



THE CITY OF SAN DIEGO

ENVIRONMENTAL IMPACT REPORT

Project No. 562674
SCH No. 2017111027

SUBJECT: Witt Mission Valley: A request for a SITE DEVELOPMENT PERMIT and PLANNED DEVELOPMENT PERMIT to demolish 38,070-square-feet of existing structures and on-site surface parking, and construct a 527,760-square-foot mixed-use development comprised of: 267 multi-family residential units and ten shopkeeper units (277 total units) totaling approximately 343,160-square-feet; 6,000-square-feet of retail space; and 3,600-square-feet of commercial space. The project would range in height from one-story to five stories. Parking would be provided in a central five-story, above-ground parking structure wrapped with residential units. A total of 422 parking spaces would be provided in the parking structure in addition to 56 surface parking spaces, for a total of 478 parking spaces. Various site improvements would also be constructed that include associated hardscape and landscape and resident amenity spaces. An allowable deviation from the development regulations is being requested pertaining to sidewalk and pathway widths. The project would incorporate a photovoltaic system consisting of solar panels sufficient to generate at least 50 percent for the residential component consumption and 30 percent for the commercial and retail uses consumption consistent with the requirements of the Sustainable Building Expedite Program. The 5.13 acre project site is located at 588 Camino Del Rio North. The project site is designated Commercial Retail and is zoned MV-CR per the Mission Valley Community Plan. Additionally, the project site is within the Airport Land Use Compatibility Overlay Zone (Montgomery Field), the Airport Influence Area (Montgomery Field and San Diego International Airport (SDIA), Review Area 2), the Federal Aviation Administration Part 77 Noticing Area (Montgomery Field and SDIA), the Residential Tandem Parking Overlay Zone, and the Transit Area Overlay Zone. (Legal Description: Parcels 1 and 2 of Parcel Map No. 17806.) Applicant: Josh Vasbinder, Din/Cal3, Inc.

UPDATE: May 02, 2019. Clarifications and/or revisions, additional information, and typographical corrections have been made to the final Environmental Impact Report when compared to draft environmental document. In accordance with the California Environmental Quality Act (CEQA) Section 15088.5, the addition of new information that clarifies, amplifies, or makes insignificant modifications and would not result in new impacts or no new mitigation does not require recirculation. Pursuant to Section 15088.5(a) of the CEQA Guidelines "Significant new information" requiring recirculation includes for example, a disclosure of additional data or other information showing that:

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

The modifications made in the final environmental document do not affect the analysis or conclusions of the Environmental Impact Report. All revisions are shown in a ~~strikethrough~~ and/or underline format.

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, Transportation/Circulation, Visual Effects/Neighborhood Character, Air Quality, Greenhouse Gas Emissions, Energy, Noise, Historical Resources, Tribal Cultural Resources, Health and Safety, Public Services and Facilities, and Public Utilities.**

The EIR concluded that the project would result in significant but mitigated environmental impacts to **Transportation/Circulation, Historical Resources, and Tribal Cultural Resources**. The project would not result in impacts that would be significant and unmitigated. 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 were distributed either the Public Notice or a copy of the draft Environmental Impact Report:

State of California

Caltrans District 11 (31)
State Clearinghouse (46A)
California Department of Transportation (51)
California Transportation Commission (51A)
California Transportation Commission (51B)
California Native American Heritage Commission (222)

City of San Diego

Mayor's Office (91)
Councilmember Bry, District 1 (MS 10A)
Councilmember Campbell, District 2 (MS 10A)
Councilmember Ward, District 3 (MS 10A)
Councilmember Montgomery, District 4 (MS 10A)
Councilmember Kersey, District 5 (MS 10A)
Councilmember Cate, District 6 (MS 10A)
Councilmember Sherman, District 7 (MS 10A)
Councilmember Moreno, District 8 (MS 10A)
Councilmember Gomez, District 9 (MS 10A)
Development Services Department
 EAS
 Transportation
 LDR Planning
 Engineering
 Geology
 Landscape
 Plan-Historic
 PUD Water & Sewer
 Project Manager
Planning Department
 Plan-Long Range Planning
 Park and Recreation
 Plan Facilities Financing
San Diego Police Department
San Diego Fire-Rescue Department
Environmental Services Department
Transportation Development - DSD (78)
Development Coordination (78A)
Fire and Life Safety Services (79)
Library Department - Government Documents (81)
Central Library (81A)
Mission Valley Branch Library (81R)

City of San Diego - continued

Historical Resources Board (87)

City Attorney (93C)

Other Interested Groups, Organizations, and Individuals

San Diego Association of Governments (108)

San Diego County Regional Airport Authority (110)

San Diego Transit Corporation (112)

Metropolitan Transit System (115)

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 (218)

Kumeyaay Cultural Heritage Preservation (223)

Kumeyaay Cultural Repatriation Committee (225)

Native American Distribution [Notice Only] (225A-S)

Clint Linton, Iipay Nation of Santa Ysabel

Lisa Cumper, Jamul Indian Village

Jesse Pinto, Jamul Indian Village

Mission Valley Center Association (328)

Friars Village HOA (328A)

Mary Johnson (328B)

Mission Valley Community Council (328C)

Union Tribune News (329)

San Diego River Conservancy (330A)

Friends of the Mission Valley Preserve (330B)

Mission Valley Planning Group (331)

Mr. Gene Kemp, General Manager, Fashion Valley (332)

The San Diego River Park Foundation (333)

The San Diego River Coalition (334)

Matt Strabone, Strabone Law

Golden State Environmental Justice Alliance

Richard Drury, Lozeau Drury LLP / richard@lozeaudrury.com

Michael Lozeau, Lozeau Drury LLP / michael@lozeaudrury.com

Komalpreet Toor, Lozeau Drury LLP / komal@lozeaudrury.com

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Other Interested Groups, Organizations, and Individuals - continued

jbourg2271@2271@aol.com

Josh Vasbinder, Din/Cal3., Applicant

Karen Ruggles, KLR Planning, Consultant

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.
- (X) Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.

Copies of the Environmental Impact Report, the Mitigation Monitoring and Reporting Program, and any technical appendices are available in the office of the Development Services Department for review, or for purchase at the cost of reproduction.



Gary Geiler
Deputy Director
Development Services Department

November 21, 2018

Date of Draft Report

May 02, 2019

Date of Final Report

Analyst: Shearer-Nguyen

LETTERS OF COMMENTS AND RESPONSES

WITT MISSION VALLEY PROJECT DRAFT EIR COMMENT LETTERS

The following comment letters were received from agencies, organizations, and individuals during the public review of the Draft EIR. A copy of each comment letter along with corresponding staff responses has been included.

Comment letters on the Draft Environmental Impact Report (Draft EIR) were received from the following agencies, organizations and individuals (Table 1). Several comment letters received during the Draft EIR public review period contained requests for revisions that resulted in minor changes and text clarifications to the Draft EIR text. These changes to the text are indicated by strikeout (deleted) and underline (inserted) markings. Some of the comments do not pertain to the adequacy of analysis in the Draft EIR or to other aspects pertinent to the potential effects of the proposed project on the environment pursuant to CEQA. However, a good faith effort has been made by the City to respond to the comments submitted. Each comment letter is reproduced alongside the corresponding responses to individual comments.

Table 1. Comment Letters Received

Letter	Author	Address	Date	Representing	Page Number of Letter
LOCAL AGENCIES					
A	Scott Morgan Director, State Clearinghouse	State of California Governor's Office of Planning and Research State Clearinghouse and Planning Unit 1400 Tenth Street/P.O. Box 3044 Sacramento, CA 95812-3044	January 7, 2019	State of California Governor's Office of Planning and Research State Clearinghouse and Planning Unit	3
B	Board of Directors	Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877	December 6, 2018	Golden State Environmental Justice Alliance	5
C	Richard T. Drury	Lozeau Drury LLP 410 12 th Street, Suite 250 Oakland, CA 94607	December 20, 2018	Laborers International Union of North America, Local Union 89	20
D	James W. Royle, Jr. Chairperson Environmental Review Committee	San Diego County Archaeological Society, Inc. P.O. Box 81106 San Diego, CA 92138-1106	January 6, 2019	San Diego County Archaeological Society	21
E	Nicholas Whipps	Wittwer Parkin LLP 147 S. River Street, Suite 221 Santa Cruz, CA 95060	January 7, 2019	Southwestern Regional Council of Carpenters	22
F	Seth Litchney Senior Regional Planner	SANDAG 401 B Street, Suite 800 San Diego, CA 92101	January 7, 2019	San Diego Association of Governments	52

LETTERS OF COMMENTS AND RESPONSES



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



January 7, 2019

RECEIVED

JAN 14 2019

Development Services

Elizabeth Shearer-Nguyen
City of San Diego
1222 First Avenue, MS-501
San Diego, CA 92101

Subject: Witt Mission Valley
SCH#: 2017111027

Dear Elizabeth Shearer-Nguyen:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on January 4, 2019, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL 1-916-445-0613 state.clearinghouse@opr.ca.gov www.opr.ca.gov

A-1

A-1 This letter acknowledges compliance with the State Clearinghouse review requirements for draft environmental documents.

A-1
Cont.

Document Details Report State Clearinghouse Data Base			
SCH#	2017111027		
Project Title	Witt Mission Valley		
Lead Agency	San Diego, City of		
Type	EIR Draft EIR		
Description	A request for a site development permit and planned development permit demolish 38,070 sf of existing structures and on-site surface parking and construct a 527,760 sf mixed use development comprised of 267 multi-family residential units and ten shopkeeper units totaling approx 343,160 sf, 6,000 sf of retail space, and 3,800 sf of commercial space. The project would range in height from one-story to five stories. Parking would be provided in a central five-story, above-ground parking structure wrapped with residential units. A total of 422 parking spaces would be provided in the parking structure and 56 surface parking spaces, for a total of 478 parking spaces. Various site improvements would also be constructed that includes associated hardscape and landscape and resident amenity spaces. The project would incorporate a pv system consisting of solar panels sufficient to generate at least 50% for the residential component consumption and 30% for the commercial and retail uses consumption consistent with the requirements of the Sustainable Building Expedite Program.		
Lead Agency Contact			
Name	Elizabeth Shearer-Nguyen		
Agency	City of San Diego		
Phone	(619) 446-5369	Fax	
email			
Address	1222 First Avenue, MS-501		
City	San Diego	State	CA Zip 92101
Project Location			
County	San Diego		
City	San Diego		
Region			
Lat / Long	32.765042° N / 117.159627° W		
Cross Streets	Camino De La Siesta/Camino Del Arroyo/Camino De La Reina		
Parcel No.	438-020-7400		
Township	Range	Section	Base
Proximity to:			
Highways	I-8, I-805		
Airports			
Railways	Fashion Valley Transit Ctr.		
Waterways	San Diego River		
Schools			
Land Use	Commercial retail/MV-CR/Commercial employment, retail, and services		
Project Issues	Air Quality; Archaeologic-Historic; Geologic/Seismic; Noise; Public Services; Traffic/Circulation; Water Quality; Landuse; Cumulative Effects; Other Issues; Tribal Cultural Resources; Aesthetic/Visual		
Reviewing Agencies	Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 11; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; State Water Resources Control Board, Division of Water Quality; Resources, Recycling and Recovery; California Energy Commission; Native American Heritage Commission; Public Utilities Commission; San Diego River Conservancy; Department of Housing and Community Development		
Date Received	11/21/2018	Start of Review	11/21/2018 End of Review 01/04/2019
Note: Blanks in data fields result from insufficient information provided by lead agency.			

Page 1 of 5



December 6, 2018

VIA EMAIL

Elizabeth Shearer-Nguyen, Environmental Analyst
Development Services Department
City of San Diego
1222 1st Avenue, MS 501
San Diego, CA 92101
EShearer@sandiego.gov
DSDEAS@sandiego.gov

SUBJECT: COMMENTS ON WITT MISSION VALLEY EIR (PROJECT NO. 562674 / SCH NO. 2017111027)

To whom it may concern:

B-1

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Witt Mission Valley Project EIR. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

B-2

1.0 Summary

As we understand it, the project proposes demolition of an existing auto dealership and repair shop (38,070 square feet of structures) and associated on-site surface parking and construction of a mixed-use development consisting of 277 multi-family residential units (including 10

B-1

Comment noted. Golden State Environmental Justice Alliance has been added to the project's public interest list, as requested.

