sacred place, or object with cultural value to a California Native American tribe that is either included or eligible for inclusion in the California Register or included in a local register of historical resources. A Native American tribe or the lead agency, supported by substantial evidence, may choose at its discretion to treat a resource as a tribal cultural resource. AB 52 also mandates lead agencies to consult with tribes, if requested by the tribe, and sets the principles for conducting and concluding consultation.

5.6.2.7 City of San Diego General Plan

Historic Preservation Element Policy HP-A.5.e in the City of San Diego (City) General Plan states that Native American monitors should be included during all phases of the investigation of archaeological resources. This would include surveys, testing, evaluations, data recovery phases, and construction monitoring.

5.6.3 Impact 1: Tribal Cultural Resources

The City has not yet prepared Significance Determination Thresholds for potential impacts to TCRs. Therefore, for purposes of this analysis, guidance provided by issue questions listed in CEQA Guidelines Appendix G are used to evaluate the potential for significant impacts to TCRs, as presented below.

- Issue 1: Would the project result in a substantial adverse change in the significance of a tribal cultural resource, defined I Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geologically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
- a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? or**
 - b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

5.6.3.1 Impact Analysis

AB 52 requires meaningful consultation with California Native American tribes on potential impacts to TCRs, as defined in PRC Section 21074. TCRs are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the CRHR or local register of historical resources.

In accordance with the requirements of PRC Section 21080.3.1, the City provided formal notification to the Lipay Nation of Santa Ysabel, Jamul Indian Village, and San Pasqual Band of Mission Indians, all of which requested consultation and agreed that construction monitoring should be conducted by a Native American monitor. The project site does not contain 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 PRC. Although TCRs have not been identified in the project area, the area is considered sensitive for potential TCRs. Therefore, there is the potential for the inadvertent discovery of a resource that could be impacted by project implementation.

5.6.3.2 Significance of Impacts

No prehistoric cultural resources were recorded or observed at the project site. However, ground disturbance associated with the construction of the project has the potential to uncover previously unknown TCRs, resulting in a potentially significant impact.

5.6.3.3 Mitigation, Monitoring, and Reporting

With implementation of **Mitigation Measure HR-1**, as described in Section 5.3, *Historical Resources*, impacts associated with TCRs would be reduced to a less-than-significant level.

6. CUMULATIVE IMPACTS

California Environmental Quality Act (CEQA) Guidelines Section 15130 requires that an Environmental Impact Report (EIR) address cumulative impacts of a project when its incremental effect would be cumulatively considerable. *Cumulatively considerable* means that the incremental effects of an individual project would be considerable when viewed in connection with the effects of past, current, or probable future projects.

According to CEQA Guidelines Section 15130, the discussion of cumulative effects “need not provide as great a detail as is provided of the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness.” The evaluation of cumulative impacts is to be based on either: “(A) a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or (B) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative effect. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency.”

The basis and geographic area for the analysis of cumulative impacts is dependent on the nature of the issue and the project. In some cases, regional planning addresses cumulative impacts, while in other cases, the analysis takes into consideration more-localized effects. For the All Peoples Church Project (project), a plan approach is generally taken given the built-out and developed nature of the Navajo Community Plan area and, specifically, the Del Cerro neighborhood near the project site. However, the San Diego State University (SDSU) Master Plan proposes faculty/staff housing in the Adobe Falls portion of the Navajo community in the vicinity of the project and is taken into consideration in this cumulative impacts discussion, as appropriate. The timing and details of the Adobe Falls housing development are unknown at this time (SDSU 2007). **Figure 6-1, *Cumulative Setting***, illustrates the project’s proximity to the SDSU housing site in Adobe Falls.

Based on the analyses contained in Chapter 5, *Environmental Analysis*, the project’s impacts to biological resources, historical resources, noise and tribal cultural resources (TCRs) would be potentially significant prior to implementation of mitigation, while project impacts to land use and visual effects/neighborhood character would less than significant. The following is a discussion of whether or not these direct impacts would contribute to cumulative impacts and if that contribution is cumulatively considerable.

6.1 Effects Found to Be Not Cumulatively Considerable

6.1.1 Land Use

The project would amend the Navajo Community Plan to include a church use on a residentially designated parcel and require deviations from the RS-1-7 zone for building heights, wall heights, setbacks, and bicycle parking. The Community Plan Amendment (CPA) would be consistent with the goals and policies of the General Plan and community plan and any community plan specific amendment criteria; would provide additional public benefit to the community as compared to the

existing land use designation; and public facilities appear to be available to serve the project. Overall, the project reflects the goals and policies intended to support the General Plan policies and is consistent with the goals of the Navajo Community Plan, as described in Section 5.1, *Land Use*. In addition, the project would implement the goals and objectives of the Climate Action Plan by including energy and water efficient fixtures, and incorporating design features that would encourage bicycling, walking, and transit use. No conflicts with adopted environmental plans, such as the Environmentally Sensitive Lands (ESL) regulations and other San Diego Municipal Code (SDMC) requirements, would occur given the project's location outside of the Multi-Habitat Planning Area (MHPA) and compliance with the Biological Resources Guidelines requiring mitigation for habitat. A Planned Development Permit (PDP) is proposed that would allow for the religious assembly use within the RS-1-7 zone and would also allow approval of deviations from the development regulations of the zone. As described in Section 5.1, *Land Use*, the proposed deviations related to the project design features would result in a less-than-significant aesthetic impact, and as such, would not contribute to cumulatively considerable land use consistency impacts.

The project is proposed on an infill vacant site that is surrounded by development and major roads (i.e., Interstate 8 [I-8] and College Avenue) and would not introduce any barriers or project features that could physically divide an established community. The project would not result in land use impacts associated with an inconsistency with airport land use computability, and thus, would not contribute to a cumulative impact associated with airport land use consistency.

The proposed church would be compatible with the City's Noise Element of the General Plan and would not contribute to a cumulative impact regarding land use-noise compatibility. Because the local community is built out and no other current development projects or CPAs are occurring in the project area, the proposed change in allowable use would be a site-specific condition that would not combine with other land use changes in the project area and contribute to cumulative land use impacts. SDSU is proposing campus housing just north of I-8 and west of College Avenue, approximately one mile from the project site. The Adobe Falls campus is designated by the Navajo Community Plan as "Park," but slated for housing in the Campus Master Plan. The housing site is an undeveloped area that is not adjacent to or near the project site. The conversion of undeveloped land to residential use by SDSU would contribute to the land use changes in the community since both projects would involve the development of vacant lands. However, both projects would be implemented in accordance with adopted plans and policies. The project's land use impacts would be less than significant and, therefore, not be considered cumulatively considerable given its consistency with the City's land use plans and policies protecting environmental resources and character of the community. No mitigation is required.

6.1.2 Biological Resources

As described in Section 5.2, *Biological Resources*, the project would result in significant direct and indirect impacts to biological resources, all of which would occur outside of the MHPA. The Multiple Species Conservation Program (MSCP) was designed to compensate for the cumulative loss of biological resources throughout the San Diego region. Projects that conform to the MSCP as specified by the City's MSCP Subarea Plan and implementing ordinances, (i.e., Biology Guidelines and ESL Regulations) are not expected to result in a significant cumulative impact for those biological resources adequately covered by the MSCP. These resources include habitats identified as Tier I through IV and MSCP-Covered species (City of San Diego 2018a). Projects on the SDSU campus, such as the Adobe

Falls housing project, would have to comply with the biological resources mitigation framework in the Campus Master Plan Final EIR (SDSU 2007).

Future development in the City would comply with the City's Subarea Plan by conforming to the MHPA (i.e., the City's MSCP designated regional preserve) Land Use Adjacency Guidelines and Area Specific Management Directives for MSCP-Covered species (if later determined necessary) and by mitigating for significant impacts in accordance with ESL Regulations and the City's Biology Guidelines. Therefore, project development would not contribute to cumulatively significant impacts on sensitive biological resources in the city, and no mitigation for cumulative impacts would be required.

6.1.3 Historical Resources

No known archaeological sites of significance would be impacted by proposed development, as described in Section 5.3, *Historical Resources*. However, historical resources mitigation, in the form of monitoring, would be implemented during construction to avoid or reduce potential impacts to unknown subsurface resources to below a level of significance. Every project impacting undeveloped land that has the potential for unknown archaeological resources would undergo similar reviews in terms of determining the presence of historical (archaeological) resources and potential for unknown buried resources. Similar treatment of potential resources is anticipated for other projects in the city and on the SDSU campus (if applicable) during construction, ensuring no resources are destroyed without appropriate Native American contact. As a result, the project would not result in a cumulatively considerable contribution to the loss of regional historic resources, namely archaeological resources. No mitigation is required.

6.1.4 Noise

The project would result in less-than-significant operational noise impacts related to transportation noise on local roads and parking lot/circulation noise on site. Community-wide increases in transportation noise would occur along local roads and freeways with general population growth in the region. An analysis of the cumulative effects of the project's traffic in combination with existing and future traffic in the project area was performed in the noise impact assessment and memorandum contained in Appendix E (ECORP 2020; ECORP 2021). A project's contribution to a cumulative traffic noise increase could be considered substantial when the combined effect exceeds the perception level (i.e., auditory level increase) threshold or 3.0 decibels (dB) using the A-weighted sound pressure level (dBA). A comparison of the "Cumulative No Project" condition with the "Cumulative Plus Project" condition outlined in Table 5.4-6 was completed in the project-specific noise memorandum. As shown in **Table 6-1, Cumulative Traffic Noise Analysis**, the predicted increase in cumulative traffic noise levels associated with the project and other projects in the community, including the SDSU Adobe Falls housing development, during both the weekday and Sunday conditions would not exceed an increase of 3.0 dBA over cumulative conditions. As such, the project's contribution to increases in cumulative traffic noise in the project area would not be considerable and no mitigation is required.

**Table 6-1
CUMULATIVE TRAFFIC NOISE ANALYSIS**

Roadway Segment	CNEL @ 100 Feet from Roadway Centerline		Difference in CNEL between Cumulative No Project and Cumulative + Project	Cumulatively Significant Impact?
	Cumulative No Project	Cumulative + Project		
North of Del Cerro Boulevard	59.0	59.0	0.0	No
Between Del Cerro Boulevard and I-8 Westbound On-Ramp (adjacent to project site)	60.9	60.9	0.0	No
North of Canyon Crest Drive	Not Analyzed in Weekday	Not Analyzed in Weekday	N/A	N/A
South of Canyon Crest Drive	Not Analyzed in Weekday	Not Analyzed in Weekday	N/A	N/A
I-8 Westbound Off-Ramp (toward College Avenue)	61.4	61.4	0.0	No
I-8 Westbound	63.8	63.8	0.0	No
I-8 Eastbound	65.2	65.2	0.0	No
I-8 Eastbound Off-Ramp (toward College Avenue)	Not Analyzed in Weekday	Not Analyzed in Weekday	N/A	N/A
East of College Avenue	52.1	52.1	0.0	No
West of College Avenue	48.6	48.9	0.3	No
North of Del Cerro Boulevard	57.5	57.6	0.1	No
Between Del Cerro Boulevard and I-8 Westbound On-Ramp (adjacent to project site)	59.3	60.0	0.7	No
North of Canyon Crest Drive	62.1	62.2	0.1	No
South of Canyon Crest Drive	60.6	60.6	0.0	No
I-8 Westbound Off-Ramp (toward College Avenue)	62.2	62.2	0.0	No
I-8 Westbound	62.8	63.8	1.0	No
I-8 Eastbound	62.7	63.9	1.2	No
I-8 Eastbound Off-Ramp (toward College Avenue)	58.0	60.6	0.4	No
East of College Avenue	51.8	51.9	0.1	No
West of College Avenue	45.9	46.3	0.4	No

Source: ECORP 2021

Construction activities associated with the project would occur on an infill location not near any other construction projects in the area. Construction noise impacts primarily affect the areas immediately adjacent to a construction site and only during such activities. Although the project would have significant construction noise impacts on nearby sensitive receptors, which would require mitigation to comply with the City's Noise Ordinance limit, no other construction activities are anticipated in the project area at the same time. Therefore, the project's construction activities would not result in cumulatively considerable noise impacts and no mitigation is required.

6.1.5 Visual Effects and Neighborhood Character

Development of the project site would result in changes to the character of the project area, as described in Section 5.5, *Visual Effects and Neighborhood Character*. The analysis determined that the project would not block a designated public view corridor or a public viewing area of a public resource that is considered significant; would provide architectural and visual interest that would offset the exceedance of the building height limits of the RS-1-7 zone and retaining walls heights in the Land Development Code; would not strongly contrast with the surrounding development; would not impact any landmark trees; would not substantially change natural landforms; and would not result in excessive light and glare impacts to adjacent properties or roads. Given its architectural, landscape, and site design features that would minimize the visual effects of the project and its location on an infill vacant site that is surrounded by urban development and major roads, the project's visual impacts would be site-specific and would not combine with other changes to neighborhood character in the local community. The SDSU Adobe Falls campus is situated north of I-8 but farther to the west and at much lower elevation than the project site; thus, changes in visual character associated with both projects would not be collectively visible from the same local public vantage points. Compliance with General Plan Urban Design Element policies, as well as the development regulations in the SDMC, and policies in the Community Plan and in the mitigation framework in the SDSU Campus Master Plan Final EIR would ensure that the project's impacts to visual effects and neighborhood character would not lead to a cumulatively considerable visual impact that is significant. No mitigation is required.

6.1.6 Tribal Cultural Resources

As discussed in Section 5.6, *Tribal Cultural Resources*, the development of the project site has the potential to result in significant impacts associated with unknown subsurface TCRs. As required by Assembly Bill 52 (AB 52), lead agencies are required to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. The project has completed consultation as required by AB 52 and discussed in Section 5.6. The project includes implementation of mitigation, which requires construction monitoring during grading and ground disturbance. This mitigation would reduce project-specific TCR impacts to a less-than-significant level and as such, the project would not contribute to a significant cumulative TCR impact. Other projects in the city and on the SDSU campus would be required to comply with the requirements of AB 52, including implementing mitigation to reduce impacts if the potential for TCR impacts would occur. Therefore, cumulatively significant impacts to TCRs are not anticipated.

Project Boundary

San Diego State University
Adobe Falls Campus



Aerial Photo: USDA NAIP 2020



Figure 6-1
Cumulative Setting

7. OTHER CEQA SECTIONS

7.1 Effects Found Not to Be Significant

California Environmental Quality Act (CEQA) Guidelines Section 15128 requires an Environmental Impact Report (EIR) to contain a statement briefly indicating the reasons that various possible effects of a project were determined not to be significant and were, therefore, not discussed in detail in the EIR. Based upon initial environmental review, the City has determined that the project would not have the potential to cause significant impacts associated with the following 15 issue areas:

- Agriculture and Forestry Resources
- Air Quality
- Energy
- Geologic Conditions
- Greenhouse Gas Emissions
- Health and Safety
- Hydrology
- Mineral Resources
- Paleontological Resources
- Population and Housing
- Public Services and Facilities
- Transportation
- Utilities and Service Systems
- Water Quality
- Wildfire

7.1.1 Agriculture and Forestry Resources

The City Significance Determination Thresholds (2020) state that a significant impact on agricultural resources may result from a project that involves the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use.

The project site is currently vacant. The project site and its surroundings are zoned for residential and other urban uses. The project site and its surroundings are classified as Urban and Built-Up Land by the Farmland Mapping and Monitoring Program (California Department of Conservation 2021), and no mapped farmland is located in close proximity to the project site. No agricultural production is occurring on the project site or surrounding properties. The proposed project would not conflict with existing zoning to protect agricultural resources or require the discontinuation of a Williamson Act Contract. Further, the project site is not zoned for forest land or timber use, nor do any existing forestry uses occur on the project site or in close proximity. No active agricultural activities are located adjacent to or in the vicinity of the project site. Therefore, implementation of the project would not impact agricultural or forestry resources.

7.1.2 Air Quality

The City Significance Determination Thresholds (2020) state that a significant impact on air quality may result from a project if it would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation;

- Expose sensitive receptors to substantial pollutant concentrations;
- Create objectionable odors affecting a substantial number of people;
- Exceed 100 pounds per day of particulate matter (PM) dust; and/or
- Result in a substantial alternation of air movement in the area of the project.

The San Diego Air Pollution Control District (SDAPCD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the San Diego Air Basin (SDAB) is in nonattainment. The SDAPCD and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. Strategies to achieve these emissions reductions are developed in the Regional Air Quality Strategy (RAQS) and State Implementation Plan (SIP), prepared by SDAPCD for the region. The County RAQS was initially adopted in 1991 with the most recent update completed in 2016 (SDAPCD 2016). The RAQS outlines the SDAPCD's plans and control measures designed to attain the state air quality standards for ozone. The RAQS relies on information from the California Air Resources Board (CARB) and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in San Diego County and the cities in the county, to project future emissions and then determine the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by San Diego County and the cities in the county as part of the development of their general plans.

As such, projects that propose development that is consistent with the growth anticipated by local plans would be consistent with the RAQS. However, if a project proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might be in conflict with the RAQS and may contribute to a potentially significant cumulative impact on air quality. Population growth is typically associated with the construction of residential units or large employment centers.

In addition to impacts from criteria pollutants, project impacts may include emissions of pollutants identified by the State and federal government as toxic air contaminants (TACs) or hazardous air pollutants (HAPs). If a project has the potential to result in emissions of any TAC or HAP that may expose sensitive receptors to substantial pollutant concentrations, the project would be deemed to have a potentially significant impact.

The City of San Diego Significance Determination Thresholds (2020) has adopted emission thresholds based on the thresholds for an Air Quality Impact Assessment in the SDAPCD's Rule 20.2. These thresholds are shown in **Table 7-1, Significance Criteria for Air Quality Impacts**. For CEQA purposes, these screening level thresholds can be used to determine if a project's total emissions would result in a significant impact associated with air quality or health risk.

**Table 7-1
SIGNIFICANCE CRITERIA FOR AIR QUALITY IMPACTS**

Pollutant	Emission Rate		
	lbs/Hr	lbs/Day	Tons/Year
Criteria Pollutants			
Carbon Monoxide (CO)	100	550	100
Oxides of Nitrogen (NO _x)	25	250	40
Respirable Particulate Matter (PM ₁₀)	—	100	15
Oxides of Sulfur (SO _x)	25	250	40
Lead and Lead Compounds	—	3.2	0.6
Fine Particulate Matter (PM _{2.5})	—	67	10
Volatile Organic Compounds (VOCs) ^a	—	137	15
Risk Type	Threshold Limit		
Health Risk – Toxic Air Contaminants			
30-Year Residential Cancer	10 in one million		
Non-Cancer Chronic Risk	1.0 Health Hazard Index		
Non-Cancer Acute Risk	1.0 Health Hazard Index		

Source: City of San Diego 2020; SDAPCD 2019.

^a VOC threshold based on South Coast Air Quality Management District levels, which have similar federal and state attainment status as San Diego.

With regard to evaluating whether a project would have a significant impact on sensitive receptors, air quality regulators typically define sensitive receptors as schools (i.e., preschool to 12th grade), hospitals, resident care facilities, daycare centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. SDAPCD issued supplemental health risk assessment (HRA) guidance in June 2015. The methodologies are presented in the SDAPCD's Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments, California Air Pollution Control Officers Association (CAPCOA) Guidance Document, Health Risk Assessments for Proposed Land Use Projects (CAPCOA 2009), and the Office of Environmental Health Hazard Assessment (OEHHA) March 2015 Guidance Manual. Construction activities for the project were evaluated with regard to the standards in the SDAPCD guidance.

With regard to odor impacts, a project that proposes a use that produces objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of off-site receptors. The impacts associated with construction and operation of the project were evaluated for significance based on these significance criteria.

Impacts regarding fugitive dust would be significant if the project would result in the generation of 100 pounds or more on a daily basis.

Per the City's Significance Determination Thresholds, impacts regarding air movement would be significant if the project results in a substantial alteration of air movement in the area of the project.

The following discussion is based on the Air Quality Technical Study and Screening Health Risk Assessment prepared for the project by BlueScape Environmental (BlueScape Environmental 2021). A copy of the report is included as **Appendix G, Air Quality Technical Study and Screening Health Risk Assessment**, to this EIR.

7.1.2.1 Consistency with Regional Air Quality Strategy

The project would construct a church and parking structure, which would require an amendment to the Community Plan and a Planned Development Permit (PDP) to allow such a use on a residentially zoned property. Under the existing land use designations in the Navajo Community Plan and RS-1-7 zone, the project site can build up to 52 single-family residences, assuming a 5,000-square-foot (SF) lot minimum over the approximately 6-acre site. The project would produce less traffic on an average weekly basis than a residential use that would be consistent with the existing zoning for the project site. The amount of mobile and area source emissions produced by the project would be the same or less than the maximum emissions associated with a residential use of the site. While the project would require a Community Plan Amendment (CPA) to add “church” use to the Other Community Facilities figure in the Navajo Community Plan and a PDP, development of the site with the proposed institutional use would not be more intense from an emissions perspective than the residential use allowed under the existing zoning. Therefore, the project would be consistent with the growth anticipated by local plans, consistent with the underlying growth forecasts used in the development of the RAQS, and would not obstruct implementation of the RAQS. Less than significant impacts would result.

7.1.2.2 Violation of an Air Quality Standard

Construction. Construction of the project would generate temporary criteria pollutant and diesel particulate matter (DPM) emissions, primarily from operation of construction equipment on site and from vehicles transporting construction workers to and from the site. DPM emissions are discussed in more detail in Section 7.1.2.3 below. Construction equipment used for site preparation and grading typically generate the highest quantity of emissions. Construction emission calculations were based on the worst-case assumption that construction would commence as early as January 2022, with a duration of 12 months. A later construction start date and longer duration would yield lower emissions levels. Emissions from the construction of the project were estimated using the CalEEMod model version 2020.4.0 (BlueScape Environmental 2021). **Table 7-2, Estimated Maximum Daily Construction Emissions**, and **Table 7-3, Estimated Maximum Annual Construction Emissions**, provides the detailed daily and annual construction emission estimates, respectively, as calculated with the CalEEMod model. Construction emission calculations assumed water of exposed areas would occur up to three times per day, in accordance with the City's Grading Ordinance. Additional assumptions utilized in the construction emissions calculations included the use of Tier 4 engine standards for all construction equipment rated at 100 horsepower or more, and adjustments to select equipment default hours to be more consistent with the overall building phase scenario (refer to Appendix G for additional details regarding modeling assumptions). Watering of exposed areas three times a day and the use of Tier 4 engines would be a condition of approval on the project's grading permit.

Table 7-2
ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS

Construction Phase	Maximum Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2022 Maximum Day	14.2	49.5	32.6	0.22	12.7	5.76
<i>City of San Diego Screening Thresholds</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
Threshold Exceeded	No	No	No	No	No	No

Source: BlueScape Environmental 2021.

Notes: See Appendix G for CalEEMod ver. 2020.4.0 computer model output for the construction emission estimates for the proposed development; the higher value of summer or winter, daily emissions, incorporating project design features to minimize emissions, are shown.

VOC= volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = oxides of sulfur; PM₁₀ = respirable particulate matter; PM_{2.5} = fine particulate matter.

Table 7-3
ESTIMATED MAXIMUM ANNUAL CONSTRUCTION EMISSIONS

Construction Phase	Maximum Emissions (tons/year)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2022 Annual	0.24	0.84	2.22	0.005	0.17	0.079
<i>City of San Diego Screening Thresholds</i>	<i>15</i>	<i>40</i>	<i>100</i>	<i>40</i>	<i>15</i>	<i>10</i>
Threshold Exceeded	No	No	No	No	No	No

Source: BlueScape Environmental 2021.

Notes: See Appendix G for CalEEMod ver. 2020.4.0 computer model output; annual emissions shown.

VOC= volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = oxides of sulfur; PM₁₀ = respirable particulate matter; PM_{2.5} = fine particulate matter.

As shown in Tables 7-2 and 7-3, construction of the project would not exceed the City's CEQA construction emission thresholds for daily or annual emissions of volatile organic compounds (VOC), oxides of nitrogen (NO_x), carbon monoxide (CO), oxides of sulfur (SO_x), respirable particulate matter (PM₁₀), or fine particulate matter (PM_{2.5}). As such, air quality impacts from project-related construction activities would be less than significant.

Operations. Operational emissions include emissions from electricity consumption (energy sources), vehicle trips (mobile sources), area sources, landscape equipment, and evaporative emissions as the structures are repainted over the life of the project. The majority of operational emissions are associated with vehicle trips to and from the project site. Operational emissions calculations assumed the first year of project operation would be 2023.

Project design features applied in the CalEEMod model for operational emissions calculations included the use of architectural coatings that meet SDAPCD Rule 67.0.1 standards, current Title 24 Building Standards, low flow water fixtures and water-efficient irrigation systems, and a 50 percent reduction in solid waste to meet California's existing waste diversion requirements. These project design features would be included as part of project conditions of approval. **Table 7-4, Estimated Daily Operational Emissions**, and **Table 7-5, Estimated Annual Operational Emissions**, summarizes daily and annual emissions, respectively, associated with the operation of the project.

Table 7-4
ESTIMATED DAILY OPERATIONAL EMISSIONS

Proposed Project	Estimated Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area	1.27	<0.001	0.013	<0.001	<0.001	<0.001
Energy	0.019	0.169	0.142	0.001	0.013	0.013
Mobile	4.38	3.77	31.4	0.055	5.49	1.49
Daily Total	5.67	3.94	31.5	0.056	5.50	1.50
<i>SDAPCD Thresholds</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
Threshold Exceeded?	No	No	No	No	No	No

Source: BlueScape Environmental 2021.

Note: See Appendix G for CalEEMod ver. 2020.4.0 computer model output; the higher value of summer or winter, daily emissions, incorporating project design features to minimize emissions, are shown.

VOC= volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = oxides of sulfur; PM₁₀ = respirable particulate matter; PM_{2.5} = fine particulate matter.

Table 7-5
ESTIMATED ANNUAL OPERATIONAL EMISSIONS

Proposed Project	Estimated Emissions (tons/year)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area	0.23	<0.001	0.001	<0.001	<0.001	<0.001
Energy	0.003	0.031	0.026	<0.001	0.002	0.002
Mobile	0.20	0.18	1.47	0.003	0.26	0.07
Annual Total	0.43	0.21	1.49	0.003	0.26	0.07
<i>SDAPCD Thresholds</i>	<i>15</i>	<i>40</i>	<i>100</i>	<i>40</i>	<i>15</i>	<i>10</i>
Threshold Exceeded?	No	No	No	No	No	No

Source: BlueScape Environmental 2021.

Note: See Appendix G for CalEEMod ver. 2020.4.0 computer model output; annual emissions, incorporating project design features to minimize emissions, are shown.

VOC= volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = oxides of sulfur; PM₁₀ = respirable particulate matter; PM_{2.5} = fine particulate matter.

As shown in Tables 7-4 and 7-5, the project's estimated daily and annual operational emissions would not exceed the SDAPCD thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. Therefore, the project would not result in regional air quality impacts (including impacts related to criteria pollutants and violations of air quality standards). Impacts would be less than significant.

The nonattainment status of regional pollutants is a result of past and present development within the SDAB, and this regional impact is cumulative rather than attributable to any one source. A project's emissions may be individually limited, but cumulatively considerable when taken in combination with past, present, and future development projects. The thresholds of significance are relevant to whether a project's individual emissions would result in a cumulatively considerable incremental contribution to the existing cumulative air quality conditions. If a project's emissions

would be less than those threshold levels, the project would not be expected to result in a considerable incremental contribution to the significant cumulative impact.

As discussed above, the project would not result in the generation of criteria air pollutant emissions that would exceed the SDAPCD thresholds adopted by the City for construction and operational activities; therefore, it would not contribute a considerable amount of criteria air pollutant emissions to the region's emissions profile and would not impede attainment and maintenance of ambient air quality standards.

7.1.2.3 Sensitive Receptors

Emissions of DPM from equipment used to construct the project were analyzed to determine if the health risk impacts to nearby sensitive receptors (including schools, hospitals, daycare, parks, etc.) would exceed the City thresholds (identified in Table 7-1). Additionally, while residential uses are not typically identified as sensitive receptors, this analysis includes an examination of DPM emissions at the residential uses adjacent to the project site. Single-family residential uses are located directly adjacent to the east of the project site and across College Avenue to the west. The nearest school is the Temple Emanu-El preschool situated at 6299 Capri Drive, across College Avenue and approximately 300 feet north of the project site, while Hearst Elementary School is located approximately 0.1 mile northwest of the project site, at 6230 Del Cerro Boulevard. The closest hospital is Alvarado Hospital Medical Center, located south of Interstate 8 (I-8), at 6655 Alvarado Road, approximately 0.4 miles southeast of the project site. Temple Emanu-El preschool and Hearst Elementary School are the nearest sensitive receptors to the project site.

A screening HRA (BlueScape Environmental 2021) was prepared for the project and is included in Appendix G. Detailed information regarding the assumptions and methodology for the health risk assessment, including assumptions related to the generation of DPM emissions, the modeling software and modeling inputs, and risk calculation methodology are described therein. The health risk assessment calculated cancer risk, chronic risk, and acute risk for resident, child, and school receptor exposures. As explained in more detail in Appendix G, due to the short-term construction period and the sensitivity of the youngest age groups (third trimester pregnancy and 0–2 years) to cancer risk impacts, the analysis of health risks for the younger age groups provides the most conservative estimate of cancer risk health impacts. Thus, the younger age groups were used to calculate the cancer risk impacts, even though these age groups would not be present at the elementary school (which typically has children ages 5–12).

Table 7-6, Screening Health Risk Assessment Results, Diesel Particulate Matter Due to Construction, identifies the calculated cancer risk, non-cancer chronic risk, and acute risk impacts at the Maximally Exposed Individual (MEI) for residents in the vicinity of the project site and for the Temple Emanu-El preschool and Heart Elementary School, which are the nearest schools to the project site.

As shown in Table 7-6, the health risk impacts from construction DPM would not exceed the SDAPCD CEQA significance thresholds adopted by the City. Therefore, the project's construction-related health risk impacts at the nearest sensitive receptors, including residents adjacent to the project site, Temple Emanu-El preschool, and Hearst Elementary School, would be less than significant.

Table 7-6
SCREENING HEALTH RISK ASSESSMENT RESULTS, DIESEL PARTICULATE MATTER DUE TO CONSTRUCTION

Risk Type	Receptor Type	UTM Location (meters)	Risk Results	Significance Threshold	Exceeds Threshold?
Cancer Risk	Resident, Child	Rec. # 1273 494112.50; 3627012.50	9.70 in one million	10 in one million	No
	School (Temple Emanu-El Preschool)	Rec # 1587 494087.50; 3627162.50	1.02 in one million		No
	School (Hearst Elementary)	Rec # 1747 494037.50; 3627237.50	0.29 in one million		No
Chronic Risk	Resident, Child	Rec. # 1273 494112.50; 3627012.50	0.14	1.0 Health Hazard Index	No
	School (Temple Emanu-El Preschool)	Rec # 1587 494087.50; 3627162.50	0.001		No
	School (Hearst Elementary)	Rec # 1747 494037.50; 3627237.50	0.0004		No
Acute Risk	Resident, Child	Rec. # 2797 494121.36; 3627047.71	0.15	1.0 Health Hazard Index	No
	School (Temple Emanu-El Preschool)	Rec # 1587 494087.50; 3627162.50	0.05		No
	School (Hearst Elementary)	Rec # 1747 494037.50; 3627237.50	0.028		No

Source: BlueScape Environmental 2021.

Note: UTM = Universal Transverse Mercator

7.1.2.4 Odors

The project may temporarily produce odors during construction activities resulting from construction equipment exhaust, application of asphalt, and/or the application of architectural coatings; however, standard construction practices would minimize the odor emissions and their associated impacts. Furthermore, odors emitted during construction would be temporary, short-term, and intermittent in nature, would cease upon the completion of the respective phase of construction, and generally occur at magnitudes that would not affect a substantial number of people. As the project consists of an institutional use, no operational odor sources are proposed. Accordingly, the project would not create objectionable odors affecting a substantial number of people during construction, and short-term impacts would be less than significant.

7.1.2.5 Particulate Matter

As discussed in Section 7.1.2.2 above, the project would not result in emissions of particulate matter in excess of SDAPCD established thresholds. Estimated maximum daily construction emissions of particulate matter are 12.7 pounds of PM₁₀ and 5.76 pounds of PM_{2.5}. Estimated daily operational

emissions of particulate matter are 5.5 pounds of PM₁₀ and 1.5 pounds of PM_{2.5}. Thus, as demonstrated in Tables 7-2 and 7-4, the project would not result in the emissions exceeding 100 pounds per day of particulate dust. Impacts would be less than significant.

7.1.2.6 Air Movement

Air movement impacts are typically associated with the placement of high structures in proximity to one another that can result in the tunneling of air movement. The pitched roof towers of the building would extend from 45 to up to 48 feet above grade and the rooftop extension (i.e., cross) would extend an additional 8 feet above the 45-foot-high tower, for a total structure height of 53 feet above grade. The roof-top deck of the structured parking garage would be at grade with College Avenue. The project does not propose multiple high structures, nor is it located in an area that has existing multiple high structures. Adjacent land uses consist of a residential neighborhood, with nearby commercial and institutional uses (a temple and school), none of which are high profile or large structures that would contribute to air movement impacts. Air movement and air flow patterns would not be substantially altered as a result of the project and impacts would be less than significant.

7.1.3 Energy

Pursuant to CEQA Guidelines Appendix F, energy conservation impacts were analyzed by estimating project energy requirements by amount and type, then evaluating project compliance with energy regulatory requirements. These data were used to evaluate the project's effects on energy resources and the degree to which the project would comply with existing energy standards. A project may result in a significant energy impact if it meets one or more of the following criteria:

- If the project would result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation; and/or
- If the project would conflict with or obstruct a state of local plan for renewable energy or energy efficiency.

The analysis included in this section uses the CalEEMod Version 2020.4.0 results from the project's Climate Action Plan (CAP) Consistency Checklist Appendix to evaluate energy impacts (refer to **Appendix B**).

7.1.3.1 Energy Usage

Construction. Temporary electrical power would be needed during construction activities. Electricity demand during construction is limited, and generally includes demand for lighting and electronic equipment, such as computers inside temporary construction trailers. Electricity for construction would be provided by San Diego Gas & Electric (SDG&E). The amount of electricity used during construction would be minimal and associated with the use of construction trailers that are used by managerial staff during the hours of construction activities, and electricity associated with powered hand tools.

The largest source of energy consumption during project construction would be from petroleum-based fuels. Fuel consumed by construction equipment would be the primarily energy resource expended over the course of construction, while transportation of construction materials and construction worker commutes would also result in petroleum-based fuel consumption. Heavy-duty equipment and haul trucks involved in hauling materials during project construction would rely on diesel fuel. In contrast, construction workers would travel to and from the project site in gasoline-powered passenger vehicles. There would be no unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities or use of equipment that would not conform to current emissions standards (and related fuel efficiencies).

Both types of energy used during construction of the project would be limited to the construction period and would not involve long-term electrical or petroleum use. As such, energy consumption during construction activities would not be considered excessive, inefficient, or unnecessary.

Operations. The California Energy Commission reported SDG&E electrical demand for all uses in 2019 was 17,720.76 million kilowatt-hours (kWh) (California Energy Commission 2021). The project would generate the demand for approximately 569,882 kWh/year of electricity use (CalEEMod run by BlueScape Environmental 2021; see CAP Consistency Checklist, Appendix B). This equals approximately 3/1,000th of 1 percent of the total energy demand reported by SDG&E in 2019. Electricity use at the project would not be excessive, would be commensurate with the proposed use, and would not result in a substantial increase in regional consumption. The project would adhere to Title 24 requirements and the City's CAP and would incorporate several measures directed at minimizing energy use, including cool/green roofs; electric vehicle charging stations; designated and secure bicycle parking spaces; designated parking spaces for low-emitting, fuel-efficient, and carpool/vanpool vehicles; and implementation of a solid waste recycling plan.