B-2

Comment noted. This comment provides a brief summary of project features and discretionary actions. It should be noted that in addition to the information provided here by the commenter, the project incorporates a photovoltaic system in order to meet the requirements of the Sustainable Building Expedite Program (50 percent of residential energy consumption generated on-site and 30 percent of commercial energy consumption generated on-site).

<p>B-2 (cont.)</p> <p>B-3</p> <p>B-4</p>	<p style="text-align: right;">Page 2 of 5</p> <p>shopkeeper units), 2,500 square feet of commercial retail space, 3,500 square feet of high-turnover sit-down restaurant space, and 3,600 square feet of commercial office space on a 5.13 acre site. The project would provide a total of 478 parking spaces, where 431 are required. A five-story, above ground parking structure would be situated at the center of the project site wrapped by the residential units to provide a total of 422 parking spaces. The balance of 56 parking spaces would be provided as surface parking. The project requires approval of a Site Development Permit and a Planned Development Permit.</p> <p>5.2 Transportation/Circulation</p> <p>The EIR utilizes the City of San Diego's May 2003 Trip Generation Manual to estimate project traffic generation. The EIR also utilized driveway rates with mixed-use and transit reductions from the SANDAG MXD model obtained for the Millennium (Camino Del Rio Mixed-Use) project and assumed credit for the Witt Lincoln dealership currently operating on the project site. The EIR does not include background information regarding the MXD credit or how the project is entitled to utilize such a credit to reduce traffic impacts. Further, the Millennium SANDAG MXD model is <i>listed</i> as Appendix A of Appendix D - Focused Transportation Study, but is not <i>included</i> as part of the EIR for public review. CEQA § 15150 (f) states that incorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand. The Millennium SANDAG MXD model contributes directly to the analysis of the problem at hand. Not including this information in the EIR or technical appendix as an attachment for public review is in violation of CEQA § 15150 (f). The EIR must be revised and recirculated for public review to include this information in order to be an adequate informational document.</p> <p>The EIR provides skewed analysis regarding the project's compliance with Chapter 15, Article 14 of the City of San Diego, Municipal Code rules for the Mission Valley PDO Development Intensity District G, which is "limited by the number of average daily trips (ADT) generated by the existing and proposed land uses of any development proposal." According to Table 1514-03A in the MVPDO, up to 344 ADT per gross acre are allowed within Development Threshold 2. For the 5.13-acre project site, the Community Plan would allow up to 1,765 ADT within the allowable development thresholds. Based on the MVPDO trip rates, the EIR concludes "the project would generate 1,638 ADT, taking into account a MXD credit. Therefore, the project would be within the Threshold 2 limits established by the MVPDO." This conclusion is misleading to the public and decision makers because the EIR does not disclose that the project will generate 1,974 ADT total. An MXD credit of 17% trip reduction decreases the ADT of the project by 336 ADT, enabling the project to generate just under the maximum 1,765 ADT</p>	<p>B-3 The Focused Transportation Study was prepared for the project by Urban Systems Associates, Inc. (February 12, 2018) and was included as Appendix D to the Draft EIR and summarized in Section 5.2. The Draft EIR, pages 5.2-5 and 5.2-6 of the Transportation/Circulation Section, provides an explanation of the Mixed-Use Development (MXD) credit as well as the SANDAG "MDX model", including background regarding the model and the reason for using it to adjust trip generation.</p> <p>Consistent with the requirements of CEQA Section 15150, Incorporation By Reference, the Public Notice identified that the supporting documents were available for review at the Development Services Department, located 1222 First Avenue, San Diego, CA 92101. The documents were available during the public review period. Therefore, the environmental document does not require recirculation as suggested by the commenter.</p> <p>Appendix D does not state that the MXD model is included in Appendix A of that document, contrary to the comment. The listing for Appendix A states, "Camino Del Rio Mixed-Use Project Trip Distribution & SANDAG Series 11 Traffic Model and Select Zone Plot". The SANDAG, Series 11 traffic model listed is not the same as an MXD model. Therefore, the reference is correct.</p> <p>As discussed in Section 5.2 of the EIR under Project Trip Generation, an MXD adjustment was utilized in calculating the trip generation for Witt Mission Valley. This MXD adjustment was based on the approved MXD adjustment that the neighboring Millennium 1 (formerly Camino Del Rio Mixed-Use) project applied, based on the SANDAG MXD model. The Millennium 1 project is substantially similar to the project, in that it included a comparable mix of uses and residential unit types on a comparable lot size and orientation.</p> <p>As the Witt Mission Valley project would result in a net increase in trip generation less than 1,000 ADT, a full transportation impact study was not required and no new SANDAG model was prepared specific to the Witt Mission Valley project. Instead, information from the Camino Del Rio Mixed-Use project was utilized to determine trip distribution, as well as trip generation adjustments for the Witt Mission Valley project.</p> <p>B-4 The Mission Valley Planned District Ordinance (PDO) contains the Development Intensity Overlay District, which limits development intensity to the levels allowed under the adopted Community Plan.</p>
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LETTERS OF COMMENTS AND RESPONSES

	<p>For the 5.13-acre site, the project is allowed up to 1,765 ADT. As noted in Section 5.2 of the EIR and shown on Table 5.2-3, <i>Witt Mission Valley Trip Generation</i>, MXD adjustments were taken for the project. These adjustments were the same as those made for the Camino Del Rio Mixed-Use project, which was appropriate because the Camino Del Rio Mixed-Use project was “nearly identical land uses and residential density and is immediately adjacent to the Witt Mission Valley project site” (TIA pg. 19). In determining trip generation for purposes of the DID, Table 1514-03B is utilized. Per Table 1514-03B, Multi-family (30 or more du/ac) generates 1,662 ADT (six trips/unit x 277 units), Commercial Office generates 72 ADT (20 trips/1,000 square feet x 3,600 square feet), Freestanding Retail/Strip Commercial generates 100 ADT (40 trips/1,000 square feet x 2,500 square feet), and Restaurants generates 140 ADT (40 trips/1,000 square feet x 3,500 square feet). This trip generation results in a subtotal of 1,974 ADT. The MXD credit of 17 percent applies to this project, which represents a 336 ADT reduction, resulting in 1,638 ADT. Because the project would generate less than 1,765 ADT, it is consistent with the requirements of DID G Threshold 2.</p>
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LETTERS OF COMMENTS AND RESPONSES

<p>B-4 (cont.)</p> <p>B5</p> <p>B-6</p> <p>B-7</p>	<p style="text-align: right;">Page 3 of 5</p> <p>permitted. Again, there is no information given regarding the source of the MXD credit, or how the arbitrary 17% reduction was established for this proposed project or the Millennium project. The EIR must be revised and recirculated to include this information for public review.</p> <p>Additionally, the EIR must be revised to be internally consistent. The Air Quality Analysis utilizes the actual project ADT generated (1,954 ADT) for analysis, which is the most conservative method to present a “worst-case scenario” of project environmental impacts. The Transportation Analysis must be revised to be consistent with the Air Quality Analysis and utilize the actual project ADT generated (1,954 ADT) for analysis in order to present a conservative “worst-case scenario” of project environmental impacts.</p> <p>The EIR does not provide any analysis of potentially significant traffic impacts during construction of the project. Traffic analysis during construction is especially necessary as 28,900 cubic yards of fill will be required to be imported to raise the elevation of the property to comply with FEMA flood protection requirements. Assuming a standard 10 cubic yard capacity for each haul truck, the project would generate at minimum 2,890 haul truck trips during the construction process. The EIR must be revised and recirculated for public review to include analysis of potentially significant traffic impacts during project construction in order to be an adequate informational document.</p> <p>The EIR concludes that the project “would not result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or metered freeway ramp.” The EIR utilizes “criteria and threshold established in the City of San Diego Traffic Impact Study Manual and SANDAG’s Congestion Management Program” but does not state what the thresholds are or quantify how the project will not exceed those thresholds. Further, Section 4.5 of Appendix D states, “To determine the LOS of main-lane freeway segments, a V/C analysis would be conducted consistent with California Department of Transportation (Caltrans) District 11 Procedures for Estimating Freeway Level of Service. This analysis study area does not include any freeway or freeway ramps so these procedures have not been utilized.” The Technical Transportation Appendix states that the freeway segments and ramps were excluded from the study area altogether. This does not coincide with the EIR’s conclusion that the project “would not result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or metered freeway ramp,” especially when the project site has immediate access to the 5 freeway and the 163 freeway via Camino Del Rio North.</p>	<p>B-5 As noted in Table 5.2-3 of the draft EIR, the project’s trip generation is 1,945 ADT, which represents the total project trips generated prior to subtracting the trips generated by existing uses on the site. Table 5.2-3 also shows that existing uses on site are calculated to generate 1,373 ADT, leading to a net increase in traffic to the surrounding roadways and community of 581 ADT. As this calculation is fully discussed and documented, no change to the draft EIR is required.</p> <p>As the commenter previously noted, project ADT without reductions taken for MXD credit is 1,954 ADT. As noted by the commenter, the Air Quality Analysis utilized ADT generated by the project without the trip reductions, 1,954 ADT, which represents a more conservative estimate of vehicular air emissions.</p> <p>B-6 During the construction period referenced in the comment (site grading), it is expected that six to 10 truck haul trips per day would be conducted to complete site grading. In addition, site construction traffic would likely peak when framing and drywall construction overlap. At that time, between 60 to 80 people are anticipated onsite. Assuming each truck generates two trips (one in and one out), the trip generation during site grading from the import and grading mentioned would be up to 20 trips. During peak construction, it would be expected that each person on-site would generate an average of three trips. Therefore, up to 240 trips would be anticipated. All of these activities generate far fewer trips than the 1,373 ADT generated by uses existing on the site. As the existing use must be discontinued during construction, existing traffic levels would be expected to decrease during the construction period and no impacts would be anticipated. Therefore, no further analysis would be necessary.</p> <p>B-7 As discussed Section 5.2.2 of the Draft EIR, under Horizon Year 2035 with Project Freeway Segments, the analysis utilized City and regional standard criteria for establishing the study area. For freeway segments mentioned in this comment, the study area criteria is 50 peak hour trips in one direction. As mentioned, no freeways or ramp meters met the criteria.</p> <p>As a point of clarification, there is no access directly to I-5 or SR-163 via Camino Del Rio North, nor is I-5 in close proximity to the project (approximately 2.5 miles away) as identified in the comment. However, Camino Del Rio North does lead to the Mission Center Road interchange with Interstate 8 (I-8). Likewise, via Mission Center Road and Friars Road, the project gains access to SR-163 at the Friars Road/163 Interchange. Each of these interchanges contains ramps which are un-metered.</p>
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LETTERS OF COMMENTS AND RESPONSES

Based on City and regional guidelines, the TIA and EIR uses 20 peak hour trips as the threshold to determine if a project could have an impact on freeway ramps. In order to verify this threshold was applied, a simple calculation can be conducted. Starting with Table 5.2-3 in EIR, it can be seen that the highest net peak hour volume would be 86 trips in the AM peak hour for outbound traffic. Using this number and the 20 trip threshold, it is calculated that a distribution exceeding 23.3 percent of project trips would yield 20 peak hour trips on a freeway on-ramp (20 trips divided by 86 trips). As shown in Figure 5.2-2 in the EIR, none of the freeway on-ramps are shown to have a peak hour distribution of more than 23.2%. Therefore, no freeway ramp would experience a trip increase greater than 20 trips during any peak hour exceeding the analysis threshold. Therefore, no additional analysis of ramp meters would be necessary or appropriate.

B-8

5.4 Air Quality

The EIR utilizes CalEEMod to analyze potentially significant Air Quality impacts. However, the CalEEMod output sheets utilized for analysis in Appendix E - Air Quality Technical Report and the EIR are included as part of the EIR for public review. CEQA § 15150 (f) states that incorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand. The CalEEMod output sheets contribute directly to the analysis of the problem at hand. Not including this information in the EIR or technical appendix as an attachment for public review is in violation of CEQA § 15150 (f). The EIR must be revised and recirculated for public review to include this information in order to be an adequate informational document.

B-9

The EIR identifies the multi-family housing developments located across Camino de la Reina to the north of the site as the nearest sensitive receptors to the property. However, the Millennium residences adjacent to the project site are occupied and will continue to be occupied throughout construction of the proposed project. The EIR must be revised to include analysis of the potentially significant Air Quality impacts on the nearest sensitive receptor, the Millennium residences.

B-10

Appendix E states that project construction “could result in minor amounts of odor compounds associated with diesel heavy equipment exhaust. These compounds would be emitted in various amounts and at various locations during construction.” The EIR and Appendix E do not provide any quantified analysis regarding odor compounds in order to support the EIR’s conclusion that there would be no impacts related to odors. The EIR must be revised to include evidence supporting this conclusion, especially since the nearest sensitive receptors are the Millennium residences adjacent to the project site.

B-11

5.7 Noise

The EIR concludes that there will not be any significant noise impacts to the Millennium residences during construction because the sensitive receptors are located “approximately 200 feet east of the centroid of construction activity on the project site.” With credit for six dBA per doubling distance, the 85 dBA estimated during construction activity is concluded to generate 73 dBA at the Millennium residences, just under San Diego Municipal Code Section 59.5.404 maximum of 75 dBA. The 200 foot doubling distance utilized by the EIR is immaterial as the proposed project’s site plan depicts structures adjacent to the Millennium residences at only a 10 foot setback from the property line. The EIR must be revised to analyze a “worst-case scenario”

B-8

Although not circulated with the draft EIR, all technical appendices were available for review, including the CalEEMod Output associated with the Air Quality Analysis, at the Development Services Department located at 1222 Frist Avenue, San Diego, CA 92101. As such, this information was available to the public for review.

Pursuant to CEQA Guidelines Section 15088.5(a), a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:

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

As the CalEEMod Output was available for public review, this does not represent “significant new information,” and recirculation is not required.

B-9

At the time the air quality analysis was prepared, the Millennium Mission Valley project was under construction to the east of the project site. Sensitive receptors (residents) at Millennium Mission Valley would


LETTERS OF COMMENTS AND RESPONSES

	<p>experience similar impacts relative to air quality as the residences to the north of the project site, due to similar proximity. The project would not expose sensitive receptors to substantial pollutant concentrations in the form of CO hot spots, TACs, or other criteria pollutants. Project impacts would be less than significant.</p> <p>B-10 Section 5.4 of the Draft EIR analyzed potential odors related to project construction and operation. Relative to project construction, minor amounts of odor compounds associated with diesel heavy equipment exhaust could result. These compounds would be emitted in various amounts and at various locations during construction. Odors are highest near the source and would quickly dissipate off-site; any odors associated with construction would be short-term and intermittent in nature, and would cease upon completion of construction. Relative to operation, the project would not be considered a source of objectionable odors during operations. The project proposes a mix of residential and commercial uses and none of the proposed uses would result in the release of objectionable odors. Therefore, any odors present during construction would be temporary and would not affect sensitive receptors (residences). The project does not include land uses that would be sources of nuisance odors.</p> <p>There is no quantifiable standard for odor emissions. However, these emissions are typically associated with pollutants and because the project would not exceed quantifiable standards for the pollutants evaluated, odor impacts during construction would not be significant. Scenarios where odors can be problematic over the long-term are related to processing or manufacturing facilities that emit odors during daily operations. The project does not include these uses; thus, no odor impacts during operation are anticipated. Furthermore, the project would be required to adhere to the San Diego Municipal Code, Section 142.0710, Air Contaminant Regulations.</p> <p>B-11 The City of San Diego metric for evaluating construction noise is Leq (12 hours), which is the average noise level over a 12-hour period. Standard equipment such as scrapers, graders, backhoes, rollers, loaders, tractors, cranes, and miscellaneous trucks would be used for construction of most project facilities. Sound levels of typical construction equipment range from approximately 65 dBA to 95 dBA at 50 feet from the source. Grading operations (which are analyzed to be conservative, as these are typically the noisiest construction operation) typically occur over large areas and can be reasonably expected to utilize the entire project site over a full work day. As such, the use of the project site centroid as the construction noise source is appropriate.</p>
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LETTERS OF COMMENTS AND RESPONSES

	<p>The draft EIR identified that construction of the project would generate a temporary increase in noise in the project area. The increase in noise level would be primarily experienced close to the noise source. The magnitude of the impact would depend on the type of construction activity, noise level generated by various pieces of construction equipment, duration of the construction phase, and distance between the noise source and receiver. The draft EIR acknowledged that worst-case noise levels are typically associated with grading. Noise sources associated with grading of the project, and associated noise levels are shown in Table 5.7-6, <i>Grading Noise Source Levels</i>. Project construction would not require pile driving or on-site rock crushing.</p> <p>Construction noise within the City is governed by Municipal Code Section 59.5.0404: Construction Noise. This code section prohibits construction between the hours of 7:00 P.M. and 7:00 A.M.; on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with some exceptions; or on Sundays. Additionally, construction is prohibited from causing noise in excess of 75 dB during the 12-hour period from 7:00 A.M. to 7:00 P.M. at or beyond the property lines of any property zoned residential.</p> <p>The magnitude of the impact would depend on the type of construction activity, noise level generated by various pieces of construction equipment, duration of the construction phase, and distance between the noise source and receiver.</p> <p>The draft EIR identified that the closest noise-sensitive land uses are multifamily residences located in the Millennium Mission Valley, which were under construction at the time the noise study was prepared), located approximately 200 feet east of the centroid of construction activity on the project site. As discussed above, grading would occur over a large area during the entirety of a work day, and the noise limit is a day-long average. The instantaneous noise level would sometimes be over 75 dBA, and sometimes under 75 dBA, but would average out to 73 dBA over the 12-hour period. Sound from construction equipment drops by six dBA per doubling of distance. Thus, as identified in the Draft EIR, noise levels would be 79 dBA at 100 feet, 73 dBA at 200 feet, etc. Project construction activity could generate up to approximately 73 dBA Leq (12 hours) at residences, which complies with Municipal Code Section 59.5.0404. Therefore, the project would not result in construction noise impacts.</p>
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LETTERS OF COMMENTS AND RESPONSES

<p>B-11 (cont.)</p> <p>B-12</p> <p>B-13</p> <p>B-14</p>	<p style="text-align: right;">Page 5 of 5</p> <p>of construction impacts (especially vital since the entire property is proposed to be filled with 28,900 cubic yards during the grading phase and the proposed location of the project buildings) of the sensitive receptors located at their property line closest to the project site.</p> <p>6.0 Cumulative Effects</p> <p>With regard to Air Quality, the EIR states that any cumulative projects “would also have to achieve applicable standards relative to construction-related emissions,” resulting in no significant cumulative impacts. However, given a lead agency's ability to approve a project notwithstanding significant environmental impacts, this statement is erroneous. The EIR does not discuss or present any analysis regarding the potentially significant cumulative impacts of the project or cumulative, related projects. There is no information given regarding the potentially significant impacts to Air Quality or other areas of environmentally sensitive topics (Greenhouse Gases, Energy, etc) for each cumulative project. The EIR must be revised and circulated for public review in order to adequately and accurately analyze all potentially significant cumulative environmental impacts.</p> <p>Conclusion</p> <p>For the foregoing reasons, GSEJA believes the EIR is flawed and an amended EIR must be prepared for the proposed project and recirculated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.</p> <p>Sincerely,</p>  <p>Board of Directors Golden State Environmental Justice Alliance</p>	<p>B-12 Section 6.0, <i>Cumulative Effects</i>, addresses the project’s cumulative impact when considering other past, present, and probable future projects. CEQA does not require an analysis of the cumulative projects, but rather the proposed project’s contribution in light of other projects.</p> <p>With regards to cumulative Air Quality impacts, the cumulative analysis focuses on whether a specific project would result in a cumulatively considerable increase in emissions. By its very nature, air pollution is largely a cumulative impact. 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 City of San Diego 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. Air quality impacts would be considered cumulatively considerable if: (1) a project’s contribution of air emissions would exceed the NAAQS or CAAQS thresholds for a criteria pollutant that the air basin is in nonattainment for; (2) emissions from project traffic combined with other traffic emissions would create a CO hotspot; or (3) project construction emissions combined with construction emissions from other projects would exceed NAAQS or CAAQS thresholds for criteria pollutants. If a project’s contribution does not exceed the NAAQS or CAAQS thresholds, does not create CO hot spots, and the construction of the project would not exceed the NAAQS and CAAQS, then the project would not be expected to result in a considerable incremental contribution to the significant cumulative impact. The project’s net increase in emissions over existing conditions would not result in the generation of criteria air pollutant emissions that exceed any of the thresholds for construction or operational activities.</p> <p>The project is consistent with the Mission Valley Community Plan and, therefore, has been assumed in regional air quality plans, as stated in the draft EIR. Because the project is consistent with the RAQS, SIP, the General Plan, and the Mission Valley Community Plan, it would not result in a cumulatively considerable increase emissions of ozone precursors (NOx and VOCs). The project would not result in additional emissions over the current assumptions used to develop the General Plan and AQMP. As such, the project would not affect the ability of the RAQS or other regional plans to meet federal and state clean air standards. The project would not exceed 100 pounds per day of PM dust during construction or operational activities. Further, the project’s construction and operational activities</p>
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LETTERS OF COMMENTS AND RESPONSES

	<p>would not create objectionable odors affecting a substantial number of people, and the future residents would not be impacted by any existing odor sources. Construction of the project would not expose sensitive receptors to substantial pollutant concentrations that would result in a health risk. These impacts would be less than significant and not cumulatively considerable. The project's construction and operational emissions throughout the SDAB would not be cumulatively considerable.</p> <p>With regard to GHG Emissions, the geographic scope of consideration for GHG emissions is global, as such emissions contribute, on a cumulative basis, to global climate change. By nature, GHG impacts are cumulative as they are the result of combined worldwide emissions over many years, and additional development would incrementally contribute to this cumulative impact. The discussion presented in Section 5.5, <i>Greenhouse Gas Emissions</i>, also serves as the project's cumulative impact analysis. As detailed in that section, a number of plans, policies, and regulations have been adopted for the purpose of reducing cumulative GHG emissions. The project has incorporated a number of sustainable features into its design to reduce overall emissions, reflecting the types of emissions reduction measures recommended by public agencies to reduce the magnitude of GHG emissions and help California achieve its statewide goals. The project was analyzed for consistency with the City's CAP Consistency Checklist, and would implement reduction measures required for this type and size of project. Further, the Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. As a result, the Project would not result in a cumulatively considerable contribution to impacts related to GHG emissions.</p> <p>As discussed in Section 5.6, <i>Energy</i>, the project proposes a change in use from what has been developed on the site. Similar to other cumulative development projects, implementation of the Project would result in the consumption of energy during both project construction and operation. However, the project would not result in a substantial increase in energy consumption nor would the project use power in excess of that anticipated for the proposed uses. No adverse effects on non-renewable resources are anticipated. The project would comply with the California Building Code (CBC) and Title 24 requirements for energy efficiency in effect at the time of construction that would reduce the project's overall demand for energy. In addition, the project would implement LEED Silver for Homes Certification, as a condition of approval, that would also reduce energy consumption. As such, the project would not result in a cumulatively considerable</p>
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LETTERS OF COMMENTS AND RESPONSES

	<p>contribution to energy resources. Impacts were determined to be less than significant.</p> <p>Other projects constructed within Mission Valley would also be required to follow current or future CBC and Title 24 requirements for energy efficiency that are applicable at the time individual projects come forward. Therefore, a cumulatively considerable impact on energy supplies would not result.</p> <p>B-13 The Draft EIR thoroughly analyzed and disclosed the potentially significant project impacts consistent with CEQA, The EIR fulfills the requirements of CEQA and provides disclosure to decision-makers and the public of project potential effects on the environment. In addition, recirculation is not required.</p> <p>B-14 Comment noted. As stated in Response No. B-1, Golden State Environmental Justice Alliance has been added to the public interest list, as requested.</p>
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Via Email and U.S. Mail

December 20, 2018

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Anna McPherson, Program Manager
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Re: Comment on Draft Environmental Impact Report, Witt Mission Valley Project aka SCH2017111027

Dear Ms. Shearer-Nguyen and Ms. McPherson:

I am writing on behalf of Laborers International Union of North America, Local Union No. 89 and its members living in and around the City of San Diego ("LIUNA") regarding the Draft Environmental Impact Report ("DEIR") prepared for the Project known as Witt Mission Valley Project aka SCH2017111027, including all actions related or referring to the proposed demolition of 38,070 square feet (sf) of existing structures and on-site surface parking and construction of a 527,760 sf mixed use development comprised of 267 multi-family residential units, ten shopkeeper units totaling approximately 343,160 sf, 6,000 sf of retail space, and 3,600 sf of commercial space alongside a central five-story, above-ground parking structure wrapped with residential units located at the cross roads Camino De La Siesta, Camino Del Arroyo and Camino De La Reina on APN 438-020-7400 in the City of San Diego ("Project").