Natural gas would be directly consumed throughout the operation of the project, primarily through building and water heating. Natural gas consumption was estimated for the project based on the CalEEMod default values. The California Energy Commission reported natural gas demand in 2019 for SDG&E for all uses to be 533.9 million therms (California Energy Commission 2021), or 5.339 billion kBtu (1 therm is equivalent to approximately 10 thousand British thermal units [kBtu]). The project is estimated to consume approximately 627,564 kBtu of natural gas per year during operations (CalEEMod run by BlueScape Environmental 2021; see CAP Consistency Checklist, Appendix B). This represents approximately 0.01 percent of total consumption of natural gas by SDG&E for all uses in 2019. In addition, the project would be designed to comply with California Code of Regulations (CCR) Title 24, Part 6, as well as the City's CAP. As such, the project's long-term demand for natural gas would be commensurate with the planned residential land use, would not be substantial, and would not cause the use of large amounts of natural gas in a manner that is wasteful or otherwise inconsistent with adopted plans or policies.

Operational petroleum usage would be attributable to the additional vehicles that would be associated with on-site employees and attendees to various small groups at the facility during weekdays, and with employees, volunteers, and church attendee vehicle trips on weekends. As noted under Section 7.1.12, *Transportation*, the project is expected to generate an increase above existing levels of 280 average daily trips (ADT) during weekdays, and an increase above existing levels of 1,976 ADT during Sundays (**Appendix J**; LOS Engineering 2022). Although the project would result in an increase in petroleum use during operation compared to the existing conditions,

project-specific petroleum use would be expected to diminish over time as fuel efficiency improves and as a result of the project's proximity to transit connections, bicycle infrastructure, and pedestrian facilities (i.e., sidewalks).

Given the above considerations with regard to all sources of energy usage, operation of the project would not result in the use of excessive, wasteful, or inefficient amounts of electricity, natural gas, or petroleum and would not result in the need to develop additional sources of energy.

7.1.3.2 Energy Efficiency Policy Compliance

The federal, state, and local regulatory plans and policies regarding energy efficiency aim to reduce energy demand, impose emission caps on energy providers, establish minimum building energy and green building standards, transition to renewable non-fossil fuels, incentivize homeowners and builders, fully recover landfill gas for energy, and expand research and development. In accordance with CARB's Scoping Plan, the project includes sustainable building practices, such as the following features:

- Cool/green roofs
- Use of low-flow fixtures/appliances and low-flow irrigation
- Electrical vehicle charging stations
- Designated and secure bicycle parking spaces
- Designated parking spaces for low-emitting, fuel-efficient, and carpool/vanpool vehicles
- Implementation of a solid waste recycling plan

Additionally, the project would be required to include all mandatory green building measures under the California Green Building Standards (CALGreen) Code, and as specified in the CAP Consistency Checklist prepared for the project (refer to Appendix B to this EIR). Therefore, the project would be consistent with the CARB Scoping Plan measures through incorporation of stricter building and appliance standards.

The project is consistent with General Plan concepts such as increased walkability, enhanced pedestrian networks, and proximity to transit through the provision of pedestrian and bicycle-friendly components. These include the provision of new bicycle lane signage and striping, a 12-foot shared (for pedestrians and bicycles) contiguous sidewalk south of the project driveway, a 5-foot non-contiguous sidewalk north of the driveway, and the provision of bicycle parking and storage. The project would implement a waste management plan (WMP) directed at diverting solid waste, supporting the use of recycled materials, and promoting on-site recycling in accordance with citywide ordinances.

The project is consistent with the CAP as demonstrated in the project's CAP Consistency Checklist. Each of the applicable CAP strategies would be implemented by the project, including sustainable development features and green building practices. Refer to additional discussion under Section 7.1.5, *Greenhouse Gas Emissions*. Thus, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No significant adverse environmental effects would result from the adoption of the project in terms of plan consistency or policy conflicts.

7.1.4 Geologic Conditions

Based on the City's Significance Determination Thresholds (2020), a project may result in a significant geologic hazards impact if it meets one or more of the following criteria:

- If the project would expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards;
- If the project would result in substantial increase in wind or water erosion of soils, either on or off the site; and/or
- If the project is 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-project-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

A project-specific geotechnical investigation was prepared for the project (*Updated Preliminary Geotechnical Investigation and Design Recommendations, Proposed Church Facility, APN 463-010-100, San Diego, California, 90212*, Advanced Geotechnical Solutions, Inc. 2020a). The results of this investigation are presented in this section. The complete preliminary geotechnical investigation report is contained in **Appendix F** to this EIR. The project site is located within the westernmost portion of the Peninsular Ranges Geomorphic Province of California, in an area underlain by younger marine and non-marine sedimentary rocks. A majority of the project site is mantled with pre-existing undocumented fill soils, locally underlain by young alluvium and older alluvium where a pre-development drainage was filled in (based on a review of historic aerials, the drainage was filled during grading activities in the mid- to late-1960s). The fill and alluvial soils are underlain to maximum depths explored by Tertiary-aged Stadium Conglomerate and Cretaceous-age Santiago Peak Volcanics. In addition, the project is mapped in the City's Seismic Safety Study as being in Geologic Hazards Category 52 corresponding to "other level areas, gently sloping to steep terrain, favorable geologic structure, low risk" (City of San Diego 2008b).

7.1.4.1 Unstable Geologic Conditions

Geologic Hazards. Based on a review of published geologic maps and reports, the project site is not located on any known active, potentially active, or inactive fault traces and thus, would not be subject to potential adverse effects associated with the rupture of a known earthquake fault at the project site. The nearest known active surface fault is the Silver Strand section of the Newport-Inglewood-Rose Canyon fault zone, located approximately 7.1 miles southwest of the site. Based on the City's Seismic Safety Study, the project site has favorable geologic structure. In the event of a major earthquake on regional faults or other significant faults in the Southern California and northern Baja California area, the project site could be subjected to moderate to severe ground shaking. With respect to this hazard, the site is considered low risk and comparable to other locations in the general vicinity. Additionally, seismic design of the proposed structures would be performed in accordance with guidelines currently adopted by the City, including California Building Code and seismic design parameters of the Structural Engineers Association of California. Implementation of proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, would ensure that the potential for impacts associated with seismic ground shaking would be reduced to an acceptable level of risk. Therefore, impacts would be less than significant.

Liquefaction/Spreading/Subsidence. As noted previously, the project site is located within Geologic Hazards Zone 52 on the City's Seismic Safety Study Geologic Hazards Map, which is characterized as areas with favorable geologic structure and low risk. The project site is underlain by Santiago Peak Volcanics that consist of moderately hard to hard, metavolcanic bedrock and Stadium Conglomerate that consists of moderately hard, cobble conglomerate with a silty sandstone matrix. These geologic units are not susceptible to seismically induced liquefaction or settlement. Based on the dense nature of the formational materials underlying the site, the lack of a shallow groundwater table, and the proposed remedial grading associated with project construction that would remove loose, sandy soils from the site, the potential for seismically induced liquefaction is considered remote. Additionally, the susceptibility to earthquake-induced dynamic settlement is considered to be remote due to the presence of well consolidated/indurated formational materials underlying the site and the aforementioned removal of loose, sandy soils during remedial grading at the project site. Due to the dense underlying materials present at the project site, the potential for unstable geologic conditions, such as subsidence or lateral spreading is low. Proper engineering design and utilization of standard construction practices would ensure that impacts resulting from unstable geologic conditions, such as liquefaction, settlement, subsidence, or lateral spreading would not occur. Therefore, no seismic-related ground failure is anticipated on site and no impact would occur.

Landslides. No landslides or indications of deep-seated landsliding were observed at the site during field observations or during review of published geologic maps. The nearest known landslide is approximately 0.75 miles west of the project within exposures of Friars Formation, which are not present at the project site. Therefore, the risk to people or structures associated with a landslide hazard does not exist and no impact would occur.

Seiches. Seiches are periodic oscillations in large bodies of water such as lakes, harbors, bays, or reservoirs. The risk potential for damage to the project site caused by seiches is low due to the project's distance from large bodies of water. The risk to people or structures associated with inundation hazards caused by seiche is low. Therefore, impacts would be less than significant.

Unstable Soils. Due to the dense underlying materials present at the project site, the potential for unstable geologic conditions that would potentially result in on- or off-site impacts is low. Additionally, soil types at the project site consist of Diablo-Urban Land Complex and Sandy Loam, which are not considered expansive soils. The project, in accordance with the recommendations of the geotechnical investigation, would remove unsuitable soils (artificial fill, young alluvium, and weather older alluvium/bedrock) and the proposed structures would be placed on compacted fill overlying competent Older Alluvium, Stadium Conglomerate, or Santiago Peak Volcanics. Therefore, the risk associated with unstable soils, including expansive soils would be avoided.

Based on the discussion above, the project would not expose people or property to potentially substantial effects including the risk of life, injury, or death resulting from hazards such as earthquakes and seismic shaking, liquefaction, spreading, subsidence, landslides, unstable soils, or similar hazards. The project would incorporate geotechnical recommendations based on the site-specific geotechnical report, would incorporate proper engineering design and standard construction practices consistent with applicable regulatory requirements. As such, impacts associated with geologic hazards would be less than significant.

7.1.4.2 Soil Erosion

As presented in Section 7.1.7, *Hydrology*, and Section 7.1.14, *Water Quality*, drainage for the site would be adequately controlled through the implementation of best management practices (BMPs) during construction and operation such that substantial runoff would not occur. In the future, the project site would be developed with structures, hardscape, and landscaping. No soil would be exposed that could be subject to wind or water erosion. Therefore, the project would not result in a substantial increase in wind or water erosion, and less-than-significant impacts would occur.

7.1.5 Greenhouse Gas Emissions

According to the California Natural Resources Agency, “due to the global nature of greenhouse gas (GHG) emissions and their potential effects, GHG emissions will typically be addressed in a cumulative impacts analysis.” According to CEQA Guidelines Appendix G, the following criteria may be considered to establish the significance of global climate change for a project:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or
- Conflict with the City’s CAP or an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

As discussed in CEQA Guidelines Section 15064.4, the determination of the significance of GHG emissions calls for a careful judgment by the lead agency, consistent with the provisions in Section 15064. Section 15064.4 further provides that a lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:

- (1) Use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use. The lead agency has discretion to select the model or methodology it considers most appropriate, provided it supports its decision with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use; and/or
- (2) Rely on a qualitative analysis or performance-based standards.

Section 15064.4 also advises a lead agency to consider the following factors, among others, when assessing the significance of impacts from GHG emissions on the environment:

- (1) The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;
- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
- (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

In December 2015, the City adopted a CAP that outlines the actions that the City will undertake to achieve its proportional share of state GHG emission reductions (City of San Diego 2015a). The CAP is a qualified plan for the reduction of GHG emissions, in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP. In July 2016, the City adopted the CAP Consistency Checklist to provide a streamlined review process for the analysis of potential GHG impacts from proposed new development; checklist revisions were then implemented in July 2017. The CAP Consistency Checklist requires a three-step review of the project to determine consistency with the GHG projections and programs outlined in the City's CAP. For the applicable steps, the project has been found to be consistent with the CAP (Baranek Consulting Group 2021). The following summarizes that determination based on the various items included in the project's CAP Consistency Checklist (Appendix B to this EIR).

The project site is designated in the Navajo Community Plan for Residential land use and is zoned Residential (RS-1-7). The designation is for Very Low/Low Residential use at a density range of 0 to 9 dwelling units (DU) per acre. With minimum 5,000 SF lots, as allowed in the RS-1-7 zone, the project site could be developed with maximum construction of up to 52 DU on the approximately 6-acre site. The Navajo Community Plan does not provide a separate land use designation for churches or places of religious assembly. Instead, these types of community facilities are identified as "Church" on the Other Community Facilities map (Figure 24) of the Navajo Community Plan. The project requires approval of a CPA to add "Church" use to the Other Community Facilities map in the Navajo Community Plan, similar to other religious institutions in the community. The proposed CPA would retain the Residential land use designation and identify the site for Institutional (Church) uses. No rezone is proposed because churches are a permitted use in the RS-1-7 zone. With regard to Step 1 of the CAP Consistency Checklist, a quantification of estimated project emissions was prepared, using the CalEEMod v2020.4.0 model, to evaluate whether the project would result in equivalent or less GHG emissions than assumed in the CAP. State and federal GHG measures were assumed in the calculations consistent with the regulatory assumptions in the CAP, including 2019 Building Efficiency Standards, under Title 24; Pavley I, Low Carbon Fuel Standard, and advanced Clean Cars standards; and the City's goal of 50 percent solid waste diversion through recycling and waste reduction programs (refer to the Appendix B to this EIR for additional details regarding modeling assumptions).

Table 7-7, *Estimated Operational Greenhouse Gas Emissions, Planned Land Use Designation and Zoning – 52 Single-Family Homes*, and **Table 7-8**, *Estimated Operational Greenhouse Gas Emissions, Proposed Land Use Designation and Zoning – All Peoples Church Project*, summarize the estimated GHG emissions with the existing and proposed land use designations and zoning, respectively.

As shown in Tables 7-7 and 7-8, the project would result in annual operational GHG emissions that are lower than levels that would occur under the planned land use designation/zoning assumed in the CAP by 156.79 metric tons per year of carbon dioxide equivalent (CO₂e). The site's annual vehicle miles traveled (VMT) would be reduced by approximately 459,305 miles as compared to the planned land use designation/zoning assumed in the CAP. Therefore, the project would result in equivalent or less GHG emissions than assumed in the CAP compared to the planned land use and zoning and meets the requirements of Step 1 of the CAP Consistency Checklist.

Table 7-7
ESTIMATED OPERATIONAL GREENHOUSE GAS EMISSIONS PLANNED LAND USE DESIGNATION AND ZONING – 52 SINGLE-FAMILY HOMES

Emission Source	Annual Emissions (Metric tons/year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Operational Emissions				
Area Sources	76.87	0.05	0.004	79.38
Energy	159.67	0.007	0.002	160.40
Mobile Source	481.81	0.03	0.02	489.34
Solid Waste	6.20	0.37	0.00	15.36
Water Use	14.96	0.09	0.002	17.84
Construction Emissions (Amortized Over 20 Years)				
Construction Sources	13.52	0.003	0.00	13.62
Total	753.03	0.55	0.03	
TOTAL CO₂e Emissions				775.94

Source: CalEEMod run by BlueScape Environmental (2021); see Appendix B.

Note: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent.

Table 7-8
ESTIMATED OPERATIONAL GREENHOUSE GAS EMISSIONS PROPOSED LAND USE DESIGNATION AND ZONING – ALL PEOPLES CHURCH PROJECT

Emission Source	Annual Emissions (Metric tons/year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Operational Emissions				
Area Sources	0.002	0.00	0.00	0.002
Energy	173.07	0.01	0.002	173.79
Mobile Source	334.47	0.03	0.02	337.91
Solid Waste	31.52	1.86	0.00	78.09
Water Use	11.59	0.05	0.001	13.06
Construction Emissions (Amortized Over 20 Years)				
Construction Sources	16.12	0.003	0.00	16.30
Total	563.77	1.95	0.02	
TOTAL CO₂e Emissions				619.15

Source: CalEEMod run by BlueScape Environmental (2021); see Appendix B.

Note: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent

With regard to Step 2 of the CAP Consistency Checklist, the project design would comply with the GHG reduction strategies in the CAP by featuring the following, as described in Chapter 3, *Project Description*, and would be included as part of project conditions of approval:

- Cool/green roofs
- Use of low-flow fixtures/appliances and low-flow irrigation
- Electrical vehicle charging stations
- Designated and secure bicycle parking spaces
- Designated parking spaces for low-emitting, fuel-efficient, and carpool/vanpool vehicles
- Implementation of a solid waste recycling plan

A Step 3 conformance evaluation is not required because the project does not require a land use designation amendment (i.e., the project site would remain in the residential land use designation), and Step 1 demonstrates the project would be consistent with the General Plan and the Navajo Community Plan.

Therefore, the project would be consistent with projected GHG emissions and GHG reduction strategies outlined in the City's CAP, or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of GHGs. The project would not result in a significant impact relative to plans, policies, or regulations aimed at reducing GHG emissions. Impacts would, therefore, be less than significant.

7.1.6 Health and Safety

The City Significance Determination Thresholds (2020) require that the environmental review process include steps to disclose and address the safe removal, disposal, and/or remediation of hazardous materials in conformance with applicable federal, state, and local government standards. The City Significance Determination Thresholds also identify potential public safety/public health issues associated with projects that are: (1) located within and/or in close proximity to airports, flood-prone areas, or areas susceptible to brush fires; (2) susceptible to disease-carrying vector exposure, sewage spills, or electromagnetic field effects associated with electric transmission lines and communications facilities; and (3) in proximity to former or active underground storage tank sites, fuel-storage tank farms, sewage treatment plants, or areas where toxic chemicals may be stored. Based on the City's Significance Determination Thresholds (2020), a project may result in a significant health and safety impact if the project would:

- Expose people to toxic substances, such as pesticides and herbicides, some of which have long-lasting ability, applied to the soil during previous agricultural uses;
- Result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school;
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment;

- Impair implementation of, or physically interfere with an adopted emergency plan or emergency evacuation plan;
- Result in a safety hazard for people residing or working within two miles of a private airstrip or a private airport or heliport facility that is not covered by an adopted Airport Land Use Compatibility Plan;
- Result in a safety hazard for people residing or working in a designated airport influence area; and/or
- Expose people or structures to significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

7.1.6.1 Construction

Hazardous Materials Usage and Transport. Construction of the project may require the use of hazardous materials (fuels, lubricants, solvents, etc.), which would require proper storage, handling, use and disposal; however, the project would not routinely transport, use or dispose of hazardous materials. Accidental spills, leaks, fires, explosions, or pressure releases involving hazardous materials represent a potential threat to human health and the environment if not properly treated. Accident prevention and containment are the responsibility of the construction contractors, and provisions to properly manage hazardous substances and wastes are typically included in construction specifications. The contractor would be required to comply with applicable local, state, and federal regulations, regarding the use, storage, and disposal of hazardous materials and hazardous wastes. Therefore, adherence to the construction specifications and applicable regulations regarding hazardous materials and hazardous waste, including disposal, would ensure that construction of the project would not create a significant hazard to the public or the environment.