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. LIUNA request that the Development Services Department address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

Sincerely,

Richard T. Drury

C-1

C-1 Comment noted.

C-2

C-2 Comment noted. This comment is vague and does not specifically describe how the Draft EIR fails as an information document and fails to impose all feasible mitigation measure to reduce the Project's impacts. All project impacts were identified and evaluated in the Draft EIR, consistent with CEQA, and measures have been identified to mitigate project impacts to below a level of significance, where applicable. Further, recirculation of the EIR is not warranted. The comment does not raise any specific issue regarding the Draft EIR analysis and, therefore, no more specific response can be provided or is required.



San Diego County Archaeological Society, Inc.
Environmental Review Committee

6 January 2019

To: Ms. Elizabeth Shearer-Nguyen
Development Services Department
City of San Diego
1222 First Avenue, Mail Station 501
San Diego, California 92101

Subject: Draft Environmental Impact Report
Witt Mission Valley
Project No. 562674

Dear Ms. Shearer-Nguyen:

I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

1. Based on the information contained in the DEIR posted on the City's website, we have the following comments:
2. We concur with the conclusion that the project will have no significant impacts on historical (built environment) resources
3. We also concur with the archaeological monitoring program specified in the DEIR.
4. We note that the historic photos for 1906 and 1912, cited on page 5.8-10 and included in Attachment "B", Historic Photographs, are clearly and obviously NOT from those years. This error should be corrected in the FEIR.

Thank you for the opportunity to offer our comments on this DEIR.

Sincerely,

James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: SDCAS President
File

P.O. Box 81106 San Diego, CA 92138-1106 (858) 538 0935

D-1 Comments noted.

D-2 Coordination with staff at the San Diego History Center indicated that the dates on the referenced photos within Attachment E were incorrect, and the correct dates for those photographs are 1977. Section 5.8 of the EIR did not reference these erroneous dates. Attachment E has also been corrected to reflect the correct dates.

wittwer / parkin

January 7, 2019

VIA E-MAIL

Ms. E. Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Department
1222 First Avenue, MS 501
San Diego, California 92101
DSDEAS@sanidiego.gov

**Re: Witt Mission Valley Draft Environmental Impact Report
(Project No. 562674 / SCH No. 2017111027)**

Dear Ms. Shearer-Nguyen:

Wittwer Parkin, LLP represents the Southwest Regional Council of Carpenters ("Southwest Carpenters") and submits this letter on the above-referenced project on its behalf. Southwest Carpenters represents 50,000 union carpenters in six states, including in Southern California. Southwest Carpenters has a strong interest in addressing environmental impacts of development projects, including the proposed mixed-use Witt Mission Valley project at 588 Camino Del Rio North in San Diego, California ("Project").

The Project is located in Mission Valley in the City of San Diego ("City"), on a 5.13-acre lot. (DEIR, p. ES-3.) The Project site is currently used as a car dealership and parking. (*Id.* at pp. 1-1, 2-2, 2-12, 2-13 [showing map of Project site].) In order to construct the Project, the Project Applicant would demolish existing structures and on-site surface parking area. (*Id.* at p. ES-3.) The Project, as proposed, includes 277 residential units, 6,000 square feet of retail space, and 3,600 square feet of office space, a large five-story parking structure with 422 parking spaces, and surface parking with 56 spaces. (*Ibid.*; *id.* at pp. 1-1, 3-2, 3-3.)

In the DEIR, the City of San Diego (City) concludes that the Project would solely result in significant impacts to Transportation/Circulation, Historical Resources, and Tribal Cultural Resources. (DEIR, p. ES-3.) It asserts that mitigation would reduce these impacts to below a level of significance. (*Ibid.*) This is incorrect. As discussed more fully below, the DEIR is confusing, missing key information and analysis, and erroneously determines that the Project will have less than significant impacts in a number of areas.

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E-1 Comment noted.

E-2 Comment noted. The project information presented is correct. It should be noted that in addition to the information provided here by the commenter, the project incorporates a photovoltaic system in order to meet the requirements of the Sustainable Building Expedite Program (50 percent of residential energy consumption generated on-site and 30 percent of commercial energy consumption generated on-site).

E-3 The City acknowledges the comment as an introduction to comments that follow.

E. Shearer-Nguyen
Re: Witt Mission Valley DEIR
January 7, 2018
Page 2

I. The DEIR's Land Use Analysis is Confusing and Incomplete.

A. The DEIR does not clearly explain Project compatibility with existing zoning.

The Project site is designated Commercial Retail in the Mission Valley Community Plan and is zoned MV-CR (Mission Valley – Commercial Retail). (DEIR, p. 2-5.) The DEIR states that the Project “would be developed under the ‘Multiple Use Option’ allowed in the community plan,” which “permits **greater flexibility** in project design **than is possible through strict application of conventional zoning regulations.**” (*Ibid.* [emphasis added].) This suggests that the Project does not comply with the MV-CR zoning designation. (See *ibid.*, *id.* at pp. 3-4 – 3-5.) The DEIR, however, does not explicitly state whether the Project complies with the MV-CR zone designation. (See *ibid.*; *id.* at pp. 5.1-18 – 5-1.66.) This is confusing.

In addition, the DEIR's Land Use Analysis does not discuss exactly what the MV-CR zoning designation permits. (See DEIR, pp. 5.1-1, 5.1-18 – 5-1.66.) San Diego Municipal Code (“S.D.M.C.”) section 1514.0305(b)(2) typically prohibits residential uses in the MV-CR zone. It provides: “residential uses shall not be permitted in commercial zones [including MV-CR] unless the multiple use option in Section 1514.0307(c) is utilized.” (S.D.M.C. § 1514.0305(b)(2).) But the DEIR does not provide this information. (See DEIR, pp. 5.1-1, 5.1-18 – 5-1.66.) Nor does the City clearly examine when the Multiple Use Option, described in S.D.M.C. section 1514.0370(c), permits residential uses in the MV-CR zone, what criteria proposed development must meet in order to qualify for the Multiple Use Option, or whether the Project meets such criteria. (*Ibid.*) In the DEIR's discussion of the City of San Diego's Threshold of Significance 2, which examines whether the Project would “conflict with an adopted land use designation,” the DEIR does not address or discuss the fact that the current zoning typically does not permit residential uses, and whether the Project qualifies for the Multiple Use Option under S.D.M.C. section 1514.0307(c). (*Id.* at pp. 5.1-20 – 5-1.22.) The City was required to disclose this information to provide an adequate description of baseline conditions and Project impacts.

Please update the Land Use analysis to discuss the specific zoning and General Plan requirements for the Project site, explain whether the Project complies with these requirements, and examine in depth whether the Project meets the Multiple Use Option criteria, so that Southwest Carpenters can better understand how the Project will impact land uses in Mission Valley.

B. The City's conclusion that the Project complies with the San Diego General Plan is not supported by the evidence.

The DEIR concludes that the Project is consistent with the San Diego General Plan (“General Plan”). (DEIR, p. 5.1-18.) Yet many of the DEIR's conclusions that the Project

E-4 The commenter correctly quotes the purpose of the Multiple Use Development Option but incorrectly construes its meaning. In order to adequately understand the purpose and goal of the Multiple Use Development Option, the context of the Mission Valley Community Plan must be understood. Throughout the Mission Valley Community Plan is the promotion of multiple use developments that “offer environments for living, working, shopping, and related activities” (Mission Valley Community Plan, p. 16). In fact, the first objective of the Mission Valley Community Plan is to “[e]ncourage high quality urban development in the Valley which will provide a healthy environment and offer occupational and residential opportunities for all citizens” (*Ibid.*, p. 17). When drafting the community plan, eight concepts were established that offered a comprehensive variety for the future vision of Mission Valley, and illustrated feasible approaches to community planning options in Mission Valley in terms of land use classification and development intensity. Three development concepts (or alternatives) included the Multiple Use Development Option, including a recommended alternative Concept 5: Moderate Development – Integrated Use Emphasis, which includes “an emphasis on an integration of commercial-retail, commercial-recreation, office, and residential uses” and “encouragement of residential development in order to complement the commercial and office development presently occurring in Mission Valley” (*Ibid.*, p. 26). Concept 5 became the recommended approach that became the Mission Valley Community Plan.

The Multiple Use Development Option allowed by the Mission Valley Community Plan is intended to provide “*greater flexibility* in project design *than is possible through strict application of conventional zoning regulations*” (emphasis from commenter). The Multiple Use Development Option “permits developers to combine land uses in such a way that community and individual project ‘self-containment’ can be achieved” (*Ibid.*, p. 25). Self-containment “means that all support facilities and services associated with a project are located either within the project or within a short walking distance” (*Ibid.*). Multiple Use Development Option projects are characterized by the following:

- *Two or more significant revenue-producing uses (such as retail, office, residential (either as rentals or condominiums), hotel/motel, and/or recreation – which, in well-planned projects, are financially supportive of the other uses.* The project includes residential and commercial uses, which include retail and office.
- *Significant functional and physical integration of project components*

LETTERS OF COMMENTS AND RESPONSES

	<p><i>including uninterrupted pedestrian connections, if available, to adjacent developments.</i> The project components and physically and functionally integrated internally and relate to the surrounding land uses. Uninterrupted pedestrian connection is provided to the mixed-use project to the east via a shared internal street parallel to Camino de la Reina.</p> <ul style="list-style-type: none"> • <i>Development in conformance with a coherent plan (which frequently stipulates the type and scale of uses, permitted densities and related items).</i> Development would be in conformance with the related Planned Development Permit and Site Development Permit, which include stipulates about type and scale of uses, project density, and site planning/architectural elements. • <i>Public transit opportunities and commitments.</i> The project site is located within walking distance of adjacent bus stops and nearby trolley stops/transit stations. <p>As stated in the Mission Valley Community Plan (p. 60), multiple use is an option for developers that may be applied for through a PDP Permit (which the project proposes) or through a Specific Plan (which would be inappropriate for the project, given its small size and immediate development timeline). An application for a multi-use project should include:</p> <ul style="list-style-type: none"> • <i>Location, scale, size, and proposed use of all buildings.</i> The project permits and EIR disclose the location, scale, size, and proposed use of all buildings. • <i>A schematic plan of pedestrian areas (plazas, courtyards, etc.) and interconnecting usable paths.</i> The development plan set includes access plans and treatments for pedestrian areas, including the grand stairs in the northwest corner and the project's courtyards. • <i>Vehicular access plan including streets, parking, goods delivery, and linkages to the public circulation system (freeways and major surface streets).</i> The development plan set includes project access exhibits and the Focused Transportation Study analyzes the surrounding circulation network. • <i>A landscaping plan to tie the various uses together.</i> The landscaping plan not only visually integrates project components, but also includes
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LETTERS OF COMMENTS AND RESPONSES

	<p>a street tree theme and planting palette that is compatible with the neighboring development to the east.</p> <ul style="list-style-type: none"> • <i>A financing and maintenance plan for any and all public facilities and improvements.</i> The project would pay its Development Impact Fees. • <i>Linkages to the public transit system.</i> The project has existing bus stops immediately adjacent and is walking distance to trolley stops/transit center. • <i>Other land use controls that may be required to conform with the urban design guidelines included in the Urban Design Element of [the Mission Valley Community Plan].</i> The project was presented to the Mission Valley Planning Group's Design Advisory Board (DAB), which evaluates project design against the Mission Valley Community Plan and in light of modern architectural practices and design concepts. The DAB recommended the project for approval by the Mission Valley Community Plan. <p>The multiple use option is intended to encourage comprehensive development "which will minimize the need for an over reliance on automobile access and emphasize pedestrian orientation and proximity to transit" (Ibid, p. 60), which the project achieves. The Community Plan includes an objective and proposals for multiple use projects (Ibid, p. 61), all of which the project meets. As such, the project is consistent with the zone as it implements the Multiple Use Development Option, which is allowed in the Mission Valley Community Plan, regardless of underlying zone, and meets the criteria for the Multiple Use Development Option. Therefore, the project is consistent with the MV-CR zone, as the Multiple Use Development Option of the Community Plan is available, regardless of zone. See also Response No. E-5, below.</p> <p>E-5 The commenter references various elements of the Mission Valley PDO, including Section 1514.0305(b)(2) ("Residential uses shall not be permitted in commercial zones unless the multiple use option in Section 1514.0307(c) is utilized.) and Section 1514.0307(c), Multiple Use Zone Permitted Uses. Applicants have two ways in which they may develop mixed use project is non-mixed use zones within Mission Valley: the Multiple Use Development Option of the Mission Valley Community, explained in detail above in Response No. E-4, and permitted multiple use option within the MV-M zone and commercially-zoned sites. Although the project utilizes the Community Plan Multiple Use Development Option and not the PDO permitted multiple</p>
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LETTERS OF COMMENTS AND RESPONSES

	<p>use option, the referenced text from the commenter underlays the appropriate use of multiple uses within the commercial zone. As referenced by the commenter, Section 1514.0307(c) allows for residential uses within the commercial zones as long as a project includes one or two of the following commercial uses: commercial-visitor, commercial-office, and/or commercial-retail, and one or two residential uses. The project incorporates residential use with commercial-office and commercial-retail uses, which is consistent with the PDO and permitted in the MV-CR zone.</p> <p>As listed in the draft EIR, a Planned Development Permit (PDP) would be required for the proposed development in order to implement the Multiple Use Development Option in the Mission Valley Community Plan. The PDP would also allow for a deviation from development regulations pertaining to sidewalk widths and parkway widths on Camino de la Reina. Section 5.1, Land Use, of the draft EIR lists the requested deviation.</p> <p>The project is consistent with the Mission Valley Community and all zoning regulations applied to the project site through the SDMD, with the exception lot coverage and sidewalk widths. The project is requesting a deviation for sidewalk widths and parkway widths on Camino de la Reina, which would not result in significant land use impacts. Therefore, land use impacts were determined to be less than significant.</p> <p>E-6 The Land Use section does not require revisions as the analysis addresses zoning and land use requirements for the site, and how the project is consistent with these requirements. See Response No. E-4 related to project compliance with the Multiple Use Development Option criteria.</p> <p>Section 5.2.2. of the Draft EIR includes the relevant General Plan goals and policies for the project site, and Table 5.1-2, <i>General Plan Consistency Analysis</i>, addresses project consistency with each applicable goal and policy. The project was determined to be consistent with all applicable General Plan goals and policies; therefore, impacts were determined to be less than significant.</p> <p>E-7 The project is consistent with and assists in fulfilling General Plan Policy LU-H.1. General Plan Policy LU-H.1 applies on a community-wide basis and specifically states:</p> <p><i>LU-H.1. Promote development of balanced communities that take into account community-wide involvement, participation, and needs.</i></p>
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LETTERS OF COMMENTS AND RESPONSES

	<p><i>a. Plan village development with the involvement of a broad range of neighborhood, business, and recognized community planning groups and consideration of the needs of individual neighborhoods, available resources, and willing partners.</i></p> <p><i>b. Invest strategically in public infrastructure and offer development incentives that are consistent with the neighborhood's vision.</i></p> <p><i>c. Recognize the important role that schools play in neighborhood life and look for opportunities to form closer partnerships among local schools, residents, neighborhood groups, and the City with the goal of improving public education.</i></p> <p><i>d. Ensure that neighborhood development and redevelopment addresses the needs of older people, particularly those disadvantaged by age, disability, or poverty.</i></p> <p><i>e. Provide affordable housing opportunities within the community to help offset the displacement of the existing population.</i></p> <p><i>f. Provide a full range of senior housing from active adult to convalescent care in an environment conducive to the specific needs of the senior population.</i></p> <p>The project has undergone substantial public involvement, participating in numerous meetings with the Mission Valley Planning Group, the Mission Valley Planning Design Advisory Board, homeowner associations and owners of neighboring commercial developments, and the San Diego River Park Foundation. All have voiced support for the project. The Mission Valley Planning Group in particular is supportive of the City's goals for the Mission Valley community to move toward a more mixed use, balanced, and multimodal community; and the project meets those goals. The project would meet all requirements of the Americans with Disabilities Act. In addition, onsite elevators and shuttles are amenities that make the project's residential component more desirable for the elderly. The project contributes an element of village development by providing residential and commercial uses, further supporting the developing mixed use neighborhood along Camino de la Reina. The project participates in public infrastructure improvements through construction of sidewalk features that are consistent with and add to what is required by the Community Plan and Planned District Ordinance for this portion of Mission Valley. The range of unit types provided by the project, together with the on-site amenities, the project's location within walking distance to services and amenities, and the provision of an on-site shuttle service, will be attractive to adults at all age levels – including seniors. Additionally, the project would be required to comply with Land Development Code § 142.1304, Inclusionary Affordable Housing Fee, which requires all development projects, with the exception</p>
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LETTERS OF COMMENTS AND RESPONSES

	<p>of condominium conversion developments, to pay an inclusionary affordable housing fee on or before the issuance of the first residential building permit as a condition of the permit. As further identified in Section 4.1 of the Draft EIR, land use impacts were determined to be less than significant.</p>
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LETTERS OF COMMENTS AND RESPONSES

E. Shearer-Nguyen
Re: Witt Mission Valley DEIR
January 7, 2018

Page 3

E-7
(cont.)

complies with specific General Plan policies are not supported by the evidence. (See generally *id.* at § 5.) For example, the DEIR concludes that the Project is consistent with Policy LU-H.1-d, which provides that development should “[e]nsure that neighborhood development... addresses the needs of older people, particularly those disadvantaged by age, disability, or poverty.” (*Id.* at p. 5.1-27.) The DEIR states that the Project is consistent with this policy because it provides “a range of affordability” in housing. (*Ibid.*) But the DEIR does not provide specific prices for residential units to be offered in the Project, nor does the DEIR provide evidence that the Project will be required to provide affordable or low-income housing. (See generally *id.*) How does the City intend to ensure General Plan compliance, such that residential uses are, in fact, affordable for older San Diego residents from a variety of socio-economic backgrounds?

E-8

The DEIR states that the Project is consistent with Policy LU.A.7.b, which aims to “achieve transit-supportive density and design... served by public facilities and services.” (DEIR, p. 5.1-27.) The DEIR states the Project would comply with this policy because it is within walking distance of light rail and bus stops at the Fashion Valley Transit Center. (*Ibid.*) Yet, the DEIR omits the fact that these amenities are a .7 mile, approximately a 15-minute walk from the Project. (See *ibid.*) Nor does it discuss how this might impact the likelihood that residents, employees, and shoppers would utilize such transit options, or how this might undermine the likelihood that the Project support public transit use. (*Ibid.*) How would the Project support and encourage the use of public transit, when the transit center is an almost 15-minute walk from the Project?

E-9

The DEIR states that the Project is consistent with General Plan’s Noise Element Policy NE-A.3, which seeks to “limit future residential and other noise sensitive land uses in areas exposed to high levels of noise.” (DEIR, pp. 5.1-10, 5.1-42.) But the Project will add residential units and office space to an area situated next to the I-8 freeway, as well as close to SR-163 and several large roadways that produce a significant amount of noise, and residential units would be “wrapped” around a five-story parking structure. (See *id.* at pp. 1-1, ES-3.) This will presumably result in vehicle noise on all sides of the Project’s residential units, and will result in significant noise around the Project’s proposed office spaces. The DEIR does not address how the addition of residential and commercial units in a high noise area comports with NE-A.1’s goal of “limit[ing]... residential and other noise sensitive land uses” in areas with “high levels of noise.” (*Id.* at p. 5.1-42.) Likewise, the DEIR states that the Project is “[c]onsistent” with the General Plan goal of “minimal excessive motor vehicle traffic noise on residential and other noise-sensitive land uses” and Policy NE-B.1, which “[e]ncourage[s] noise-compatible land uses... adjoining existing... highways and freeways.” (*Id.* at p. 5.1-43.) Yet it does not explain how noise-sensitive residential or office uses are compatible with the noise produced by I-8, SR-164, or other busy thoroughfares. (See *ibid.*)

E-8

The project would be consistent with General Plan Policy LU-A.7b, as a bus stop is located on the northern boundary of the project site, along Camino de la Reina and is no more than 650 feet from the project site, a 0.12-mile walking distance. Bus Route 6 provides access between North Park and Fashion Valley Transit Center. From the Fashion Valley Transit Center, riders can connect to other bus and trolley routes providing access to other locations. Additionally, the project would provide a private shuttle. The nine-passenger shuttle, including driver, would transport residents and employees of the project to the nearest transit stations at Fashion Valley and Mission Valley Malls, with concurrent access to the retail, entertainment, and employment amenities at these locations. This shuttle would travel on a regular schedule and the service will be provided to residents and employees free of charge.

Traditionally, a one-quarter mile radius has been utilized to determine a five-minute walk. In areas with improvements in connectivity and pedestrian-oriented design, amenities within a 15-minute or 20-minute walking radius (up to one mile) is considered walkable when flat topography is present. If patrons prefer not to walk (or bicycle) to Fashion Valley Transit Center (either along area sidewalks or via the San Diego River Trail), the free shuttle (described above, in the project’s TDM plan, and on page 5.2-18 of the EIR) provided by the project would likely increase likelihood of residents, shoppers, and employees using transit. In addition, Bus Route 6 provides a direct connection to the Fashion Valley Transit Station and has stops directly adjacent to the project location.

In conclusion, the project encourages transit use through its TDM, described in Response No. F-3 and supports the use of public transit by its located with a bus stop located along the northern project boundary; walkable access the numerous other bus stops, trolley stops, and a transit center; and through the provision of a free shuttle.

E-9

General Plan Policy NE-A.3 is to “[l]imit future residential and other noise-sensitive land uses in areas exposed to high levels of noise”. This General Plan policy does not preclude or prohibit the locating of future residential and other noise-sensitive land uses in areas exposed to high noise levels, but rather guides development to limit such exposure.

As concluded in Section 5.1.3, relative to the commercial components of the project, the existing noise level at the north boundary is 66 dBA CNEL and at the northwest corner is 69 dBA CNEL. As shown in Table 5.1-1, noise levels up to 70 dBA CNEL are Conditionally Compatible. Buildings would

LETTERS OF COMMENTS AND RESPONSES

	<p>attenuate interior noise levels to 50 dBA CNEL, as required by the City of San Diego General Plan. Furthermore, the project's commercial uses are located along the northern portion of the site, buffered from freeway noise by the residential building of the project and distance.</p> <p>Relative to residential land uses, as shown in Table 5.7-4, <i>Existing Noise Levels</i>, existing/ambient measurements indicate that existing noise levels range from 64.8 dBA CNEL at the north property boundary to 70.1 dBA CNEL and 76.2 dBA CNEL at the south property boundary, first floor and upper floors, respectively. The existing noise levels at the south boundary exceed the General Plan's Conditionally Compatible limit of 70 dBA CNEL, as shown in Table 5.1-1, <i>City of San Diego Noise Compatibility Guidelines</i>. However, the Noise Element of the General Plan provides that, although not considered compatible, the City conditionally allows future multiple unit and mixed-use residential uses in areas above 70 dBA CNEL, where affected primarily by motor vehicle traffic noise, provided that these uses include building design noise attenuation measures to ensure an interior noise level of 45 dBA CNEL. These uses must be located in an area where a community plan allows for multiple unit and mixed-use residential uses. Because the Mission Valley Community Plan allows for the multiple use option on the project site, the project site meets this requirement.</p> <p>Relative to Policy NE-A.1, as identified in the draft EIR, the project would result in interior noise levels in excess of the City's Noise Compatibility Guidelines requirements. As a condition of project approval, an exterior to interior noise analysis would be required during building permit issuance to ensure that appropriate attenuation measures are implemented to achieve a 45 dBA CENL interior noise level. The interior noise analysis would identify sound transmission loss requirements for building elements exposed to exterior noise levels exceeding 60 dBA CNEL. If the interior 45 dBA CNEL limit can be achieved only with the windows closed, the residence design would include mechanical ventilation that meets applicable California Building Code (CBC) requirements.</p> <p>Relative to Policy NE-B.1, the project would limit the amount of residential uses along I-8 by locating the parking garage towards the freeway and locating the units towards the interior of the site. Additionally, the project's residential building is oriented in a north-south manner, which locates the narrower building edges along the freeway and the wider elevations to the east and west, thereby further limiting exposure of residents and employees to high noise levels.</p>
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LETTERS OF COMMENTS AND RESPONSES