Hazardous materials would not be disposed of or released onto the ground, the underlying groundwater, or any surface water. Totally enclosed containment would be provided for all refuse. With implementation of these construction BMPs, potential impacts from the accidental release of hazardous materials during construction activities would not occur.

7.1.6.2 Operations

Hazardous Materials Usage and Transport. The project is institutional in nature and does not propose the use or transport of any hazardous materials beyond those used for ordinary maintenance and cleaning purposes (e.g., chemical reagents, solvents, fuels, paints, and cleansers). These materials would be used for building and grounds maintenance. Many of the hazardous materials used would be considered household hazardous wastes, common wastes, and/or universal wastes by the U.S. Environmental Protection Agency, which regards these types of wastes to be common to businesses and households and to pose a lower risk to people and the environment than other hazardous wastes when they are properly stored, transported, used, and disposed of. All hazardous materials generated, used, and stored on the project property would be managed in accordance with all relevant federal, state, and local laws, including the California Hazardous Waste Control Law (California Health and Safety Code Division 20, Chapter 6.5) and Hazardous Waste Control Regulations (22 CCR 4.5).

Hazardous Emissions. Given the institutional character of the project, operations would not create any sources of hazardous emissions that could affect the public. The closest schools to the project site are Hearst Elementary School, located approximately 0.1 mile northwest of the project site and a pre-school at Temple Emanu-El, located across College Avenue, approximately 300 feet north of the project site. Although the project site is located within 0.25 miles of two existing schools, as an institutional use with no stationary emissions sources, it would not emit any hazardous substances. Therefore, hazardous materials impacts related to hazardous emissions and the project's proximity to schools would be less than significant.

Listed Hazardous Materials Sites. EnviroStor is an online database search and GIS tool for identifying sites that have known contamination or sites where there may be reasons to investigate further. It also identifies facilities that are authorized to treat, store, dispose, or transfer hazardous waste. Based on review of the online EnviroStor database on the Department Toxic Substances Control website, there are no recorded hazardous materials sites within a mile of the project site (California Department of Toxic Substances Control 2021). Therefore, the project site and its surroundings are not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. and the project would not create a significant hazard to the public or the environment. No impact would occur.

Emergency Evacuation Plans. The City participates in the County's Unified San Diego County Emergency Services Organization and County of San Diego Operational Area Emergency Plan (County of San Diego 2018). Primary evacuation routes consist of the major interstates, highways, and prime arterials within San Diego County. Primary evacuation routes identified in the emergency plan nearest the project site include I-8, which is located just south of the project site, and Interstate 15 (I-15), which is located approximately 3 miles west of the project site. However, as noted in the emergency plan, specific evacuation routes would be determined based on the location and extent of the incident and would include as many predesignated transportation routes as possible (County of San Diego 2018). The project would not impair the implementation of, or physically interfere with, an adopted emergency response plan or evacuation plan. Off-site roadway improvements are proposed along College Avenue at the proposed site entrance. A full access private driveway would be constructed along College Avenue, with a new signalized intersection and turn lanes. Construction activities associated with the project entry would include creating a break and narrowing of the existing raised median, constructing a new southbound left-turn lane, striping of a northbound right-turn lane and installing a crosswalk. A new traffic signal would be installed at the completed intersection. A second private driveway access would also be added in the northern portion of the site, providing an additional access point to the site from College Avenue. An encroachment permit from the City would be required for those improvements. Traffic control would be implemented by the construction contractor (as required by the City) to ensure safe passage through the area while construction is occurring and to make sure emergency access is maintained in the project area. Once complete, the project would not interfere with any emergency response along College Avenue and less-than-significant impacts would occur.

Wildfire Hazard. The project site is surrounded on all sides by urban development, with the exceptions of a 2.0-acre City fee-owned open space dedicated parkland that is situated between I-8 and the project site and adjacent residential neighborhood with no interface with wildlands. Some undeveloped hillsides occur west of College Avenue but are bordered by I-8 to the south and residential development to the west and north (refer to Figure 2-2). According to the City of San

Diego Official Very High Fire Hazard Severity Zone (VHFHSZ) Map No. 20, the project site is located within a “VHFHSZ & 300' Brush Buffer” (City of San Diego 2009). As part of standard development procedures, the proposed development plans would be submitted to the City for review and approval to ensure that adequate emergency access is provided to and from the project site. The project would be constructed to comply with the City's Fire Code and City requirements related to development within the VHFHSZ and would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Less than significant impacts are identified.

Airport Safety Hazards. The project site is located within the Airport Land Use Compatibility Overlay Zone (ALUCOZ) and Airport Influence Area (AIA) for Montgomery Field. Specifically, the project site is located within Review Area 2 of the AIA, which consists of locations within the airspace protection and/or overflight notification areas (County of San Diego 2010). Limits on the heights of structures, particularly in areas of high terrain, is the only restriction on land uses within Review Area 2. Although the project site is located in Review Area 2 for Montgomery Field, the City determined that an Airport Land Use Commission (ALUC) review of the project would be unnecessary because of its topographic location below surrounding land uses and low stature relative to the airspace restrictions. The project would not interfere with the operations of the airport and no associated safety impacts would occur. The project site is not located in the vicinity of a private airstrip, and no safety impacts associated with private airstrips would occur.

7.1.7 Hydrology

According to the City's CEQA Significance Determination Thresholds (2020), a project may result in a significant impact to hydrology if the project would:

- Result in impervious surfaces and associated increased runoff;
- Result in a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes; and/or
- Develop within a 100-year floodplain as identified on Federal Emergency Management (FEMA) maps or impose flood hazards on other properties.

Information for the following discussion is based on the *Preliminary Drainage Study* (Pasco Laret Suiter & Associates 2021) and *Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP)* (Pasco Laret Suiter & Associates 2020), which are included as **Appendix H, Preliminary Drainage Study**, and **Appendix I, Stormwater Quality Management Plan**, of this EIR.

The project site is currently vacant, with no impervious surfaces. The project would result in excavation, grading, and the placement of fill to construct the proposed structures and associated surface parking. Construction of the project would result in approximately 2.46 acres of new impervious areas of the site, which would cover approximately 41 percent of the site. In the current condition, there are no impervious areas, so the project would result in an increase of impervious areas at the site of 2.46 acres. The project design includes several drainage facilities to accommodate identified runoff volumes and velocities within the site, including the placement of pervious pavement on approximately 19 percent of the site and the construction of four biofiltration basins. In the existing condition, the runoff rate for the 100-year peak flow rates is 118.26 cubic feet per second (cfs). The project, with the identified planned stormwater improvements, would result in

runoff rates for the 100-year peak flow rates of 115.23 cfs. As such, the project would not result in significant impacts associated with increased runoff rates due to new impervious surfaces.

Existing drainage at the site consists of sheet flows from the northeast portion to the southern property line and tends toward a natural drainage flowline at the bottom of the slope, adjacent to College Avenue. Off-site run-on enters the project site at three separate locations. The first location is an existing 36-inch reinforced concrete pipe (RCP) public storm drain main at the northern boundary of the project site (via an existing easement for storm drains to the City of San Diego), which is conveyed in a southerly direction through the project site and into California Department of Transportation (Caltrans) right-of-way (ROW) via an earthen drainage pathway prior to discharging to an existing 48-inch RCP (in the Caltrans ROW), which conveys flow under the I-8 off-ramp. An existing 18-inch RCP public storm drain (within an existing 10-foot-wide easement for storm drains to the City of San Diego) also discharges stormwater on to the project site at the eastern boundary, coming from Marne Avenue. Drainage flows westerly to its confluence with the earthen drainage channel discussed above and continues in a southerly direction towards the Caltrans headwall and 48-inch public RCP. An existing 30-inch RCP discharges stormwater onto the project site at the southwestern boundary of the project site from underground infrastructure and a grated inlet along College Avenue (in the Caltrans ROW). The discharge flows through an 18-inch public RCP pipe, outletting at a headwall on Caltrans ROW, adjacent to the project site, and flows into the project site where it enters an existing 15-foot-wide easement for storm drains to the City of San Diego. Runoff flows southeasterly and converges with the earthen drainage channel flow line, flowing from the project site into Caltrans ROW and ultimately discharging to the existing Caltrans 48-inch RCP, which continues under the I-8 off-ramp. All of the existing on-site stormwater that is generated by the project site flows toward the existing 48-inch storm drain near the southwest corner of the project site.

The project includes drainage improvements, including vacations of portions of existing easements for storm drains to the City of San Diego, and the creation of new easements for storm drains to the City of San Diego. Proposed storm drain easements would conform to the requirements of the City's Drainage Design Manual. The project includes the construction of underground pipe to route two of the existing outlets (discussed above) further down the site. Construction of the project includes a 36-inch RCP public off-site mainline storm drain that would connect to the existing 36-inch RCP at the northern boundary but would be rerouted underground down College Avenue (with no adverse effect to neighboring properties) and transition to a public 48-inch RCP after it turns on-site. Rerouting of the 36-inch RCP storm drain would require removal of 38.8 linear feet of existing storm drain, which would require vacation of the easement. The main 36-inch trunk line would be rerouted down northbound College Avenue and would turn on site just before the Caltrans ROW begins. This 36-inch RCP public storm drain would be centered on a 15-foot-wide proposed drainage easement to the City of San Diego as it goes underground. It would then transition to a public 48-inch RCP line (a portion of which would be in a new 15-foot storm drains easement to City of San Diego on site) after it turns on site and enters the first public cleanout on the project site. It would then parallel the Caltrans ROW on site, where it would transition from the proposed 15-foot-wide public storm drains easement to City of San Diego into the existing 15-foot-wide easement for storm drains to the City of San Diego.

At the southwest corner of the project site, an 18-inch public storm drain (with a proposed 15-foot public storm drain easement) is proposed within the private road on site to reroute the existing 18-inch RCP storm drain (located within a 10-foot easement for storm drains to the City of San

Diego). Rerouting of this storm drain would require removal of approximately 80 linear feet of 18-inch public RCP storm drain (with no adverse effects to neighboring properties) and vacation of a portion of the existing 10-foot easement for storm drains to the City of San Diego. The 18-inch RCP described above would be constructed to reroute the existing 18-inch storm drain to convey off-site stormwater runoff from the existing 18-inch public RCP storm drain downstream (from the neighborhood above the project site at Marne Avenue), through the proposed 15-foot easement for storm drains to the City of San Diego, before converging with the proposed mainline 48-inch RCP.

The new 48-inch public RCP would capture and convey off-site storm runoff that is discharged onto the project site in the existing condition and transport treated water from the project (via private drainage structures and pipe networks) from biofiltration basins 1–3, into a 10-foot-wide engineered earthen channel, dissipated by riprap. This engineered channel would be within the existing 15-foot easement for storm drains to the City of San Diego that would run along the existing drainage route at the southwest corner of the site, before entering the 19.87-foot-wide proposed easement for storm drains to the City of San Diego, where flows would be dissipated via rip-rap and would discharge along the existing flowline on site. This overland flowline then picks up the treated stormwater of biofiltration basin 4 (which is part of the project's private drainage infrastructure), before flowing over the project site property line into Caltrans ROW (mimicking the existing condition), following the natural overland drainage pathway before being picked up by the existing headwall and 48-inch storm drain in the Caltrans ROW that flows beneath I-8. All on-site and off-site runoff would have an ultimate discharge point at the off-site 48-inch RCP Caltrans storm drain that does under the I-8 offramp to College Avenue, just as it does in the existing condition.

Approximately 4.91 acres of the developed site runoff would drain to four biofiltration basins for water quality treatment and hydromodification management prior to discharging to the mainline storm drain. These biofiltration basins would detain and mitigate the 100-year storm event peak flow rate prior to discharging on site. Stormwater discharged from the biofiltration basins would move further downstream to the existing off-site Caltrans 48-inch storm drain system at the southern end of the project site. Stormwater discharged from the remaining 1.08 acres of slopes and self-mitigated areas on the project site would follow natural drainage paths or be conveyed via concrete brow ditches to the ultimate discharge point (the Caltrans 48-inch storm drain system) at the southern end of the site. Runoff was calculated for the 100-year storm events, using the Rational Method, where Q is the flow rate in cfs, C is the runoff coefficient (determined from Table A-1 of the City of San Diego Drainage Design Manual), I is rainfall intensity in inches per hour (in/hr), and A is the drainage basin area in acres. **Table 7-9, Summary of Overall 100-Year Storm Event Peak Flow Rates**, shows the 100-year storm event peak flow rates for the project site in the existing condition, the proposed condition (the project without the proposed biofiltration basins), and the proposed condition (the project with detention provided by the project's four biofiltration basins).

Table 7-9
SUMMARY OF OVERALL 100-YEAR STORM EVENT PEAK FLOW RATES

Condition	Total Drainage Area Off Site and On Site	Q100 (cubic feet per second)	Time of Concentration (minimum)
Existing Condition	64.4	118.26	13.07
Proposed Condition (the project without the proposed biofiltration basins)	64.4	116.80	13.05
Proposed Condition (the project with detention provided by the project's four biofiltration basins)	64.4	115.23	13.05

Source: Pasco Laret Suiter & Associates 2021

Table 7-9 shows the existing and proposed hydrologic results at the outfall of the project site. The proposed condition, both without and with the detention provided by the project's four biofiltration basins has a peak flow (Q100) that is less than the existing condition. Additionally, **Table 7-10, On-Site and Off-Site Hydrological Conditions**, shows the hydrological conditions at the project site in the existing condition, the proposed condition (the project without the proposed biofiltration basins), and the proposed condition (the project with detention provided by the project's four biofiltration basins).

Table 7-10
ON-SITE AND OFF-SITE HYDROLOGICAL CONDITIONS

Condition	Area (acres)	Q100 (cubic feet per second)	Time of Concentration (minimum)	V100 (feet per second)	Weighted C
Existing Condition	64.4	118.26	13.07	13.92	0.59
Proposed Condition (the project without the proposed biofiltration basins)	64.4	116.80	13.05	9.86	0.61
Proposed Condition (the project with detention provided by the project's four biofiltration basins)	64.4	115.23	13.05	9.77	0.61

Source: Pasco Laret Suiter & Associates 2021

As shown in Table 7-10, as a result of the detention provided by the four proposed biofiltration basins, the project would mitigate the 100-year storm event peak flow rate to below the existing condition. The proposed storm drain mainline would be sized to sufficiently convey the on-site and off-site 100-year storm event peak flow rate in the post development condition. There would be no negative impacts to adjacent properties. The project would not result in significant alteration of existing patterns, as the proposed improvements would ultimately discharge to the same location downstream of the project as the existing condition. As such, the project would not result in the substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes. Impacts would be less than significant.

The project site does not contain wetlands or jurisdictional areas and the project would not result in impacts to such resources. As such, the project would not result in the need for approvals related to Clean Water Act Sections 401 or 404.

The project site is not located within FEMA special flood hazard areas (FEMA 2021). No development is proposed as part of the project that would occur within the floodplain or result in flood-related impacts. No impact associated with 100-year floodplains would occur.

7.1.8 Mineral Resources

The City Significance Determination Thresholds (2020) indicate that a project could cause a potentially significant impact to mineral resources if it results in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. According to the Generalized Mineral Land Classification figure (Figure CE-6) in the Conservation Element of the City General Plan, the project site is designated as Mineral Resource Zone (MRZ-) 3 (City of San Diego 2008a). MRZ-3 areas contain mineral deposits, the significance of which cannot be evaluated from available data. As discussed in the Conservation Element, the City's high quality mineral resource areas are designated as MRZ-2. The project site is located adjacent to a developed residential neighborhood and is not suitable for mineral extraction, nor is it identified in the General Plan as an area of known mineral resource that would be of value to the region and the residents of the state. The project site has not been delineated on a local general, specific, or other land use plan as a locally important mineral resource recovery site, and no such resources would be affected with project implementation. As such, no impacts to mineral resources would occur.

7.1.9 Paleontological Resources

Based on the described City Significance Determination Thresholds (2020), impacts related to paleontological resources would be significant if a project would require excavation exceeding:

- Over 1,000 cubic yards (cy) of excavation extending to a depth of 10 feet or greater in a high-resource-potential geologic deposit/formation/rock unit; and/or
- Over 2,000 cy of excavation extending to a depth of 10 feet or greater in a moderate-resource-potential geologic deposit/formation/rock unit.

According to the geotechnical investigation prepared for the project (Advanced Geotechnical Solutions 2020a; Appendix F) the project site is underlain by the Santiago Peak Volcanic and Stadium Conglomerate formations. The Santiago Peak Volcanic is assigned a zero sensitivity for fossil resources, while the Stadium Conglomerate is assigned a high potential for fossil resources. As described in Section 3.2.4, *Grading Plan*, the project grading plan indicates that approximately 93 percent of the project site would be graded, with 16,500 cy of cut and 39,000 cy of fill (including 22,500 cy of import). The maximum depth of excavation would be 25.5 feet. Therefore, the project's grading permit would be conditioned to require paleontological monitoring during the initial cuts into Stadium Conglomerate formational materials due to exceeding the 10-foot-or-greater threshold of significance. Through compliance with the grading permit conditions, the project would result in less-than-significant impacts to fossil resources.

7.1.10 Population and Housing

The City has not adopted specific significance thresholds for addressing a project's population and housing impacts. However, CEQA Guidelines Appendix G indicates a project could have a significant impact on population and housing if it would:

- Induce substantial unplanned population growth in an area either directly or indirectly; and/or
- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

The project is an institutional land use that would not result in new residents or increase population in the project area. The project would not extend road or infrastructure to an area that does not have public utilities. As such, the project would not directly or indirectly induce substantial population growth in the area. Additionally, the project site does not currently contain existing residences that would be demolished or displaced as a result of the project and the project would not necessitate the construction of replacement housing to offset the removal of existing homes. Therefore, population and housing-related impacts associated with the project would be less than significant.