	<p>Finally, CEQA requires analysis of project effects on the environment, not the environment's effects on a project. Rather, this attenuation is required by the General Plan. All residential and commercial units, including those adjacent to the freeway, would meet the General Plan interior noise requirements. Overall, the project was found to be consistent with the Noise Element of the General Plan; impacts were determined to be less than significant.</p>
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	<p>E. Shearer-Nguyen Re: Witt Mission Valley DEIR January 7, 2018 Page 4</p> <p>E-10 Please further explain how the construction of residential and office uses near the loud traffic of a major interstate and large roadway is compatible with Policies NE-A.3 and NE-B.1.</p> <p>C. The DEIR's analysis of Project compatibility with the General Plan Noise Element is misleading.</p> <p>E-11 In discussing the noise levels at the Project site, the DEIR states that levels of 70.1 and 76.2 dBA CNEL at the Project site exceed the "General Plan Conditionally Compatible limit of 70 dBA CNEL, as shown in table with 5.1-1." (DEIR, p. 5.1-23.) But Table 5.1-1 shows that only up to 45 dBA CNEL is compatible for residential areas. (<i>Id.</i> at p. 5.1-9.) Thus, the City's analysis of the noise levels and the Project site erroneously states these noise levels are closer to compatible thresholds than they actually are. (Compare <i>id.</i> at p. 5.1-23 [showing the noise levels at 70.1 and 76.2 dBA CNEL] with p. 5.1-9 [providing that up to 45 dBA CNEL is compatible for residential areas].) Additionally, the DEIR does not define "General Plan Conditionally Compatible limit," or reference where this limit may be found in the General Plan. Omission of this information does not serve the informational purposes of CEQA.</p> <p>E-12 Please update this analysis to reflect the thresholds for residential uses and explain what the DEIR means by "General Plan Conditionally Compatible limit." If the DEIR continues to use the 70 dBA CNEL limit, please explain why it is appropriate to apply this threshold to the Project, which proposes highly noise-sensitive uses.</p> <p>E-13 II. The DEIR's Air Quality Analysis is Unclear.</p> <p>E-14 "[A]n EIR is 'an informational document' aimed at providing 'detailed information about the effect which a proposed project is likely to have on the environment....'" (<i>Laurel Heights Improvement Assn. v. Regents of University of California</i> (1988) 47 Cal.3d 376, 391 ["<i>Laurel Heights</i>"], citing Pub. Resources Code § 21061 and Cal. Code Regs., tit. 14, § 15003(b)-(e).) An EIR that is unclear or omits key information fails to adequately inform the public about a potential project's impact on the environment.</p> <p>E-15 The Project DEIR segregates air quality impacts for Project operations and project construction. This makes it difficult to assess the air quality impacts from the Project as a whole. (DEIR, pp. 5.4-11 – 5.4-13.) Please add information regarding the Project's estimated total emissions, so that Southwest Carpenters can holistically assess the Project's emissions impacts.</p> <p>The DEIR also discusses general air quality thresholds, which do not include project specific quantitative thresholds in depth. (DEIR, pp. 5.4-3 – 5.4-8 [discussing general federal and state emissions requirements].) However, it fails to clearly describe or explain the City of San</p>	<p>E-10 See Response No. E-9. 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 an excessive noise environment. More specifically, the Land Use - Noise Compatibility Guidelines shown on Table NE-3 establishes noise land use compatibility guidelines, when reviewing proposed land use development projects. General Plan Policy NE-B.1 states: "Encourage noise-compatible land uses and site planning adjoining existing and future highways and freeways." As discussed in Section 4.0, the project was revised to locate the parking garage, a noise-compatible land use, adjacent to the freeway. The project is consistent with this policy.</p> <p>E-11 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 an excessive noise environment. More specifically, the Land Use - Noise Compatibility Guidelines shown on Table NE-3 establishes noise land use compatibility guidelines, when reviewing proposed land use development projects. A "compatible" land use indicates that standard construction methods will attenuate exterior noise to an acceptable indoor noise level and people can carry out outdoor activities with minimal noise interference.</p> <p>For land uses indicated as "conditionally compatible," structures must be capable of attenuating exterior noise to the indoor noise level as shown on Table NE-3 of the General Plan. For land uses indicated as "incompatible," new construction should generally not be undertaken. As stated in the General Plan, although not generally considered compatible, the City conditionally allows multiple unit and mixed-use residential uses up to 75 dBA CNEL in areas affected primarily by motor vehicle traffic noise. Any future residential use above the 70 dBA CNEL must include noise attenuation measures to ensure an interior noise level of 45 dBA CNEL and be located in an area where a community plan allows multiple unit and mixed-use residential uses.</p> <p>E-12 Please see response no. E-11. There is no need to update the analysis in the EIR or the technical report. The EIR and Noise Study respond to the General Plan Noise Element's goals and policies that guide compatible land uses and require the incorporation of noise attenuation measures for new uses to protect people living and working in the City from an excessive noise environment. The Land Use - Noise Compatibility Guidelines shown on Table NE-3 establishes noise land use compatibility guidelines, when reviewing proposed land use development projects. The Draft EIR identified</p>
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LETTERS OF COMMENTS AND RESPONSES

	<p>Table NE-3, Land Use – Noise Compatibility Guidelines as the thresholds for residential uses, which lists Residential – Multiple Dwelling Units category as conditionally compatible up to 70 dBA CNEL. The Noise Study was prepared for the project consistent with General Plan Policy NE-A.4, which requires that an acoustical study be prepared “consistent with Acoustical Study Guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the “compatible” noise level thresholds as indicated on the Land Use - Noise Compatibility Guidelines (Table NE-3), so that noise mitigation measures can be included in the project design to meet the noise guidelines”.</p>
	<p>E-13 Comment noted.</p>
	<p>E-14 The air quality analysis correctly segregates construction and operational air quality impacts, as construction and operation are two distinct and separate phases and would not occur at the same time. Estimating total emissions would be inappropriate as this project is not being constructed in phases.</p>
	<p>E-15 The San Diego Air Pollution Control District has established thresholds in Rule 20.2 for new or modified stationary sources (SDAPCD, 2015), with the exception of Volatile Organic Compounds (VOCs) and PM_{2.5} thresholds. The City’s <i>CEQA Significance Determination Thresholds</i>, Table A-2, (City of San Diego, 2016) incorporate screening level thresholds established by the San Diego Air Pollution Control District (APCD) pollutant thresholds, under Rule 20.2; because the APCD does not identify thresholds for Volatile Organic Compounds (VOCs) and PM_{2.5}, the City’s CEQA Significance Determination Thresholds rely on the more restrictive National and State Ambient Air Quality Standards when a project involves sensitive receptors. The City does not show a standard for PM_{2.5} but does include a threshold for Reactive Organic Gas/Volatile Organic Compounds (ROG/VOC) emissions. Collectively, the standards shown in Table A-2 of the City’s 2016 CEQA Determination Thresholds and the PM_{2.5} threshold shown in Table 20.2-1 of SDAPCD Rule 20.2 are used to determine whether project emissions would cause a significant air quality impact. Project emissions in excess of these thresholds could cause or contribute to a significant impact. Emissions less than the thresholds would have a less than significant impact. These thresholds are provided in Table 5.4-1, <i>Ambient Background Concentrations</i>. Sufficient information regarding the source material for the thresholds is provided in Section 5.4.1 (source material: Table 5.4.1; thresholds: Table 5.4.2 and 5.4.3) and Section 5.4.2 (thresholds included</p>

LETTERS OF COMMENTS AND RESPONSES

within each issue area) of the Draft EIR. Because the Draft EIR provided these thresholds, recirculation is not required.

<p>E-15 (cont.)</p> <p>E-16</p> <p>E-17</p> <p>E-18</p>	<p>E. Shearer-Nguyen Re: Witt Mission Valley DEIR January 7, 2018 Page 5</p> <p>Diego's California Environmental Quality Act Significance Determination Thresholds ("CEQA Significance Determination Thresholds"), which are the only objective criteria applied by the City in the DEIR to determine whether the Project's emissions would result in significant impacts. (<i>Id.</i> at 5.4-9 [very briefly discussing San Diego's quantitative emissions thresholds].)</p> <p>Please update and recirculate the DEIR with information regarding how the CEQA Significance Determination Thresholds were calculated and how they ensure that the Project's air quality impacts are less than significant. (See <i>ibid.</i>)</p> <p>It is difficult to assess whether the Project actually complies with Issue 1 of the CEQA Significance Determination Thresholds. Issue 1 asks whether "the proposal would conflict with or obstruct implementation of the applicable air quality plan." (DEIR, p. 5.4-10.) The City asserts that the Project would not conflict with an applicable plan and would not result in a significant impact. (<i>Ibid.</i>) The City reasons that the Project "would develop under the existing zone and land use designation," and is "consistent with the City's General Plan," so it would be consistent with the San Diego Regional Air Quality Strategy ("RAQS"). (<i>Ibid.</i>; <i>id.</i> at p. 2-7 [defining RAQS].) As discussed <i>supra</i>, the Project does not comply with applicable zoning designations, which prohibit development of the Project site for residential use. Further, the City does not disclose whether air quality plans promulgated the Air Pollution Control District have ever planned for higher-intensity residential uses at the Project site. If the Project conflicts with the assumptions set forth in regional air quality plans, the Project is inconsistent with these plans. However, without more information, Southwest Carpenters, cannot determine whether the Project's emissions would result in significant impacts under Threshold 1.</p> <p>Please update the DEIR's land use analysis and the Air Quality impacts analysis to more adequately evaluate the consistency of the Project with zoning and General Plan requirements, as well as the assumptions underpinning the Air Pollution Control District's plans designed to implement the San Diego Regional Air Quality Standards.</p> <p>III. The DEIR's Greenhouse Gas ("GHG") Emissions Analysis Is Insufficient.</p> <p>A. The GHG analysis is incomplete and uninformative.</p> <p>The Legislature and California Supreme Court have indicated that "an EIR is 'an informational document' ... and that '[t]he purpose of an environmental impact report is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment....'" (<i>Laurel Heights, supra</i>, 47 Cal.3d at 391, citing Pub. Resources Code § 21061 and Cal. Code Regs., tit. 14, § 15003(b)-(e).) Yet the DEIR fails to provide the public with adequate information about the Project's potential impacts to greenhouse gas emissions ("GHGs").</p>	<p>E-16 See Response Nos. E-4 and E-5 above. As previously identified, the multiple use option is intended to encourage comprehensive development "which will minimize the need for an over reliance on automobile access and emphasize pedestrian orientation and proximity to transit" which the project achieves. The Community Plan includes an objective and proposals for multiple use projects, all of which the project meets. As such, the project is consistent with the zone as it implements the Multiple Use Development Option, which is allowed in the Mission Valley Community Plan, regardless of underlying zone, and meets the criteria for the Multiple Use Development Option. Therefore, the project is consistent with the MV-CR zone, as the Multiple Use Development Option of the Community Plan is available, regardless of zone.</p> <p>Further, SDMC Section 1514.0307(c) of the Municipal Code allows for residential uses within commercial zones as long as a project includes one or two of the following commercial uses: commercial-visitor, commercial-office, and/or commercial-retail, and one or two residential uses. SDMC Section 1514.0307(b) states that, in commercial zones (such as the MV-CR zone applied to the project site) the predominant land use shall be consistent with the Community Plan land use designation. As stated above, the project is consistent with the Community Plan Multiple Use Development Option and is therefore consistent with the land use designation. The project incorporates residential use with commercial-office and commercial-retail uses, which is consistent with the PDO and the Mission Valley Community Plan and permitted in the MV-CR zone. The project is consistent with the zoning and General Plan designations provided it is developed consistent with the multiple use option discussed above.</p> <p>As discussed in the draft EIR, the project proposes a mix of residential, commercial, and shopkeepers units and complies with the Mission Valley Community Plan, which allows for a Multi-Use Option as summarized above. The project would develop under the existing zone and land use designations; therefore, a Rezone and Community Plan Amendment would not be required. Accordingly, the project would be consistent with the City's General Plan and, therefore, consistent with the Air Quality Management Plan (AQMP), Regional Air Quality Strategy (RAQS) and State Implementation Plan (SIP). The project would not conflict with or obstruct implementation of the AQMP, RAQS or SIP, and would not result in a significant impact as concluded in the Draft EIR.</p>
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LETTERS OF COMMENTS AND RESPONSES

	<p>E-17 Refer to Response Nos. E4 and E5 regarding Land Use and E-14 through E-16 regarding Air Quality. The Draft EIR adequately analyzed the project's land use and air quality impacts, which concluded that impacts were less than significant. No additional information or revision is required.</p> <p>E-18 Comment noted.</p>
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LETTERS OF COMMENTS AND RESPONSES

E. Shearer-Nguyen
Re: Witt Mission Valley DEIR
January 7, 2018
Page 6

E-19

The City incorrectly relies on international, statewide, and regional plans which were not designed to be applied at the project-level. (See *Center for Biological Diversity v. Dep't of Fish & Wildlife* (2015) 62 Cal.4th 204; DEIR, pp. 5.5-6 - 5.5-15.) The City provides no analytical connection between these plans and requirements for the Project itself. (See *ibid.*) These plans, for example, discuss GHG emissions requirements for manufacturers of vehicles, emissions requirements for large GHG emissions sources, and requirements for California Air Resources Board rulemaking, but do not provide clear standards for development projects. (*Id.* at pp. 5.5-7 - 5.5-8.) This information is unnecessary and undermines the DEIR's function as a transparent, educational document. Further, the City fails to disclose whether it is on track to meet or exceed the emissions reduction goals set forth in its CAP.

E-20

E-21

It is also unclear whether the City's analysis of the Project's compliance with the San Diego Climate Action Plan Consistency Checklist ("CAP Consistency Checklist") is correct. (See DEIR, p. 5.5-16, Appendix C.) For example, on the CAP Consistency Checklist and in the GHG analysis, the City states that the Project is consistent with existing land use designations. (*Ibid.*, Appendix C, p. 4.) Yet, as discussed *supra*, the DEIR does not explain how the Project is consistent with existing land use requirements. (See *id.* at pp. 5.1-20 - 5.1-22.) Without clarification about whether the Project, in fact, complies with the Project site's land use designation, it is not possible for the public to understand the CAP Consistency Checklist analysis nor determine whether this analysis is correct. Please update the DEIR's land use analysis, as outlined *supra*, so that Southwest Carpenters can better understand the DEIR's CAP Consistency Checklist analysis.

E-22

B. The DEIR does not make a good-faith effort to provide specific projections for the Project or thresholds for significant GHG emission impacts.

"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 greenhouse gas emissions resulting from a project." (Cal. Code Regs., tit. 14, § 15064.4(a).) The City, however, fails to provide any quantitative estimates of baseline emissions or GHG emissions from Project construction and operation. (See DEIR, pp. 5.5-16 - 5.5-19; see Cal. Code Regs., tit. 14, § 15126 ["all phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation"].) Nor does the City provide any specific, numerical thresholds for GHGs for development projects. (See generally DEIR, § 5.5.) The City's failure to evaluate the Project using a quantitative significance threshold does not constitute a good-faith effort to disclose the GHG impacts of a project of this size. Please update the DEIR to include numerical thresholds and compare those thresholds to the Project's GHG emissions to determine whether the Project will have a significant impact on greenhouse gasses.

E-19 The international, statewide, and regional plans referenced by the commenter are provided as the Regulatory Framework (Section 5.5), which provide the public background to better understand why and how global climate change and greenhouse gas emissions are studied, as well as what regulations are in place to reduce emissions.

E-20 A project-level EIR is not the appropriate place to discuss whether the City is on track to meet or exceed the emissions reduction goals set forth in the CAP, as that is a Citywide goal and is separately monitored within the City. City attainment toward its emissions reduction goals is the purview of future updates to the City's CAP.

E-21 Refer to Response Nos. E-4 through E-6. As disclosed in the Draft EIR, the project would be consistent with the underlying General Plan, community plan, and zone designations, as it would implement the Multiple Use Development Option allowed in the Mission Valley Community Plan. As such, the project was found to be consistent with the General Plan, community plan, and zone designations under Step 1: Land Use Consistency, and no further analysis was warranted.

As the project would be consistent with the land use and zoning designations of the site. The project would not conflict with the CAP or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases. 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.

Furthermore, the Land Use Section does not require additional clarification.

E-22 In December 2015, the City adopted the CAP which outlines the actions that the City will undertake to achieve its proportional share of State GHG emission reductions. In accordance with CEQA Guidelines section 15183.5(b)(1)(A-F), the CAP was intended to serve as a qualified GHG reduction plan for purposes of tiering under CEQA in that it:

1. Quantified GHG emissions, both existing and projected over a specified period of time, resulting from activities in a defined geographic area;
2. Established a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable;

LETTERS OF COMMENTS AND RESPONSES

	<ol style="list-style-type: none"> 3. Identified and analyzed GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area; 4. Specified measures of a group of measures, including performance standards, that would collectively achieve the specified emissions levels; 5. Established a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and 6. Was adopted in a public process following environmental review. <p>The CAP included a group of strategies and actions, including performance targets, that substantial evidence demonstrated would collectively achieve the specified emissions levels on a Citywide level. However, at the time the CAP was adopted, it did not specify measures to be implemented on a project-by-project basis to ensure that the CAP targets would be achieved as required in CEQA Guidelines Section 15183.5(b)(1)(D). Therefore, pursuant to CEQA Sections 15183.5(b), 15064(h)(3), and 15130(d), the City developed a CAP Consistency Checklist, the City's adopted GHG Emissions significance determination threshold, that would determine that a project's incremental contribution to a cumulative GHG effect would not be cumulatively considerable if a project complies with the requirements of the City's CAP. Projects found to be consistent with the CAP Consistency Checklist are determined to be consistent with the CAP and therefore have a less than significant cumulative impact.</p> <p>As the City has an adopted GHG Emission significance determination threshold, it would not be appropriate to utilize other thresholds as identified in the comment. Furthermore, as identified in Section 5.2, <i>Greenhouse Gas Emissions</i>, of the Draft EIR, the project would result in a less than significant impact. Refer to Response No. E-22</p>
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E. Shearer-Nguyen
Re: Witt Mission Valley DEIR
January 7, 2018
Page 7

C. The DEIR does not provide appropriate mitigation for GHG emissions.

The City fails to provide adequate mitigation to reduce GHG-related impacts. The City's finding that the Project would result in less than significant impacts and its finding that the Project would not require mitigation measures is not supported by evidence in the record. (See DEIR, p. 5.5-19; see Cal. Code Civ. Proc. § 1094.5 [providing that agency findings must be supported by record evidence]; Cal. Pub. Resources Code § 21168 [applying the Section 1094.5 standard to CEQA actions].) The City, therefore, has failed to provide appropriate and enforceable mitigation for the greenhouse gas impacts of the Project. (DEIR, p. 5.5-19; Cal. Code Regs., tit. 14, § 15126.4(a)(1) ["An EIR shall describe feasible measures which could minimize significant adverse impacts, including where relevant, inefficient and unnecessary consumption of energy"]; Cal. Code Regs., tit. 14, § 15126.4(a)(2) ["Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments"].)

Please revisit the GHG analysis, as described, *supra*, and update GHG mitigation measures accordingly.

IV. The DEIR's Conclusion that the Project Will Not Have Significant Health and Safety Impacts is Not Supported by the Evidence.

The DEIR indicates that the Project would have less than significant impacts to health and safety. (DEIR, pp. 5-10.6 – 5-10.14.) This conclusion is not clearly supported by the evidence, and the DEIR does not outline how, based on the factual information included, it reached the conclusion that the Project would cause less than significant impacts. (See *ibid.*)

When conducting an environmental impact analysis, an agency's determinations must be supported by evidence in the record. (Cal. Code Civ. Proc. § 1094.5; Cal. Pub. Resources Code § 21168.) An agency cannot simply draw conclusions without analysis. (See *Topanga Association for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 511–512, 515 ["*Topanga*"].) It "must set forth findings to bridge the analytic gap between the raw evidence and ultimate decision or order." (*Ibid.*)

The DEIR lists several potential contaminants that could have significant health impacts, including three underground storage tanks ("Gasoline USTs") used for gasoline and one underground storage tank used for waste oil (collectively "USTs") located at the Project site. (DEIR, p. 5-10.9.) According to the DEIR, there was no documentation regarding the removal of one of the Gasoline USTs and no final closure letter was issued for a second Gasoline UST. (*Ibid.*) The DEIR states that there is "still the potential for soil contamination in the vicinity of

E-23 As previously identified, the City adopted a CAP Consistency Checklist, the City's adopted GHG emissions significant determination threshold. Projects found to be consistent with the CAP Consistency Checklist are determined to be consistent with the CAP and therefore would have a less than significant cumulative impact.

The project would be consistent, the land use and zoning designations of the site, and therefore consistent with the assumption of the CAP. Furthermore, the project would implement the CAP Consistency Checklist Step 2 Strategies as conditions of approval. Overall, the project would not conflict with the CAP or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases. The project would not result in a significant impact relative to plans, policies, or regulations aimed at reducing GHG emissions. As concluded in the draft EIR, impacts were determined to be less than significant and mitigation measures were not warranted.

E-24 Comment noted. This comment is vague and does not specifically describe how the project would result in significant impacts related to Health and Safety. All project impacts were identified and evaluated in the Draft EIR, consistent with CEQA, and impacts were determined to be below a level of significance, and therefore mitigation was not warranted. The comment does not raise any specific issue regarding the analysis and, therefore, a more specific response is not provided or required.

E-25 Comment noted. This comment provides general guidance regarding CEQA. The comment does not address the adequacy of the EIR or its analysis. No further response is required.

E-26 Comment noted. This comment includes a summary of some of the information provided in Section 5.10, *Health and Safety*, of the Draft EIR. Additional information is provided below from the Phase I and Phase II Environmental Site Assessments (ESAs). Additionally, the project applicant consulted with the County Department of Environmental Health through DEH's Voluntary Assistance Program (VAP). As a result of consulting with DEH and as detailed below, the applicant prepared a Soil Management Plan (SMP) for the project. DEH correspondence and the SMP have been added as Appendix Q, *Soil Management Plan and DEH Correspondence*, to the EIR.

As stated in Section 5.10, a Phase I Environmental Site Assessment (Phase I ESA) was prepared for the project site. As documented in the Draft EIR, records indicated that the site was first developed for commercial purposes around 1970 as an auto dealership and repair shop and has been used in

LETTERS OF COMMENTS AND RESPONSES

	<p>that capacity since that time. Three 2,000-gallon underground storage tanks (USTs) used for storage of regular unleaded gasoline and one 550-gallon tank used for waste oil were formerly located at the property. One of the 2,000-gallon tanks was replaced with a double walled tank in 1986, and contamination of the soil was noted. However, the contaminated soil was properly excavated and disposed in a landfill. The waste oil UST was removed in 1991, and soil contamination was noted in the remote fill area. Records indicated that the contaminated soil from that area was also properly excavated and disposed in a landfill. All three 2,000-gallon USTs were removed sometime during the early 2000s.</p> <p>In addition, the Phase I ESA and Section 5.10 of the EIR documented that the site is currently equipped with approximately 17 above-ground hydraulic lifts. Each location had evidence of surface repair and patching, suggesting these above-ground lifts might be replacements for former subsurface hydraulic lifts. These elements were identified as recognized environmental conditions in the Phase I ESA that justified preliminary subsurface investigation.</p> <p>The Phase I ESA recommended that a Phase II Investigation be conducted to determine whether soil, soil vapor, or groundwater had been contaminated due to past and present use of the property. In October 2017, Hillmann completed a Limited Phase II Subsurface Investigation (Appendix K of the EIR) at the property that further identified a waste water clarifier, two above-ground oil storage tanks, and two paint spray booths side-by-side on the project site. The Phase II featured soil and soil gas sampling to identify potential contamination from petroleum hydrocarbons, lead, PCBs, and volatile organic compounds (VOC). As part of the Phase II Investigation, Hillmann installed 22 soil borings and soil gas sampling probes in targeted locations across the site. These locations were selected as the most likely areas to have subsurface impacts.</p> <p>The results of soil sampling indicated low levels of total petroleum hydrocarbons (TPH) and lead in soil and low levels of toluene in soil gas. However, when compared to stringent residential screening levels set by DTSC and the San Francisco Regional Water Quality Control Board (SFRWCB), both samples came in under the level accepted for residential development. The lead had a high concentration hit of 8.58 mg/Kg, as compared to the acceptable level of 80 mg/Kg. The TPH was 180 mg/KG, as compared to the acceptable level of 230 mg/kg. Finally, the toluene in soil gas had a level of 0.85 ug/L, as compared to the acceptable level of 310</p>
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LETTERS OF COMMENTS AND RESPONSES