7.1.11 Public Services and Facilities

The City Significance Determination Thresholds (2020) state that public services and facilities impacts may be significant if the project would have an effect upon, or result in the need for, new or altered government services in any of the following areas: police protection, fire/life safety protection, libraries, parks, or other recreational facilities. If so, the focus of the analysis should be on the physical impacts of construction for public service facilities, such as whether the project would (1) conflict with the community plan in terms of the number, size, and location of public service facilities; and/or (2) result in direct impacts from construction of proposed new public service facilities needed to serve the project. The significance of a project's impacts should be evaluated relative to construction of public service facilities, particularly whether the project would conflict with the community plan in terms of number, size, and location of public service facilities, as well as if direct impacts from construction of new facilities needed to serve the project would occur.

As noted in Section 5.1, *Land Use*, while the project would require a CPA to add "Church" use to the Other Community Facilities map in the Navajo Community Plan, the project would not alter the zoning or land use designation of the site. As such, the number, size, and location of public service facilities required to serve the site would not change, as noted below.

7.1.11.1 Fire-Rescue

The project site is located within the City of San Diego Fire-Rescue Department (SDFD) service area for fire protection and medical services. The City has 52 fire stations protecting more than 343 square miles and over 1.4 million residents (City of San Diego 2021c). According to the Public Facilities, Services, and Safety Element of the City's General Plan, for medical patients and small fires, the first-due unit should arrive within 7.5 minutes, 90 percent of the time from the receipt of the 911 call in fire dispatch. For serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911-call receipt in fire dispatch, 90 percent of the

time (City of San Diego 2021a). The fire station closest to the project site is Fire Station 31, located approximately 1.1 miles north of the project site. Fire Station 31 serves Grantville/Del Cerro and its surrounding areas, with a district of 6.3 square miles (City of San Diego 2021c). Station 31 houses Engine 31 and Medic 31.

Similar to other institutional uses in the city, implementation of the project would require fire and emergency medical services. The project would result in staff being present on the site during weekdays, with additional attendees present at the site on weekday evenings for various small group activities. Additionally, on weekends, staff, volunteers, and church guests would be present. The project would result in some increases in service calls and response times; however, the project would not require the construction of new public facilities related to fire or emergency medical services. SDFD would provide first responder and first responder paramedic services to the project from Fire Station 31. Additionally, the project would be constructed in accordance with applicable fire codes and City regulations. The project would also be required to pay development impact fees prior to issuance of building permits, a portion of which could support maintenance of fire protection and emergency response services provided by the City. The project would not necessitate the construction of additional fire protection facilities that would result in impacts on the environment. Therefore, project impacts related to the provision of local fire protection services would be less than significant.

7.1.11.2 Police Services

The City of San Diego Police Department (SDPD) would serve the proposed project. The project site is located within the SDPD's Eastern Division, which serves a population of 155,982 people and encompasses 47.1 square miles. The Eastern Division serves the neighborhoods of Allied Gardens, Birdland, College East, College West, Del Cerro, Kearny Mesa, Lake Murray, Mission Valley East, Qualcomm, San Carlos, Serra Mesa, and Tierrasanta. The Eastern Division Substation is located at 9225 Aero Drive, approximately 4.3 miles northwest of the project site (City of San Diego 2021d). The SDPD does not staff individual stations based on the number of sworn officers per 1,000 population ratio, but it does have a goal of maintaining 1.48 officers per 1,000 population ratio citywide. As the project is an institutional use that would serve existing residents of the city and would not bring more residents to the area (through the construction of housing or large employment-generating uses) the project would not affect the existing sworn officers per 1,000 population ratio.

In consultation with SDPD, through the Crime Prevention through Environmental Design Review, the project has been designed to comply with emergency access requirements, which would help to reduce the demands for police services. The project would introduce an institutional use to the site. Although this could result in an increase in service calls compared to the current vacant property, the project is located in an urbanized area that is currently served by the SDPD. Additionally, the SDPD has facilities and staffing in the project area to adequately serve the project; ongoing funding for police services is provided by the City General Fund; and no new facilities or improvements to existing facilities would be required. Therefore, potential project-related impacts to police services and facilities would be less than significant.

7.1.11.3 Parks and Recreation Facilities

The project is an institutional use that would not increase the demand on park and recreational facilities in the project area. The project would not include construction of future housing or induce growth that could increase demand for park facilities or recreational amenities in the area. No need for new or physically altered park and recreation facilities would occur as a result of the proposed project and no impact would occur.

7.1.11.4 Schools

The project site is located within the San Diego Unified School District (SDUSD), which serves over 121,000 students ranging from preschool through grade 12 in 226 educational facilities (SDUSD 2021). The project is an institutional use that would not generate students or increase the need for school facilities. Additionally, the project would not include construction of future housing or induce growth that could increase demand for schools in the area. No need for new or physically altered school facilities would occur as a result of the proposed project and no impact associated with schools would occur.

7.1.11.5 Libraries

Library services are provided in the project area by the San Diego Public Library. The project is an institutional use and would not result in the construction of future housing or induce growth that could increase demand for library services in the area. As such, the project would not result in the need for new or physically altered library facilities and no impact to library services would occur.

7.1.12 Transportation

The City has adopted the following significance determination thresholds for addressing a project's transportation impacts (2020). According to the adopted significance determination thresholds, a project could have a significant impact on transportation if it would:

- Conflict with an adopted program, plan, ordinance or policy addressing the transportation system, including transit, roadways, bicycle, and pedestrian facilities;
- Result in VMT exceeding thresholds identified in the City of San Diego Transportation Study Manual;
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and/or
- Result in inadequate emergency access.

A Local Mobility Analysis (LMA) (**Appendix J** to this EIR) was conducted for the project (LOS Engineering 2022). The purpose of the LMA is to determine if there are any effects caused by project traffic that would trigger roadway and other multi-modal improvements or if the project should contribute a fair-share participation in planned improvements. The LMA evaluates and documents existing pedestrian, bicycle, and transit facilities and identifies any deficiencies in those facilities within a 0.5-mile distance of the site in the context of proposed improvements.

In addition to the proposed traffic signal and median improvements at the project's main entrance driveway along College Avenue, the project would construct pedestrian and bicycle improvements along the site's frontage on College Avenue. From the northern project boundary down to the proposed signalized main project entrance driveway, a 5-foot non-contiguous sidewalk with a transition to the existing contiguous sidewalk north of the project and a buffered Class II bike lane would be installed. From the proposed signalized main project driveway down to the southern project boundary, a 12-foot shared contiguous sidewalk consisting of a 6-foot bike path and a 6-foot pedestrian path would be installed.

Metropolitan Transit System lists Bus Routes 14 and 115 within a 0.5-mile walking distance from the project access. There are four bus stops within the 0.5-mile walking distance, with two on College Avenue just north of Del Cerro Boulevard, and two on College Avenue just south of Alvarado Road. Additionally, the San Diego State University trolley station is within a 1-mile walking distance of the project pedestrian access point. The Alvarado Road trolley station is over a 1-mile walking distance from the project site. Both stations are served by the Green Line trolley service operated by Metropolitan Transit Service (MTS).

The LMA analysis estimates that the project would generate 280 ADT, with 31 a.m. trips and 107 p.m. trips during the week and forecasts that the church would generate 1,976 ADT on Sunday when services are scheduled. The forecasted Sunday trip estimate is based, in part, on actual traffic counts taken at the three services offered at the church's existing location at 5555 University Avenue in San Diego, as adjusted for the proposed 900-seat capacity at the proposed location. The LMA addresses the effects of project traffic on intersections, street segments and freeway off-ramp queues in the project area. According to the analysis in the LMA, with the proposed traffic signal, median changes, sidewalk, and bike lane improvements in place, the project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system and no additional off-site improvements would be required; thus, a less-than-significant impact would occur.

A Vehicle Miles Traveled Analysis was prepared for the project (LOS Engineering 2021) and is contained in **Appendix K** to this EIR. As discussed above, the project would result in 280 weekday ADT, with 31 a.m. peak hour trips and 107 p.m. peak hour trips. On Sundays, the project would result in 1,976 ADT, with 690 Sunday peak hour trips (378 outbound after the 10 a.m. service and 312 inbound for the 11:30 a.m. service). The screening criteria to determine if a detailed transportation VMT analysis is required is based on the City of San Diego *Transportation Study Manual* (City of San Diego 2020b), which states that a project that meets at least one of eight screening criteria could be presumed to have a less-than-significant VMT impact. The project meets the small project criteria, which defines a small project as one that generates less than 300 daily unadjusted driveway trips using the City of San Diego trip generation rates and procedures. The project satisfies this criterion because the unadjusted weekday driveway trips for the project are calculated as 280 ADT. Therefore, the project does not require a detailed transportation VMT analysis because the project's unadjusted daily driveway trips would be below the "small project" threshold of 300 daily unadjusted driveway trips contained in the *Transportation Study Manual*. As such, the project would be presumed to have a less-than-significant impact regarding VMT.

The project would provide new vehicular access to the project site, with a full signalized access driveway along College Avenue. Additionally, a 24-foot right-in/right-out driveway would be located in the northern portion of the site. Each driveway would be designed consistent with City of San

Diego standards, and as such, the project would not result in significant impacts regarding hazards due to design features. No significant impact would occur.

The project includes provisions for emergency response and evacuation by providing two points of access along College Avenue. A traffic control plan would be implemented as a condition of approval during construction activities to ensure that adequate access is maintained, to the satisfaction of the City Engineer. During long-term operation of the project, the two driveways along College Boulevard would be maintained, ensuring access for emergency response. No impact associated with inadequate emergency access would occur.

7.1.13 Utilities and Service Systems

According to the City's Significance Determination Thresholds (2020), public utility impacts may be significant if the project would:

- Result in the need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts, with regards to the following utilities: electrical power, natural gas, water, sewer, communication systems, and solid waste disposal;
- Use excessive amounts of water; and/or
- Use predominantly non-drought-resistant landscaping and excessive water usage for irrigation and other purposes.

With regard to the specific utility services affected by the project, the following discussion of water supply/conservation, water facilities, wastewater facilities and treatment, solid waste management, and electricity and natural gas is provided.

7.1.13.1 Water Supply/Conservation

Under Senate Bill (SB) 610 (codified in the Water Code beginning at Section 10910), a water supply assessment (WSA) must be furnished to cities and counties for inclusion in any environmental documentation of projects (defined in the Water Code) that propose to construct 500 DU or more of residential, or that will use an amount of water equivalent to what would be used by 500 DU of residential uses (such as a commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space), and are subject to CEQA. Under SB 221, approval by a city or county of certain residential subdivisions requires an affirmative written verification of sufficient water supply or water supply verification (WSV). A WSA evaluates the water purveyor's ability to provide water supplies to a project during normal water supply year, a single dry water year, and multiple dry water years over a 20-year projection period, in addition to existing and planned future water demands within its jurisdiction. The project would result in the construction of a 54,476 SF church/sanctuary building, a parking garage, and landscaping, and would employ less than 50 people.

Based on the criteria contained in the Water Code, the project would not demand an amount of water equivalent to or greater than a 500 DU project, and as such, would not trigger the requirement for the preparation of a WSA (Water Code Section 10912). 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 designation of the site but would add the church use to the Other Community Facilities map of the Navajo Community Plan through an amendment. 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. A less-than-significant impact related to water supply entitlements would occur.

The project would minimize its demand for potable water by complying with the City's Land Development Code and CALGreen Code with regard to the installation of water conservation devices, such as low-flow toilets, showers, and faucets, and low-flow irrigation, as noted in the project's CAP Consistency Checklist (Appendix B) and would be included as part of project conditions of approval. In addition, the landscape plan contains drought-tolerant, native plants in its palette, which would further reduce the project's demand for potable water. Therefore, the project would not use excessive amounts of potable water and impacts associated with conservation would be less than significant.

7.1.13.2 Water Facilities

The project site is vacant but is located in an urban area which is served by the City of San Diego. The project would include construction of new on-site water infrastructure to extend water service to the project site. On-site improvements would include private water laterals connecting to the existing City facilities in the project area and off-site improvements would consist of public water infrastructure. A 320-linear-foot, 8-inch public water main extension would be installed along College Avenue to a point of connection at its intersection with Del Cerro Boulevard, within the College Avenue and Del Cerro Boulevard ROW. On-site improvements would include the installation of a 2-inch-diameter public domestic water service connection, an 8-inch-diameter private water line for fire service, and a 1-inch-diameter irrigation line. Water infrastructure would be designed and constructed in accordance with the criteria established by the City of San Diego's current water facility guidelines, regulations, standards, and practices. The project site is planned for future development and proposed in a developed, urban area already served by utility infrastructure. The impacts of constructing the new public water main line have been addressed in this EIR and no other off-site facilities would be required to provide water services to the project. The project would not require the construction of new water systems or require substantial alterations to existing water facilities such that the construction would create physical impacts. Impacts associated with water facilities would be less than significant.

7.1.13.3 Wastewater Facilities and Treatment

As discussed for water facilities above, the project would include the construction of new on-site wastewater infrastructure to extend wastewater services to the site. Although the project site is vacant, the project area is urbanized, and existing wastewater infrastructure is present in the area. Wastewater treatment is provided at the project site by the City of San Diego's Metropolitan Wastewater System. Wastewater produced on site would be pumped up to a private sewer discharge manhole, where it would gravity flow via a private 8-inch-diameter gravity flow sewer lateral to a private sewer lift station and private sewer force main which would connect through an adjacent private residential lot via a private sewer lateral to an off-site public sewer main in Marne Avenue. Project-related wastewater infrastructure would be designed and sized to meet the

project's needs in accordance with the criteria established by the City of San Diego's current sewer facility design guidelines, regulations, standards and practices. As such, wastewater facilities and treatment impacts would be less than significant.

7.1.13.4 Solid Waste Management

A WMP was prepared for the project (**Appendix L**; Baranek Consulting Group 2020b). The WMP evaluates the project's anticipated construction and operational waste and assesses whether or not it would result in an impact on local solid waste management programs, policies and waste diversion goals. The City CEQA Significance Determination Thresholds for solid waste identify a threshold of 1,500 tons of waste or more during construction and demolition (C&D) for direct solid waste impacts, and 60 tons of waste or more during C&D for potentially significant cumulative solid waste impacts.

Construction activities would generate waste in the form asphalt and concrete, brick/masonry/tile, cardboard, carpet/ padding/foam, drywall, landscape debris, mixed 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 City of San Diego's C&D Debris Deposit Ordinance. Construction activities are estimated to generate approximately 241 tons of waste.

During operation of the project, the church/sanctuary would generate approximately 56.4 tons of waste annually, not taking into account compliance with City regulations on diversion. The project would be required to provide exterior refuse and recyclable material storage areas in accordance with City regulations (San Diego Municipal Code Chapter 14, Article 2, Division 8, *Refuse and Recyclable Material Storage Regulations*), which would enable on-site recycling. Landscape maintenance would include the collection and diversion of green waste. Diversion activities during project occupancy would achieve a 40 percent diversion rate, resulting in 22.6 tons of waste diverted annually.

Based on the WMP estimates, the project would meet the 75 percent solid waste diversion rate for waste produced during the construction phases. 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., 47.5 tons of construction materials to Miramar Landfill). Project operations would dispose of 33.8 tons of solid waste to Miramar Landfill which would not exceed the 60 or more tons of waste for cumulative impacts.

The project would implement the provisions of its WMP as part of the construction and operational phases to offset its cumulative contribution to solid waste quantities in the region. Therefore, the project would not adversely impact the permitted capacity at Miramar Landfill. Less than significant impacts would occur.

7.1.13.5 Electricity and Natural Gas

Electricity and natural gas to the project site would be provided by SDG&E. The construction of the project would include the placement of new underground electrical and natural gas infrastructure at the project site, which would connect with existing SDG&E infrastructure in the project vicinity. The project is located in an urbanized area where existing electrical and natural gas infrastructure is already extended. The project would not result in the need for new energy delivery systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts. Impacts associated with the provision of electricity and natural gas to the site would be less than significant.

7.1.14 Water Quality

According to the City's Significance Determination Thresholds, water quality impacts may be significant if the project would:

- Result in an increase in pollutant discharge to receiving waters during or following construction, or discharge identified pollutants to an already impaired water body; and/or
- Result in short-term and long-term effects on local and regional water quality.

Information for the following discussion is based on the *Preliminary Drainage Study* (Pasco Laret Suiter & Associates 2021) and *Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP)* (Pasco Laret Suiter & Associates 2020) for the project, which are included as **Appendix H**, *Preliminary Drainage Study*, and **Appendix I**, *Stormwater Quality Management Plan*, of this EIR.

Compliance with the water quality standards is ensured through permit conditions provided by Land Development Review Engineering for private projects (City of San Diego 2016). Adherence to the City's stormwater regulations is, thus, considered adequate to preclude surface water quality impacts. Accordingly, conformance with the City's stormwater regulations is the applicable threshold. If it is determined that BMPs are to be used to protect a specific environmental resource (e.g., biological resources) and these BMPs are above and beyond what is required to achieve compliance with the City's Water Quality Standards, the impacts would be considered significant and the BMPs should be regarded as mitigation measures.

The project site is situated within the Mission San Diego Hydrologic Unit (No. 907.11). Site runoff discharges on the southwest corner of the site, into an existing 48-inch concrete headwall that carries stormwater under I-8 and into Alvarado Creek. From Alvarado Creek, stormwater slows and merges into San Diego River (Lower), and then flows into Famosa Slough and Channel. Stormwater ultimately flows into the Pacific Ocean Shoreline, San Diego Hydrologic Unit, at Stub Jetty, south of San Diego River outlet, near Cape May Avenue. Alvarado Creek is located approximately 500 feet downstream of the project site and is included in the most recent list of Clean Water Act Section 303(d) List of Water Quality Segments; Alvarado Creek is impaired for nitrogen. The existing beneficial uses of receiving waters downstream of the project discharge locations include agricultural supply; aquaculture; preservation of biological habitats; cold freshwater habitat; commercial and sport fishing; industrial service supply; marine habitat; migration of aquatic organisms; municipal and domestic supply; navigation; rare, threatened, or endangered species; non-contact water recreation; water contact recreation; shellfish harvesting; spawning,

reproduction, and development; warm freshwater habitat; and wildlife habitat. Pollutants anticipated to occur at the project site include sediment, nutrients, trash and debris, and pesticides.

The infiltration feasibility condition for the project has been identified as a “no infiltration” condition for the proposed BMP biofiltration basins. This condition has been identified based on the existing and proposed grades of the site; the proposed development; depths of existing artificial fill; proposed BMP’s distance to slopes, underground utilities, structures, and retaining walls; and the negligible permeability of the underlying bedrock units (Advanced Geotechnical Solutions 2020b, included in Attachment 1 of the project SWQMP, Appendix I of this EIR).

The project site is divided into five Drainage Management Areas (DMAs). DMA-1 through DMA-4 would be treated for water quality and hydromodification. DMA-5 is self-mitigating and would not require water quality treatment or hydromodification. The project would use permeable pavement as Site Design BMPs, and biofiltration for permanent structural BMPs for DMA-1 through DMA-4. The project proposes four biofiltration basins that would provide stormwater quality treatment and hydromodification management for on-site runoff. On-site stormwater runoff would drain to the four biofiltration basins for water quality treatment and hydromodification management prior to discharging to the mainline storm drain. The DMAs, including total area, total impervious areas, total pervious areas, runoff factors, design capture volume, DMA type, and associated BMPs are summarized in **Table 7-11, Drainage Management Areas Summary**.

As discussed in Section 7.1.7, *Hydrology*, on-site stormwater runoff would be directed to the four biofiltration basins and then discharged into existing storm drains. The 36-inch RCP mainline storm drain is proposed to connect to the existing 36-inch RCP at the northern boundary, which would be rerouted underground down College Avenue, requiring vacation of the existing easement for storm drains to City of San Diego. This main 36-inch trunk line would be re-routed down northbound College Avenue and would turn on site just before the Caltrans ROW begins. This 36-inch RCP would be centered on a 15-foot proposed easement for storm drains to the City of San Diego, as it goes underground below the slope on site. It would then transition to a public 48-inch RCP line (a portion of which would be in a new 15-foot easement for storm drains on site to City of San Diego) after it turns on site and enters the first public cleanout on the project site. It would then parallel the Caltrans ROW on site, where it would transition from the proposed 15-foot easement for storm drains into the existing 15-foot-wide easement for storm drains to the City of San Diego. At the southwest corner of the project site, an 18-inch public storm drain (within a proposed 15-foot public easement for storm drains to the City of San Diego) is proposed within the private road on site to reroute the existing 18-inch RCP storm drain (within an existing 10-foot easement for storm drains to the City of San Diego). This improvement would require removal of approximately 80 linear feet of the 18-inch public RCP storm drain. This would convey off site stormwater from the existing 18-inch public RCP storm drain downstream (from the neighborhood above Marne Avenue), through the proposed 15-foot public easement for storm drains to the City of San Diego, and on to the proposed 48-inch public storm trunk line, where it would be picked up by the existing headwall and public 48-inch storm drain that flows beneath I-8.

Table 7-11
DRAINAGE MANAGEMENT AREAS SUMMARY

Drainage Management Areas (DMAs)	Total Area (square feet)	Total Area (acres)	Total Impervious Area (acres)	Total Pervious Area (acres)	DMA Runoff Factor C ^a	Design Capture Volume (cubic feet)	DMA Type	Structural BMP Type	Structure BMP Name
DMA-1	23,775	0.55	0	0.26	0.16	203	Drains to BMP	Biofiltration	BMP-1
DMA-2	27,352	0.63	0.04	0.09	0.17	242	Drains to BMP	Biofiltration	BMP-2
DMA-3	56,780	1.30	0.93	0.20	0.69	2,061	Drains to BMP	Biofiltration	BMP-3
DMA-4	106,108	2.44	1.49	0.78	0.63	3,515	Drains to BMP	Biofiltration	BMP-4
DMA-5	46,929	1.08	0	1.08	0.23	0	Self-Mitigating	Self-Mitigating	Not Applicable

Source: Pasco Laret Suiter & Associates 2021

Notes:

- ^a Area weighted runoff factor "c" calculated per Appendix B.1.1 of the City of San Diego BMP Design Manual (October 2018). All impervious surfaces were assigned a runoff factor of 0.90. All permeable pavement was assigned a runoff factor of 0.1. All landscape areas were assigned a runoff factor of 0.23, consistent with Type C soils.
- ^b 85th percentile rainfall, I = 0.63 inches.
- ^c Design capture volume (DCV) calculated per Appendix B.1 of the City of San Diego BMP Design Manual (October 2018). $DVC = (C \cdot I \cdot A) / 12$.

All new parking, garage, and road surface stormwater would be collected via storm drain inlet structures and piped to different biofiltration basins throughout the site for water quality treatment and hydromodification controls. The church/sanctuary building would have roof drains directed to biofiltration basin 4. Concrete brow ditches would be used to convey off-site drainage, drainage along the property line, and self-mitigating landscape areas. These ditches would end at catch basins and routed amongst the main storm drain line and routed south. With the exception of DMA-4, the entire off-site and on-site drainage ends up in the 48-inch public storm drain within the Caltrans ROW before it exits at a headwall into an engineered earthen tunnel. This flows adjacent to the proposed retaining wall and church/sanctuary building before outletting at riprap and converging with the treated runoff from DMA-4. For there, storm drainage follows the existing drainage path to the existing 48-inch Caltrans storm drain (with headwall).

The project would incorporate source control BMPs, including the following: prevention of illicit discharges into the MS4; storm drain stenciling or signage; and protection of outdoor storage material areas and trash storage areas from rainfall, run-on, runoff, and wind dispersal. Additional BMPs would be implemented based on the following potential source runoff pollutants for the project: on-site storm drain inlets; interior floor drains and elevator shaft sump pumps; interior parking garages, landscape/outdoor pesticide use; refuse areas; industrial processes; outdoor storage of equipment or materials; vehicle and equipment cleaning; vehicle and equipment repair and maintenance; fire sprinkler test water; miscellaneous drain or wash water; and plaza, sidewalks, and parking lots.

Site design BMPs that would be implemented as part of the project include the conservation of natural areas, soils, and vegetation; minimization of impervious areas and soil compaction; impervious area dispersion; runoff collection; and landscaping with native or drought-tolerant species. Conservation of natural areas, soils, and vegetation would occur by planting additional native or drought-tolerant trees and shrubs and replacement of topsoil in areas of disturbance. Impervious areas would be minimized by using permeable pavers in the private driveways and surface parking areas, and within drive aisles to the minimum width necessary. All proposed landscape and biofiltration areas minimize soil compaction to allow more stormwater runoff to permeate into the soil and slow down flows. The project disperses all impervious areas through landscaping, biofiltration/stormwater treatment, or permeable pavers prior to draining to the public storm system. The project treats site runoff in permanent post-construction BMPs prior to releasing flow off site. All proposed landscape areas would be planted with native or drought-tolerant species.

In summary, the project would incorporate BMPs, including the use of permeable pavement and four biofiltration basins to treat stormwater before release into the stormwater system. The biofiltration basins have been sized and designed to meet water quality and hydromodification requirements. The improvements would ensure that all on-site stormwater runoff, including roof and garage drainage, would be diverted to a private storm drain system and treated by the biofiltration basins and detained in accordance with the City's hydromodification requirements before being discharged. The treated and detained storm runoff would be conveyed as described in Section 7.1.7, *Hydrology*. The on-site treatment BMPs outlined in the Stormwater Quality Management Plan would comply with the City's Stormwater Quality Standards. Therefore, less-than-significant water quality impacts are identified.

7.1.15 Wildfire

The City has not yet prepared Significance Determination Thresholds for potential impacts associated with wildfire. Therefore, for purposes of this analysis, guidance provided by issue questions listed in CEQA Guidelines Appendix G are used to evaluate the potential for significant wildfire impacts. Specifically, a significant impact is identified if a project would:

- Substantially impair an adopted emergency response plan or emergency evacuation plan;
- Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire;
- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; and/or
- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

As discussed in Section 7.1.11, *Public Services and Facilities*, the project site is located within the SDFD service area for fire protection services. The fire station closest to the project site is Fire Station 31, located approximately 1.1 miles north of the project site. Fire Station 31 serves Grantville/Del Cerro and its surrounding areas, with a district of 6.3 square miles (City of San Diego 2021c).

7.1.15.1 Emergency Response or Evacuation Plan

As discussed in Section 7.1.6, *Health and Safety*, the City participates in the County's Unified San Diego County Emergency Services Organization and County of San Diego Operational Area Emergency Plan (County of San Diego 2018). Primary evacuation routes identified in the emergency plan that are nearest to the project site include I-8, which is located just south of the project site, and I-15, which is located approximately 3 miles west of the project site. As discussed previously, specific evacuation routes would be determined based on the location and extent of the emergency incident and generally would include as many predesignated transportation routes as possible (County of San Diego 2018). While the project would result in off-site improvements on College Avenue to provide access to and from the site, these improvements would not impair the implementation of, or physically interfere with, an adopted emergency response plan or evacuation plan. An encroachment permit from the City would be required for the identified improvements to College Avenue, and traffic control would be implemented to ensure safe passage through the area while construction is occurring. The permit and traffic control requirements would ensure that emergency access is maintained in the project area during construction activities. Once complete, the project would not interfere with any emergency response due to construction activities along College Avenue.

During operation of the project, people would be present at the project site primarily on Sundays; although small group activities may occur during the weekdays or on Saturdays. The project would not result in a permanent increase in people living in the area. The Project would include the provision of a full access private driveway, which would be constructed along College Avenue, with a new signalized intersection and turn lanes and a second private driveway access would be added in

the northern portion of the site, providing an additional access point to the site from College Avenue. The project's ingress/egress plans would be required to comply with the City's street design requirements, including standards related to minimum sight distance and emergency access. Signalization of the project entrance would control traffic coming in and out of the site. Additionally, the project would be constructed to comply with the City's Fire Code and City requirements related to development within a VHFHSZ, including standards for maintaining emergency evacuation and access. Impacts associated with emergency response and evacuation plans would be less-than-significant impact.

7.1.15.2 Exacerbate Wildfire Risks

According to the City's VHFHSZ Map No. 20, the project site is located within a "VHFHSZ & 300' Brush Buffer" (City of San Diego 2009). The project site is surrounded on all sides by urban development, with the exception of an isolated fee-owned parkland parcel that is situated between I-8 and the project site that does not interface with wildlands. Some undeveloped hillsides occur east of the project site and west of College Avenue but are bordered by I-8 to the south, and residential development to the west and north. Due to the project's location in a VHFHSZ, and the presence of undeveloped land adjacent to the site, the project would have the potential to result in impacts associated with VHFHSZs. The proposed church/sanctuary building would consist of concrete-tilt up facades, with accents of wood fascia and terra-cotta-colored tile roofing materials. The parking structure would be constructed with concrete walls. The primary construction materials for the structures consist of concrete, and roofing for the church/sanctuary building would consist of tile roofing materials, resulting in minimal flammability for the proposed structures. Landscaping would be installed as part of the project, including the areas along the southern portion of site, south and west of the proposed church/sanctuary. No fuel modification zones are required as part of the project. As part of standard development procedures, the proposed development plans, including the landscaping plan, would be submitted to the City for review and approval to ensure that the project would be constructed to comply with the City's Fire Code and City requirements related to development within the VHFHSZ. As such, the project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

7.1.15.3 Installation or Maintenance of Infrastructure

The project does not include components that would require the installation or maintenance of associated infrastructure that may exacerbate fire risk. The project is located in an urbanized area, with direct access to area roadway network and emergency services within the city. Utilities are present in the project vicinity and direct connection to existing utilities would occur as part of project construction. No new roads, fuel breaks, emergency water sources, or other utilities that may exacerbate fire risk are proposed as part of the project. No impact would occur.

7.1.15.4 Downstream Flooding or Landslides

As discussed in Section 7.1.4, *Geologic Conditions*, no landslides or indications of deep-seated land sliding were observed at the site during field observations or during review of published geologic maps. The nearest known landslide is approximately 0.75 miles west of the project within exposures of Friars Formation, which are not present at the project site. The project site currently contains slopes up to approximately 25 feet in height along the western/northwestern property boundary,

adjacent to College Avenue (Advanced Geotechnical Solutions 2020a; Appendix F). Existing slopes descend to a minor drainage basin at the southwestern corner of the site. Construction of the project would include grading of approximately 93 percent of the project site, with the two-level parking structure recessed into the terrain. The project includes the construction of stormwater systems and detention basins to control runoff rates and prevent flooding on or off site. The project would incorporate geotechnical recommendations and would comply with applicable building standards and the City's BMPs for drainage. Compliance with geotechnical recommendations, building and construction standards, and the City's BMP requirements, as well as the construction of on-site stormwater systems and detention basins would ensure that the project would not result in significant impacts associated with downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

7.2 Growth Inducement

This analysis presents responses to each Initial Study checklist question and demonstrates why the project's effects on growth inducement are not found to be significant. Based on the City's Initial Study Checklist, a project could result in significant growth inducement impacts if it would:

- Induce substantial population growth in an area, (for example, by proposing new homes and commercial or industrial businesses beyond the land use density/intensity envisioned in the community plan);
- Substantially alter the planned location, distribution, density, or growth rate of the population of an area; or
- Include extensions of roads or other infrastructure not assumed in the community plan or adopted Capital Improvements Project list, when such infrastructure exceeds the needs of the project and could accommodate future developments.

A project is regarded as growth-inducing if it can foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (CEQA Guidelines Section 15126.2(d)). Included in this definition are projects that would remove obstacles to population growth, such as extending public services into areas not previously served. Growth inducement can also be defined as an action that would encourage an increase in density of development in surrounding areas or encourage adjacent development. Growth should not be assumed to be beneficial, detrimental, or of little significance to the environment (CEQA Guidelines Section 15126.2(d)).

The project is an institutional use that would serve the existing population in the project vicinity. The project does not include new residences or a large job-generating use that would cause workers to relocate to the area. Although the project site is currently vacant, it is located in an urbanized area with existing residential, commercial, institutional, and recreational uses with adequate utility services. As such, the project would not result in substantial growth inducement. The infill nature of the project would not foster population growth, either directly or indirectly, as it would accommodate the population currently existing rather than opening up a new area of land for population growth. The project would not alter the planned location, distribution, density, or growth rate of the Navajo Community Plan area, adjacent communities, or the city as a whole.

Although the project includes improvements to existing on-site utilities such as water, sewer, and electricity, these improvements would be sized to only serve the needs of the project and would not extend into previously unserved areas. No new infrastructure would be provided that would exceed the needs of the project and/or that could accommodate future growth not already planned for the project area. Development of the proposed institutional use and associated parking and landscaping would not foster economic or population growth, either directly or indirectly, such that construction of additional housing in the surrounding area would be required. For these reasons, the project would not encourage or facilitate growth-inducing activities that could significantly affect the surrounding environment, individually or cumulatively.

7.3 Significant Environmental Effects that Cannot Be Avoided if the Project Is Implemented

CEQA Guidelines Section 15126.2(b) requires an EIR to identify significant environmental effects that cannot be avoided if the project is implemented (14 CCR 15000 et seq.). As discussed in Chapter 5, *Environmental Analysis*, implementation of the project would not result in any significant and unmitigated impacts.

7.4 Significant Irreversible Environmental Changes Caused by the Project

CEQA Guidelines Section 15126.2(d) requires the evaluation of significant irreversible environmental changes that would occur as a result of a project. The evaluation includes a discussion of primary and secondary impacts, and environmental accidents potentially associated with the project. Primary impacts can include impacts associated with the use of nonrenewable resources (i.e., biological habitat, agricultural land, mineral deposits, water bodies, energy resources, and cultural resources). Secondary impacts can include impacts such as highway improvements which provides access to a previously inaccessible area.

Section 15126.2(d) also states that irretrievable commitments of resources should be evaluated to ensure that current consumption of such resources is justified. Implementation of the project would not result in significant irreversible impacts to agricultural land, mineral resources, water bodies, historical resources, paleontological resources, or tribal cultural resources.

The project would require the commitment of energy and non-renewable resources such as electricity, fossil fuels, natural gas, construction materials (such as concrete, asphalt, sand and gravel, steel, petrochemicals, and lumber), potable water, and labor during construction. The project would be required to comply with current Title 24 Building Standards and CALGreen Code, as discussed previously. Additionally, the project incorporates several sustainable building practices to minimize its consumption of energy and non-renewable resources, which would be included as part of project conditions of approval, including the following: cool/green roofs; the use of low-flow fixtures/appliances and low-flow irrigation; electrical vehicle charging stations; designated and secure bicycle parking spaces; designated parking spaces for low-emitting, fuel-efficient, and carpool/vanpool vehicles; and implementation of a solid waste recycling plan. Nonetheless, the use

of these resources would have an incremental effect regionally and would result in long-term irretrievable losses of non-renewable resources, such as fuel and energy.

The project would result in the loss of a total of 4.0 acres of sensitive vegetation, consisting of 3.9 acres of Tier II vegetation and 0.8 acres of Tier IIIB vegetation. Additionally, construction of the project could result in direct injury or mortality to the orange-throated whiptail and would result in direct loss of its habitat. Indirect impacts to special-status plant and animal species would be less than significant due to the infill nature of the project and its location in an urbanized area. Irreversible impacts to an individual orange-throated whiptail and its habitat and to sensitive vegetation would occur as a result of project implementation, as discussed in Section 5.2, *Biological Resources*. The species is, however, adequately conserved in the Multi-Habitat Planning Area (MHPA). Project impacts to biological resources would be mitigated to less than significant by incorporation of Mitigation Measures Bio-1, which would protect biological resources during construction, and Bio-2, which would provide payment to the City's habitat acquisition fund.

The project has the potential to disturb unknown subsurface sensitive historical resources and tribal cultural resources (TCRs) during project construction, and such impacts would be irreversible. However, impacts for subsurface historical resources and potential TCRs would be reduced below a level of significance with incorporation of mitigation, as described in Sections 5.3, *Historical Resources*, and 5.6, *Tribal Cultural Resources*. Recovery of any unearthed materials would occur during construction monitoring.

The project does not include the provision of roadway or highway improvements that would provide access to previously inaccessible areas. The project's driveways and off-site improvements to College Avenue have been designed in accordance with City engineering standards. The project would not result in secondary impacts that would cause significant irreversible environmental changes.

8. PROJECT ALTERNATIVES

8.1 Introduction

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15126.6(a), an Environmental Impact Report (EIR) must contain a discussion of “a range of reasonable alternatives to the project, or to the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” Section 15126.6(f) further states that “the range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.”

The following discussion focuses on project alternatives that are capable of eliminating significant environmental impacts or substantially reducing them as compared to the project, even if the alternative would impede the attainment of some project objectives or would be more costly. In accordance with CEQA Guidelines Section 15126.6(f)(1), among the factors that may be taken into account when addressing the feasibility of alternatives are: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site. Not one of these factors establishes a fixed limit on the scope of reasonable alternatives. An alternative does not need to be considered if its environmental effects cannot be reasonably ascertained and if implementation of such an alternative is remote or speculative.

The evaluation of individual alternatives considered in detail is provided in Sections 8.4.1 through 8.4.3, with a summary of the project alternatives and identification of the environmentally superior alternative outlined in Section 8.5. A matrix comparing the environmental impacts of the alternatives analyzed in detail to those of the project as proposed is provided thereafter.

8.2 Summary of Project Objectives and Significant Effects

As required in CEQA Guidelines Section 15126.6(a), in developing the alternatives to be addressed in this section, consideration was given regarding an alternative’s ability to meet most of the basic objectives of the project. These objectives are presented in Chapter 3, *Project Description*, of this EIR and are provided below in Section 8.2.1 for ease of reference.

8.2.1 Project Objectives

The objectives associated with the project are as follows:

1. Place the church/sanctuary in a central San Diego location that is both visible from and convenient to a regional freeway to facilitate church attendance;
2. Relocate to a church-owned property that has proximity to its existing congregation, including its members in City Heights, Mid-Cities, College Area, and Del Cerro;

3. Establish a place of worship that would accommodate the existing and future space needs of its staff and congregation;
4. Design the structures and site improvements to be sensitive to the existing topography and surrounding neighborhoods;
5. Address the parking needs on Sundays by constructing sufficient parking to accommodate the maximum projected parking demand;
6. Develop the church/sanctuary near where transit connections are readily available to its congregation;
7. Enhance the religious, spiritual, and community-building activities, including Sunday School and adult education, through the design and character of the indoor and outdoor spaces; and
8. Fulfill the institution's religious mission to be a multi-ethnic, multi-generational local church with a global vision.

8.2.2 Significant Impacts of the Proposed Project

Based on the analysis contained in Chapter 5, *Environmental Analysis*, the project would result in the potential for significant impacts to biological resources (sensitive habitat), historical resources (unknown archaeological and religious or sacred resources, human remains), noise (construction noise) and tribal cultural resources (TCRs). Measures have been identified in Chapter 5 that would reduce these project impacts to below significance with mitigation incorporated. Project impacts to land use and visual effects/neighborhood character would be less than significant, as described in Chapter 5.

In accordance with CEQA Guidelines Section 15126.6(c), the following analysis of project alternatives is preceded by a brief description of the rationale for selecting the alternatives to be discussed. In addition, alternatives that were considered but rejected are also identified. It should be noted that CEQA does not compel a lead agency to adopt an alternative that is less environmentally damaging than the project, but only to identify feasible alternatives that could avoid or substantially lessen the project's significant environmental effects. CEQA states that "in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof" (Public Resources Code Section 21002).

8.3 Alternatives Considered but Rejected

In accordance with CEQA Guidelines Section 15126.6(f)(2)(A), alternative locations for the project would be considered if "any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR." An alternative use for the site is discussed below in response to comments received on the Notice of Preparation (NOP) (see Appendix A for details).

8.3.1 Alternative Project Location

Off-site alternatives should be considered if development of another site is feasible and if development of another site would substantially lessen or avoid the significant impacts of the project. Factors that need to be considered when identifying an off-site alternative include the size of the site, its location, the General Plan (or other applicable planning document) land use designation, availability of infrastructure, and whether or not the applicant can reasonably acquire, control, or otherwise have access to the alternative site. It should be noted that the availability of an alternative site does not in and of itself reduce the project's impact potential. It is expected that developing a similar project on a different site would result in a similar array of project impacts and would simply transfer the impact potential to areas surrounding the alternate site location.

Currently, All Peoples Church occupies several rented buildings at 5555 University Avenue in the College area community, approximately 2.5 miles south of the project site. Their current facilities are being planned for redevelopment as part of the Chollas Triangle Park project. The offices are open Monday through Thursday from 9 a.m. to 6 p.m. and are closed on Fridays. Services are provided on Sundays during three timeframes. The church generally draws its congregation from the surrounding communities and is located in central San Diego for ease of access to its existing population. The choice of properties with significantly differing environmental profiles is limited in this region due to:

1. The applicant's need to locate in fairly close proximity to the population base it currently serves;
2. High levels of development already present in the area; and
3. The limitations of available sites in terms of size and functionality.

This project area and nearby communities are already highly developed, as shown in Figure 2-2. As a result, available sites of sufficient size are not common. Site ownership and site design are important aspects of the site selection for the applicant, so that the facility can fully express design features that support the religious beliefs of the congregants. Therefore, renting is not an option because it would not meet the basic needs of the applicant. The applicant conducted an extensive survey of area properties before initiating this proposal, and the proposed location was found to best fit their needs. The applicant does not currently own any similarly sized undeveloped or developed parcels within the project area, and the applicant cannot reasonably acquire, control, or otherwise have access to a sufficiently sized alternative site within the communities it serves.

The present site described in this EIR remains the best location that combines all of the factors that the applicant requires for an adequate worship facility. Any project in the area would rely on existing infrastructure, including primary access routes, rendering a different location likely to have similar traffic impacts. Proximity to existing development would trigger similar concerns expressed by the local community. Additionally, a developed site could be closer to sensitive receptors or be on level terrain with residential development, possibly increasing the intensity of project effects. The areas in the vicinity that are undeveloped are more distant from developed areas and are frequently located in environmentally sensitive locations, such as steep hillsides or on properties with highly sensitive biological resources.

No alternative location is proposed in the EIR because this site presents special features that make it the best choice for a project of this kind. The approximately 6-acre site contains adequate room to accommodate a church/sanctuary building, parking, and access. The building site is lower in elevation than surrounding residential uses, making it less dominant when compared to level properties. All of the required infrastructure is already available to serve the site. Finally, relocating the project to an alternative location away from major roads would not allow the applicant to take advantage of freeway access and visibility and transit within the community it serves, which is one of the project objectives. As such, the current site presents characteristics that make it particularly well-suited for the project and an alternative project location is not studied in detail in this EIR.

8.3.2 Alternative Land Use

In response to comments received on the NOP, community members have suggested alternative land uses for the project site, including retaining the site as open space or developing the property into a park. As noted in Chapter 3, *Project Description*, of the EIR, the project site is designated for residential use in the General Plan and Navajo Community Plan (Community Plan) and is zoned RS-1-7; therefore, retaining the site as open space or creating a park use would be inconsistent with the intent of the General Plan, Community Plan, and underlying zoning. Retention of the site in open space would prevent a property in an infill location that has access to utilities, public services, and transit from being developed. Development of a neighborhood park in this location would have similar construction-period impacts to biological resources, historical resources, and noise as the project. In addition, a park would not be compatible with the freeway noise exposure currently experienced on site, based on the land use-noise compatibility standards in the Noise Element of the General Plan (see Table 5.4-3). Finally, alternative land uses would not achieve any of the applicant's project objectives. Therefore, alternative land use scenarios are not studied in detail in this EIR.

8.3.3 No Project/Existing Community Plan

Under the existing Community Plan, the property would be developed with a residential use that is consistent with the land use designation and zoning for the site. A Community Plan Amendment would not be required to for development according to the existing Community Plan. Based on the development regulations in the Land Development Code (LDC) for the RS-1-7 (Section 131.0430 for Development Regulations of Residential Zones), the following basic requirements would be applied to the approximately 6-acre project site to define development that would occur with the existing Community Plan:

- Minimum lot size of 5,000 square feet
- Minimum lot width of 50 feet
- Minimum lot depth of 95 feet
- Minimum front setback of 15 feet
- Minimum rear setback of 13 feet
- Maximum height structure of 30 feet

Based on the RS-1-7 development regulations, up to 52 single-family homes could be constructed on site. If accessory dwelling units (ADU) are built concurrently on site, in accordance with LDC Section 141.0302, the existing Community Plan could allow for the development of up to 52 ADUs on the project site. A total of up to 104 units could be constructed on-site under the existing Community Plan. Similar to the project, it is likely that a deviation related to side yard setbacks would be required to implement this alternative due to the project site's relationship to College Avenue. The entire project site would be graded and retaining walls would be used to create buildable area. Development consistent with the existing Community Plan would construct residences that would comply with the height and bulk regulations in the RS-1-7 zone, whereas the project is requesting deviations from the height regulations to accommodate the roofline and cross on the church/sanctuary building. Therefore, development consistent with the existing Community Plan would directly align with the height and bulk regulations in the LDC, as compared to the project.

Development of the project site consistent with the existing Community Plan would result in up to 104 units, which would generate 1,040 new vehicle trips (based on the City trip generation rate of 10 trips/unit). That amount of traffic would not qualify as a small project, as defined by the City's Transportation Study Manual guidelines, and thus is assumed to result in a significant impact related to Vehicle Miles Traveled (VMT). The presumed new significant VMT impact is a new significant impact, resulting in greater significant impacts as compared to the project, which would not result in a significant transportation impact as discussed in Section 7.1.12, *Transportation*. Finally, the Existing Community Plan alternative would not achieve any of the applicant's project objectives. Therefore, development consistent with the existing Community Plan is not studied in detail in this EIR.

8.4 Alternatives Considered in Detail

The following three alternatives are provided to reduce or eliminate the project's potential for significant impacts to biological resources, historical resources, noise, and TCRs:

- No Project/No Development Alternative
- Reduced Residential Development Alternative
- Reduced Project Alternative

The alternatives analysis provided herein is compared to the impacts associated with the project, in accordance with CEQA Guidelines Section 15126.6(d). The three alternatives discussed below represent a reasonable range of alternatives, as defined in the CEQA Guidelines, because they present feasible alternate development scenarios that would reduce and/or eliminate significant impacts associated with the project.

8.4.1 No Project/No Development Alternative

Consideration of a no project alternative is required by CEQA Guidelines Section 15126.6(e). The analysis of a no project alternative must discuss the existing conditions at the time the NOP was published (i.e., October 22, 2021), as well as “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” [CEQA Guidelines Section 15126.6(e)(2)]. The requirements also specify that, “If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed” [CEQA Guidelines Section 15126.6(e)(3)(B)]. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving a project with the impacts of not approving the project.

Under the No Project/No Development Alternative for this EIR, construction of the project would not occur. The site would remain as described in Chapter 2, *Environmental Setting*, and no changes to the existing site would occur under the No Project/No Development Alternative. Because a new church/sanctuary building would not be constructed, this alternative would not achieve the project’s basic objectives related to relocating the facility to a church-owned property that has proximity to its existing congregation; establishing a place of worship that would accommodate the space needs of its staff and congregation; addressing the parking needs on Sundays by constructing an on-site parking structure; develop the church/sanctuary near where transit connections occur; and enhancing the religious, spiritual, and community-building activities through the design and character of the indoor and outdoor spaces.

8.4.1.1 Comparison of the Impacts from the No Project/No Development Alternative to the Project

Land Use

Under the No Project/No Development Alternative, the project site would remain vacant and undeveloped. No institutional development would be constructed on site. The property would continue to be designated and zoned for residential development. This alternative would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, community plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. This alternative would not avoid or reduce any significant land use impacts, given that the project’s impact would be less than significant.

Biological Resources

The project site features both native and non-native habitats, which would continue to exist on site under the No Project/No Development Alternative. Because of the site’s location within an urbanized area, no impacts to wildlife corridors or migratory wildlife species would occur under the alternative and the project. Over time, the on-site habitat may continue to be subjected to indirect effects, such as erosion, litter, lighting, noise, and invasive species, given its position in an urbanized setting. The potentially significant, but mitigable, direct impacts to sensitive habitats and species caused by the project would be avoided by this alternative.

Historical Resources

As no prehistoric cultural resources were identified on site, this alternative would not result in any direct impacts to known archaeological resources. There would be no need for mitigation given that the No Project/No Development Alternative would not result in construction that would lead to potentially significant impacts to unknown historical (cultural) resources. This alternative would avoid the project's potentially significant, but mitigable, impacts to unknown archaeological resources.

Noise

No construction or operational noise sources would be created on the project site under the No Project/No Development Alternative. Although operational transportation noise would be less than significant for the project, this alternative would result in no increase in off-site transportation noise levels. Because no grading, construction, or any other site disturbance would occur, the No Project/No Development Alternative would also avoid the project's potentially significant impacts from construction noise, which could affect nearby sensitive receptors.

Visual Effects and Neighborhood Character

The No Project/No Development Alternative would not alter views in the project area; however, since none of the public vantage points in the project area are designated as view corridors by the Community Plan, no impact would be avoided. Retention of the site in its vacant and undeveloped state would not damage scenic resources as none occur on site. Without any construction proposed, there would be no new structures built on site. In terms of the effects of bulk and scale on visual character or quality of the site and surroundings, this alternative would avoid the project's less-than-significant impacts to visual quality and neighborhood character.

Tribal Cultural Resources

No known TCRs were identified on the project site. The No Project/No Development Alternative would not result in ground disturbance or construction activities that could lead to the discovery of unknown TCRs. The discovery of such resources would be a potentially significant impact; however, this alternative would avoid the potentially significant, but mitigable, impacts associated with the discovery of unknown TCRs.

8.4.2 Reduced Residential Development Alternative

Under this alternative, the property would be developed with the Marburn Corporation residential subdivision which was approved by the City Council in 2018 (Project No. 435438). Similar to the project, this alternative required approval of a Site Development Permit (SDP), Planned Development Permit (PDP), Easement Vacations, and Tentative Map (TM). Similar to the project, several deviations from the LDC are needed to implement this alternative. A Community Plan Amendment (CPA) is not required to implement the residential development. Despite the RS-1-7 development allowances outlined under the No Project/Existing Community Plan Alternative that permit more residential units, the Reduced Residential Development Alternative consists of the construction of 24 residential units, five homeowner association lots, private access to the property, and other site improvements. The alternative also includes 12-foot-high masonry walls around the

site perimeter with landscape screening. Nearly the entire project site would be graded to implement this alternative. The approved site plan for this alternative is provided in **Figure 8-1, Reduced Residential Development Alternative**. The below environmental analysis is a summary of the relevant portions of the Mitigated Negative Declaration (SCH No. 2017051071) and its technical reports adopted as part of the prior approvals, which are incorporated by reference herein (City of San Diego 2017), in accordance with CEQA Guidelines Section 15150.

8.4.2.1 Comparison of the Impacts from the Reduced Residential Development Alternative to the Project

Land Use

This alternative is compatible with the residential land use designation and zoning for the project site and is consistent with the existing underlying zone. A PDP was required for four deviations: to create buildable lots without frontage on a dedicated public right-of-way; to create residential lots which take access from a private drive; to reduce the front- and rear-yard setback for certain units; and to allow certain lots to deviate from the minimum required lot depth.

Due to the project site's proximity to the freeway and College Avenue, the Reduced Residential Development Alternative would not be considered a compatible land use given the exterior noise environment on site (i.e., greater than 65 dB CNEL as shown in Section 5.4 of this EIR) based on the Land Use-Noise Compatibility Criteria in the Noise Element of the General Plan. Exterior use areas for the residential development would be considered "conditionally acceptable." To implement the project and comply with the land use compatibility policy in the Noise Element, noise walls and/or enhanced building materials and mechanical ventilation would likely be required. In contrast, the institutional land use associated with the project would be consistent with the Noise Element policies given that outdoor usable open space is not required. No significant land use impacts would be avoided by this alternative.

Biological Resources

The Reduced Residential Development Alternative would disturb 3.0 acres of Tier II Diegan coastal sage scrub and 0.6 acres of Tier IIIB non-native grasslands, resulting in similar significant impacts to sensitive habitat as the project and would require similar mitigation (i.e., payment into the City's habitat acquisition fund). Both this alternative and the project would require construction monitoring to mitigate for significant indirect impacts to sensitive habitats. No impacts to wetlands or jurisdictional areas would occur for this alternative similar to the proposed project. Because of the site's location within an urbanized area, no impacts to wildlife corridors or migratory wildlife species would occur under the alternative and the project. The alternative project would be consistent with all the goals and policies in the City's Multiple Species Conservation Plan related to the protection of biological resources, including the need to get an SDP for impacts to sensitive biological resources. This alternative's potentially significant, but mitigable, impacts to biological resources would be substantially similar to those of the project.

Historical Resources

Similar to the project, no prehistoric cultural resources were identified on site; however, the project area is known to contain significant archaeological resources and the potential would exist for significant impacts to unknown cultural resources. Mitigation in the form of construction monitoring would be required during the implementation of the Reduced Residential Development Alternative. This alternative's potentially significant, but mitigable, impacts to historical (cultural) resources would be substantially similar to those of the project.

Noise

Both the project and the Reduced Residential Development Alternative would contribute to increases in traffic noise in the project vicinity; as compared to the church project, this residential alternative would produce a similar level of traffic related noise due to similar trip generating characteristics (i.e., 260 trips for the alternative versus 280 trips for the project). In both cases, the increase in traffic noise would not exceed the City's noise criteria and less than significant transportation noise impacts would arise in the local community. Daily construction noise would be produced by this alternative similar to the project. The acoustical analysis conducted for this alternative determined that construction noise would be temporary in nature and the residential development would be required to comply with the noise limits in the San Diego Municipal Code (SDMC). Compliance with these regulations would require the development to implement standard noise control measures, such as ensuring all equipment is properly maintained and that equipment mufflers and noise enclosures are used. In addition, noise mitigation measures were identified in this alternative's acoustical analysis in order to further reduce construction noise to acceptable noise levels (Davy & Associates 2016). As described in Section 5.4 of this EIR, noise control would also be required to reduce the project's construction noise impacts to less than significant. During the long-term operation of the Reduced Residential Development Alternative, noise levels would be typical of residential uses and would not result in an increase in the existing ambient noise levels or result in noise levels in excess of standards established in the City of San Diego General Plan or Noise Ordinance. Similar to the Project, operational noise levels would be less than significant, and no mitigation would be required. Therefore, this alternative would result in substantially similar significant impacts from construction and operational noise as the project.

Visual Effects and Neighborhood Character

The Reduced Residential Development Alternative would alter views in the project area; however, none of the public vantage points are designated as view corridors by the Community Plan, as described in Section 5.5 of this EIR. No impacts to a designated scenic vista would occur, similar to the project. As with the project, this alternative would not damage scenic resources as none occur on site. The Reduced Residential Development Alternative would construct residences that would comply with the height and bulk regulations in the RS-1-7 zone whereas the project is requesting deviations from the height regulations to accommodate the roofline and cross on the church/sanctuary building. Therefore, the Reduced Residential Development Alternative would directly align with the height and bulk regulations in the LDC, as compared to the project. In terms of the effects of bulk and scale on visual character or quality of the site and surroundings, both the project and this alternative would result in less-than-significant impacts.

Tribal Cultural Resources

The Reduced Residential Development Alternative would result in grading at the site, at a scale similar to the project. No TCRs were identified on site; however, the potential would exist for significant impacts to unknown TCRs to occur under the Reduced Residential Development Alternative. Mitigation in the form of construction monitoring would be required during the implementation of the Reduced Residential Development Alternative. This alternative's potentially significant, but mitigable, impacts to TCRs would be substantially similar to those of the project.

8.4.3 Reduced Project Alternative

In an effort to reduce the potentially significant, but mitigable, impacts associated with constructing the project, a Reduced Project Alternative is evaluated that would reduce the amount of on-site grading required to implement the project. A reduced grading footprint would, in turn, reduce the project's significant impacts to biological resources, historical resources and TCRs. Under the Reduced Project Alternative, the project's surface parking would be modified to comply with the City's parking regulations, rather than constructing 37 more parking spaces than required by the City. Specifically, the Reduced Project Alternative would construct a total of 319 parking spaces, which would be 37 fewer spaces than the project is providing but would comply with the City parking requirements. Surface parking for the project is proposed north of the parking structure and along the eastern edge of the parking structure and church/sanctuary building as shown on the site plan in Figure 3-1. To construct 37 fewer parking spaces, the project's grading footprint would be reduced by approximately 0.4 acres, depending on which spaces are removed under this alternative. All other features of the project would remain the same as described in Chapter 3, *Project Description*.

8.4.3.1 Comparison of the Impacts from the Reduced Project Alternative to the Project

Land Use

Similar to the project, implementation of the Reduced Project Alternative would require approval of a CPA, SDP, PDP, TM and Easement Vacation. Reduction in the quantity of parking spaces would not require an additional deviation from the RS-1-7 regulations as this alternative would comply with the minimum parking standards in the SDMC. The Reduced Project Alternative would be consistent with applicable policies from the General Plan and Community Plan similar to the project. From a Noise Element perspective, institutional land uses, such as proposed by the Reduced Project Alternative and the project, would be compatible with the existing noise exposure on site. There would be no conflicts with applicable plans or policies under this alternative and the project.

Biological Resources

Implementation of the Reduced Project Alternative would have the potential to reduce but not eliminate the project's impact to sensitive habitat, such as Diegan coastal sage scrub and non-native grassland, as shown in Figure 5.2-1 up to approximately 0.4 acres. As such, similar mitigation (i.e., payment into the City's habitat acquisition fund) would be required for this alternative. No impacts to wetlands or jurisdictional areas are expected for this alternative similar to the project. Because of the site's location within an urbanized area, no impacts to wildlife corridors or migratory wildlife

species would occur under the alternative and the project. This alternative's potentially significant, but mitigable, impacts to biological resources would be reduced from levels associated with the project.

Historical Resources

Because no prehistoric cultural resources were identified on site, no direct impacts to cultural (archaeological) resources would occur under the Reduced Project Alternative, as is the case for the project. However, the project area is known to contain significant archaeological resources and the potential would still exist for significant impacts to unknown cultural resources. Reduction of the graded footprint would reduce the potential for causing impacts to cultural resources; however, mitigation in the form of construction monitoring would still be required by this alternative. This alternative's significant impacts to historical (cultural) resources would be slightly less than those of the project.

Noise

Because a similar amount of daily construction activity would be required to implement this alternative, potentially significant impacts from construction noise associated with this alternative would still affect nearby sensitive receptors, similar to the project. However, reduction in the graded footprint would increase the setback distance between construction activities and the nearby sensitive receptors which could lessen the extent of the construction noise impacts. However, similar mitigation as proposed for the project would be required to ensure this alternative's construction noise complies with the City standard and impacts would be less than significant. This alternative would result in the same institutional use occurring on the project site; thus, operational noise from parking lot and circulation activity associated with this alternative would be similar to or slightly less than that identified for the project and operational impacts would be less than significant. Therefore, the Reduced Project Alternative's noise impacts would be similar to those of the project.

Visual Effects and Neighborhood Character

The Reduced Project Alternative would alter views in the project area; however, none of the public vantage points are designated as view corridors by the Community Plan, as described in Section 5.5 of this EIR. No impacts to a designated scenic vista would occur, similar to the project. As with the project, this alternative would not damage scenic resources as none occur on site. The Reduced Project Alternative would not comply with the height and bulk regulations in the RS-1-7 zone and would require approval of deviations from the height regulations to accommodate the roofline and cross on the church/sanctuary building, similar to the project. Reducing the grading footprint would not substantially change the visual character of the development. In terms of the effects of bulk and scale on visual character or quality of the site and surroundings, both the project and this alternative would result in less-than-significant impacts.

Tribal Cultural Resources

No TCRs are known to occur on the project site; however, there is potential to uncover unknown buried TCRs during ground disturbance. The reduced grading footprint associated with the Reduced Project Alternative would reduce the area disturbed on site, resulting in a reduced potential to impact unknown TCRs. However, for the remainder of the project site that would still be graded under this alternative, the potentially significant, but mitigable, impact associated with the discovery of unknown TCRs would occur. Reduction of the graded footprint would reduce the potential for

causing impacts to TCRs; however, mitigation in the form of construction monitoring would still be required by this alternative. This alternative's potentially significant impacts to TCRs would be slightly less than those of the project, but in both cases, the impact would be less than significant with mitigation.

8.5 Summary of Project Alternatives

The project alternatives discussed in this section are intended to avoid or substantially lessen one or more of the significant impacts identified for the project to below a level of significance. A summary comparison of impact levels for the issues identified as significant under the project is provided in **Table 8-1, Project Alternatives Summary of Impacts**. Pursuant to CEQA Guidelines Section 15126(e)(2), "if the environmentally superior alternative is the 'No Project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Based on that information and the discussions in Sections 8.4.1 through 8.4.3, the Reduced Project Alternative would be the environmentally superior alternative. Specifically, this alternative would reduce the project's potentially significant, but mitigable, biological resources, historical (cultural) resources and TCR impacts by reducing the extent of grading required to implement the project. It would also increase the setback distance between construction activities and the nearby sensitive receptors, thus reducing construction noise impacts of the project.

Table 8-1
PROJECT ALTERNATIVES SUMMARY OF IMPACTS

Environmental Issue ^a	Project	No Project/ No Development Alternative	Reduced Residential Development Alternative	Reduced Project Alternative
Land Use	LS	NI	LS	LS
Biological Resources	SM	NI	SM	SM-
Historical Resources	SM	NI	SM	SM-
Noise	SM	NI	SM	SM-
Visual Effects and Neighborhood Character	LS	NI	LS-	LS
Tribal Cultural Resources	SM	NI	SM	SM-

Notes: SM=significant but mitigable; LS=less than significant; NI=no impact; - = Less than the project; + = More than the project

^a Only the environmental effects contained in Chapter 5 are included in this comparison matrix.

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9. MITIGATION, MONITORING, AND REPORTING PROGRAM

9.1 General Requirements

As lead agency for the project under the California Environmental Quality Act, the City of San Diego will administer the Mitigation, Monitoring, and Reporting Program (MMRP) for the following environmental issue areas as identified in the All Peoples Church Project EIR: Biological Resources, Historical Resources, Noise, and Tribal Cultural Resources. The mitigation measures identified below include all feasible measures from the All Peoples Church Project EIR (SCH No. 2021100394; Project No. 636444). This MMRP shall be made a requirement of project approval.

California Public Resources Code Section 21081.6 requires a lead or responsible agency that approves or carries out a project where an EIR has identified significant environmental effects to adopt a “reporting or monitoring program for adopted or required changes to mitigate or avoid significant environmental effects.” The City of San Diego is the lead agency for the All Peoples Church Project EIR and, therefore, must ensure the enforceability of the MMRP. An EIR has been prepared for this project that addresses potential environmental impacts and, where appropriate, recommends measures to mitigate these impacts. As such, an MMRP is required to ensure that adopted mitigation measures are implemented.

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

1. Prior to the issuance of a Notice to Proceed 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) shall review and approve all construction documents (CDs) (plans, specification, details, etc.) to ensure that MMRP requirements are incorporated into the design.
2. In addition, the ED shall verify that the MMRP conditions/notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading **“ENVIRONMENTAL/MITIGATION REQUIREMENTS.”**
3. These notes must be shown within the first three sheets of the CDs in the format specified for engineering CD 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 DSD 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. **PRE-CONSTRUCTION MEETING IS REQUIRED 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 and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the permit holder's representative(s), job site superintendent, noise control coordinator, and the following consultants:

Qualified Biologist
Qualified Archaeological Monitor
Native American 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, applicant t is also required to call the **RE and MMC at 858.627.3360**
2. **MMRP COMPLIANCE:** This project, Project Tracking System No. 636444 and/or Environmental Document No. 636444, shall conform to the mitigation requirements contained in the associated environmental document and implemented to the satisfaction of the DSD's ED (MMC) and the city engineer (RE). 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 the 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 the RE and MMC BEFORE the work is performed.

3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within 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:

None Required

4. **MONITORING EXHIBITS:** All consultants are required to submit, to the RE and MMC, a monitoring exhibit on a 11x17-inch 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 and MMC for approval per the following schedule:

**Table 9-1
DOCUMENT SUBMITTAL/INSPECTION CHECKLIST**

Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
Biological Resources	Biological Construction Mitigation/Monitoring Exhibit	Prior to Preconstruction Meeting
Historical Resources	Archaeology Report	Archaeology/Historic Site Observation During Construction
Noise	Noise Control Measures	Prior to Preconstruction Meeting
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

9.2 Specific MMRP Issue Area Conditions/Requirements

9.2.1 Biological Resources

BIO-1: Biological Resource Protection during Construction.

I. Prior to Construction

- A. **Biologist Verification** – The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City Biology Guidelines (City of San Diego 2018a), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.
- B. **Preconstruction Meeting** – The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.

- C. **Biological Documents** – The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.
- D. **Biological Construction Mitigation/Monitoring Exhibit** – The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME), which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City Assistant Deputy Director (ADD)/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.
- E. **Resource Delineation** – Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.
- F. **Education** – Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

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

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

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

III. Post Construction Measures

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

BIO-2: Sensitive Habitats. Impacts to 4.0 acres of Diegan coastal sage scrub and non-native grassland shall be mitigated at ratios of 1:1 and 0.5:1 for impacts outside the Multi-Habitat Planning Area (MHPA) and mitigation inside the MHPA, respectively, pursuant to Table 3, *Upland Mitigation Ratios*, in the City's Biology Guidelines (City of San Diego 2018a). Mitigation shall be accomplished via payment into the City's Habitat Acquisition Fund equal to 3.6 acres of habitat.

9.2.2 Historical Resources and Tribal Cultural Resources

HR-1: Cultural Resources (Archaeological Resources) Protection during Construction.

I. Prior to Permit Issuance

A. *Entitlements Plan Check*

- 1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.

B. *Letters of Qualification have been submitted to ADD*

- 1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.

2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.
3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site-specific records search (0.25-mile radius) has been completed. Verification includes, but is not limited to, a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
3. The PI may submit a detailed letter to MMC requesting a reduction to the 0.25-mile radius.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. *Identify Areas to Be Monitored*
 - a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
 - b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).
3. *When Monitoring Will Occur*
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.

- b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor(s) Shall Be Present during Grading/Excavation/Trenching

1. The Archaeological Monitor shall be present full time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances Occupational Safety and Health Administration safety requirements may necessitate modification of the AME.
2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and Section IV.A-D shall commence.
3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.
4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSV). The CSV's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery and shall submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance

1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.
 - b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground-disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.
 - c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (PRC) (Section 5097.98) and State Health and Safety Code (Section 7050.5) shall be undertaken:

A. Notification

1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.
2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate Discovery Site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.
2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.

3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.
- C. *If human remains ARE determined to be Native American:*
1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call.
 2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
 3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.
 4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.
 5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR;
 - b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN
 - c. To protect these sites, the landowner shall do one or more of the following:
 - (1) Record the site with the NAHC;
 - (2) Record an open space or conservation easement; or
 - (3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.
 - d. Upon the discovery of multiple Native American human remains during a ground-disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the

human remains and items associated and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c, above.

D. If human remains are NOT Native American:

1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC Section 5097.98).
3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract:

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
2. The following procedures shall be followed:
 - a. No Discoveries
In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVr and submit to MMC via fax by 8 a.m. of the next business day.
 - b. Discoveries
All discoveries shall be processed and documented using the existing procedures detailed in Section III, During Construction, and Section IV, Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.
 - c. Potentially Significant Discoveries
If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III, During Construction, and Section IV, Discovery of Human Remains, shall be followed.
 - d. The PI shall immediately contact MMC, or by 8 a.m. of the next business day to report and discuss the findings as indicated in Section III.B, unless other specific arrangements have been made.

B. If night and/or weekend work becomes necessary during the course of construction:

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.
 - a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with State of California Department of Parks and Recreation. The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.
2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued.
2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
3. The cost for curation is the responsibility of the property owner.

C. Curation of Artifacts: Accession Agreement and Acceptance Verification

1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.

2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV, Discovery of Human Remains, Subsection 5.

D. *Final Monitoring Report(s)*

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

9.2.3 Noise

NOI-1: Best Management Practices. The following best management practices shall be incorporated into the project drawings and implemented during project construction to ensure sustained construction noise levels do not exceed 75 decibels over a 12-hour period at the nearest sensitive receivers:

- In order to reduce construction noise, a temporary noise barrier or enclosure shall be used along the property lines of adjacent residences to break the line-of-sight between the construction equipment and the adjacent residences. The temporary noise barrier shall consist of a solid plywood fence and/or flexible sound curtains attached to chain-link fencing.
- Barriers such as flexible sound control curtains shall be erected around stationary heavy equipment to minimize the amount of noise on the surrounding land uses to the maximum extent feasible during construction.
- Equipping of all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Electrical power shall be used to run air compressors and similar power tools, where feasible.
- Internal combustion engines shall be equipped with a muffler of a type recommended by the manufacturer and in good repair.
- All diesel equipment shall be operated with closed engine doors and be equipped with factory recommended mufflers.
- Prohibiting unnecessary idling of internal combustion engines.

- Locating stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors. Constructing temporary noise barriers to screen stationary noise-generating equipment when located near adjoining sensitive land uses.
- Utilization of "quiet" air compressors and other stationary noise sources where technology exists.
- Control of noise from construction workers' radios to a point where they are not audible at adjacent residences bordering the project site.
- Notifying of all adjacent residences of the construction schedule, in writing, and provide a written schedule of "noisy" construction activities to the adjacent and nearby residences at least 24 hours prior to initiation of construction activities that could result in substantial noise levels at outdoor or indoor living areas. This notification should include the anticipated hours and duration of construction and a description of noise reduction measures being implemented at the project site. The notification should include the telephone number and/or contact information for the on-site noise control coordinator that neighbors can use for inquiries and/or to submit complaints associated with construction noise.
- Designation of a noise control coordinator who shall be responsible for responding to any complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., bad muffler, etc.) and shall require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.

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11. CERTIFICATION

This document has been completed by the City of San Diego's Environmental Analysis Section under the direction of the Development Services Department Environmental Review Manager and is based on independent analysis and determinations made pursuant to the San Diego Municipal Code Section 128.0103. The following individuals contributed to the fieldwork and/or preparation of this report. Resumes of EIR and technical appendices preparers are on file and available for review at the City of San Diego, Development Services Department, 1222 First Avenue, Fifth Floor, San Diego, California 92101.

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Appendix B – Climate Action Plan Consistency Checklist – Baranek Consulting Group, Inc.

- Kim Baranek, Principal/Senior Project Manager

Appendix C – Biological Technical Report – Alden Environmental, Inc.

- Greg Mason, Senior Biologist

Appendix D – Phase 1 Cultural Resources Survey – Brian F. Smith Associates

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Appendix E – Noise Impact Assessment– ECORP Consulting, Inc.

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Appendix F – Geotechnical Investigation– Advanced Geotechnical Solutions, Inc.

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Appendix G – Air Quality Technical Study and Screening Health Risk Assessment – Bluescape Environmental Inc.

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Appendix H – Preliminary Drainage Study – Pasco Laret Suiter & Associates

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Appendix I – Stormwater Quality Management Plan (SWQMP) – Pasco Laret Suiter & Associates

- William Mack, P.E.

Appendix J – Local Mobility Analysis – LOS Engineering, Inc.

- Justin Rasas, Principal

Appendix K – Vehicle Miles Traveled Analysis – LOS Engineering, Inc.

- Justin Rasas, Principal

Appendix L – Waste Management Plan – Baranek Consulting Group, Inc.

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Location Map

All Peoples Church/Project No. 636444

City of San Diego – Development Services Department

FIGURE

No. 1



Site Plan

All Peoples Church/Project No. 636444

City of San Diego – Development Services Department

FIGURE

No. 2