	<p>micrograms per liter (ug/L). As such, no further sampling was recommended.</p> <p>The results of the Phase II Investigation suggested no significant subsurface impacts in any of the 22 areas selected. The Phase II noted that, during grading of the site, isolated areas of petroleum compounds may be found and should be separated out from the rest of the soils and properly stored and analyzed for disposal.</p> <p>The project applicant consulted with the County Department of Environmental Health through DEH's Voluntary Assistance Program (VAP). The VAP provides staff consultation, project oversight, and technical or environmental report evaluation on projects pertaining to properties contaminated with hazardous substances. DEH utilizes its experience and knowledge of environmental assessment, cleanup, and risk evaluation to facilitate the rapid and cost-effective resolution of soil and groundwater contamination problems.</p> <p>Although no significant environmental concerns were identified in the subsurface investigation, it is conceivable that hydrocarbon or VOC impacted soil could be encountered during grading and excavation activities. Therefore, the applicant prepared a Soil Management Plan (SMP). (The SMP is available on file at DSD.) Soil management procedures that would be applied during grading and construction include soil monitoring, dust control, erosion control, soil stockpile management, soil disposal, and site access control. Following site development, the soil would be covered by asphalt pavement or grass (in the swale areas). Grass-covered swale areas would be inspected quarterly to visually observe the condition of the grass cover and ensure that large areas of exposed soil (e.g., areas larger than several feet in diameter) are reseeded. Annual inspections of the paved parking areas will be performed to observe whether breaches in the pavement that may allow prolonged access to site soil are visible. If observed, the breach would be repaired such that the soil cover is maintained. As such, no significant impacts relative to soil contamination would result as all potential impacts would be handled and disposed of properly.</p> <p>DEH approved and accepted the SMP and is responsible for ensuring its implementation (February 2, 2018, on file with DSD). The SMP would be a condition of project approval.</p>
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LETTERS OF COMMENTS AND RESPONSES

	<p>As stated in the Phase I ESA and Section 5.10 of the EIR, site development that involves demolition of structures must adhere to regulations in place that ensure adequate treatment and disposal of hazardous materials, as well as appropriate protection of workers to avoid potential health risks. Demolition of the existing buildings and improvements and disposal of any hazardous materials would be conducted in accordance with state and local regulations. The Asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP), as specified under Rule 40, CFR 61, Subpart M, applies to asbestos removal and demolitions and is enforced locally by the San Diego Air Pollution Control District, under authority, per Regulation XI, Subpart M Rules 361.145 and 361.150. No health risks will occur. Prior to demolition, both friable and various nonfriable ACMs, if present, would be removed from the structures per NESHAPS, Title 40 Code of Federal Regulations Part 61. In addition, all applicable laws and regulations would be followed, including provisions requiring notification of tenants, employees, maintenance and custodial personnel, and outside contractors, of the location of these materials, if present.</p>
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LETTERS OF COMMENTS AND RESPONSES

E. Shearer-Nguyen
Re: Witt Mission Valley DEIR
January 7, 2018
Page 8

the tanks.” (*Ibid.*) It also notes that there is “contaminated groundwater” and there are seventeen hydraulic lifts that include “the potential for an undocumented released [sic] and subsequent contamination... from hydraulic fluids and/or polychlorinated biphenyls” at the site. (*Id.* at p. 5-10.10.)

E-27

The DEIR’s Health and Safety “Significance of Impacts” analysis, however, does not mention the USTs, the hydraulic lifts, or the contaminated groundwater at the Project site. (DEIR, p. 5.10-11.) Nor does the DEIR discuss how these items might impact health and safety at the site. (*Id.* at pp. 5-10.9 - 5.10-11.) Notably, information regarding the USTs included in an attached Subsurface Investigation Report conflicts with information regarding USTs in the DEIR. (DEIR, Appendix K, p. C3-6987.) The DEIR indicates that the City does not possess documentation regarding the closure of one UST, but the Subsurface Investigation Report states “[a]ll three of the [Gasoline] USTs were reportedly removed sometime during the early 2000s, although no documentation was provided.” (*Ibid.*)

E-28

In order to fully understand and assess the Project’s impacts to Health and Safety, the DEIR needs to contain additional information regarding these health and safety impacts. Were the USTs removed? If so, when? Does the City have documentation regarding proper removal of the USTs? Have these USTs leaked and leached harmful contaminants into Project soils? What is the likelihood of the release of hydraulic fluids and polychlorinated biphenyls at the Project site? Will Project construction, grading, or operation expose workers or future Project users to contamination from the USTs or potential contamination from hydraulic fluids and polychlorinated biphenyls? If so, what is the likelihood of release of hazardous materials, and what is the likely impact of such a release? How might Project grading, construction, and operation impact contaminated ground water at the Project site? Might Project grading, construction, or operation result in exposure to these contaminants or the release of contaminated groundwater into the nearby San Diego River? (See DEIR, p. ES-3.) Ultimately, how does the City reconcile these potential hazards with its conclusion that the Project would not result in significant health and safety impacts?

E-29

The City cannot in a DEIR rely on a lack of information regarding hazardous conditions to avoid environmental review or require adequate mitigation. Because the City’s finding that the Project will not have significant health and safety impacts is, by the City’s own admission, unsupported by the evidence, the City’s finding that the Project does not require mitigation also lacks evidentiary support. (See DEIR, pp. 5-10.6 – 5-10.14; Cal. Code Civ. Proc. § 1094.5; Cal. Pub. Resources Code § 21168.) The City, therefore, has failed to provide appropriate and enforceable mitigation to address the serious health and safety impacts of the Project. (See Cal. Code Regs., tit. 14, §§ 15126.4(a)(1), 15126.4(a)(2).)

E-27 Additional information is provided in response no. E-26 regarding the Phase I and Phase II ESAs. Additionally, as stated in response no. E-26, the project applicant consulted with the County Department of Environmental Health through DEH’s Voluntary Assistance Program (VAP). As a result of consulting with DEH and as detailed below, the applicant prepared a Soil Management Plan (SMP) for the project. DEH correspondence and the SMP have been added as Appendix Q, *Soil Management Plan and DEH Correspondence*, to the EIR.

The commenter is correct in that the “Significance of Impacts” section under Issue 4 in Section 5.10 of the EIR did not list the RECs and USTs, nor does it reflect the SMP prepared for the project. Therefore, the “Significance of Impacts” has been expanded to include the following:

The project site is the location of former soil contamination, in the form of four identified RECs and one identified HREC (three USTs and the potential for groundwater contamination). These prior contaminations have been resolved and no longer represent a risk to future occupants of the site. The project would be conditioned to implement the SMP to ensure management and disposal of unknown contaminated soil that may be encountered during project grading. Impacts would be less than significant.

As stated in the EIR, A *Limited Phase II Subsurface Investigation Report* was prepared for the project by Hillmann Consulting (November 8, 2017; Appendix K). The Phase II investigation featured soil and soil gas sampling to identify potential contamination from petroleum hydrocarbons, lead, PCBs, and VOCs. Results from the soil sampling indicated two soil samples had detectable levels of petroleum hydrocarbons with a maximum of 180 milligram per kilogram (mg/Kg) diesel range hydrocarbons. The results from the lead analysis indicated some samples had low, background levels of lead with a maximum of 8.58 mg/Kg. No PCBs were detected in the soil. Concentrations of hydrocarbon detected at the site are insignificant for the proposed use. The lead concentrations are below the Department of Toxic Substances (DTSC) Screening Level for residential applications of 80 mg/Kg. Results from the soil gas sampling indicated toluene was detected in four soil gas samples with a maximum of 0.85 microgram per liter (ug/L). No other VOC was detected in any of the soil gas samples. The detected concentrations were compared to the DTSC Future Construction Residential Screening Levels, which are derived from current indoor air quality standards and published default structure attenuation values for future residential construction. Results indicated none of the samples had toluene

LETTERS OF COMMENTS AND RESPONSES

	<p>or PCB concentrations greater than these conservative screening guidelines.</p> <p>The results of the Phase II Investigation suggest no significant subsurface impacts in any of the 22 areas selected for subsurface investigation at the site. However, during grading of the site, there is a possibility that isolated areas would have actionable levels of petroleum compounds due to the historic natures of business activities. If encountered, elevated petroleum concentrations in the underlying solid should be separated out and properly addressed during the grading process. The soil and soil gas sampling found that no significant levels of hydrocarbons, PCBs, or VOCs are present in the soil in the project site. This finding closes out the four RECs and one HREC found by the Phase I investigation.</p> <p>The project applicant consulted with the County Department of Environmental Health through DEH's Voluntary Assistance Program (VAP). The VAP provides staff consultation, project oversight, and technical or environmental report evaluation on projects pertaining to properties contaminated with hazardous substances. DEH utilizes its experience and knowledge of environmental assessment, cleanup, and risk evaluation to facilitate the rapid and cost-effective resolution of soil and groundwater contamination problems.</p> <p>Although no significant environmental concerns were identified in the subsurface investigation, it is conceivable that hydrocarbon or VOC impacted soil could be encountered during grading and excavation activities. Therefore, the applicant prepared a Soil Management Plan (SMP). (See Appendix Q.) Soil management procedures that would be applied during grading and construction include soil monitoring, dust control, erosion control, soil stockpile management, soil disposal, and site access control. Following site development, the soil would be covered by asphalt pavement or grass (in the swale areas). Grass-covered swale areas would be inspected quarterly to visually observe the condition of the grass cover and ensure that large areas of exposed soil (e.g., areas larger than several feet in diameter) are reseeded. Annual inspections of the paved parking areas will be performed to observe whether breaches in the pavement that may allow prolonged access to site soil are visible. If observed, the breach would be repaired such that the soil cover is maintained. As such, no significant impacts relative to soil contamination would result as all potential impacts would be handled and disposed of properly.</p>
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LETTERS OF COMMENTS AND RESPONSES

	<p>DEH approved and accepted the SMP and is responsible for ensuring its implementation. The SMP would be a condition of project approval.</p> <p>E-28 See Response No. E-26 and E-27.</p> <p>E-29 See Response No. E-26 and E-27.</p>
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E. Shearer-Nguyen
Re: Witt Mission Valley DEIR
January 7, 2018
Page 9

V. The DEIR's Cumulative Impacts Analysis is Incomplete.

A. The DEIR does not adequately examine cumulative air quality impacts.

E-30

The City's conclusion that "no cumulative impacts to air quality would occur" is not supported by the evidence. (DEIR, p. 6-6; Cal. Code Civ. Proc. § 1094.5; Cal. Pub. Resources Code § 21168.) Nearby development, in conjunction with the Project, will presumably have significant and unavoidable cumulative air quality impacts. Surrounding projects will include significant construction, and will result in intensive office, retail, hotel, and residential uses that will cumulatively worsen the air basin's ongoing air quality violations and ultimately delay the air basin's timely attainment with air quality standards designed to protect human health and the environment. (*Id.* at pp. 6-11 – 6-14.) These circumstances do not support a conclusion that the Project will not result in any cumulative impact.

The Project is located in the San Diego Air Basin ("SDAB"), which is in nonattainment for the California Ambient Air Quality Standards for ozone ("O₃"), inhalable particulate matter ("PM₁₀"), and fine particulate matter ("PM_{2.5}"), as well as the 8-hour National Ambient Air Quality Standards for O₃. (DEIR, pp. 5.4-1, 5.4-3 – 5.4-5, 6-5.) The DEIR concludes that, because the Project, by itself, would not exceed screening thresholds for pollutants, and because other projects would also have to comply with individual emissions standards, "no cumulative impacts to air quality would occur." (*Id.* at pp. 6-5 – 6-6.)

E-31

In reaching this conclusion, the DEIR fails to comply with its obligations under CEQA. CEQA requires an agency drafting an EIR to conduct "[a] reasonable analysis of the cumulative impacts of the relevant projects." (Cal. Code Regs., tit. 14, § 15130(b)(5).) An agency must "examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects" in an EIR, (*ibid.*), and "must use its best efforts to find out and disclose all that it reasonably can" (*San Franciscans for Reasonable Growth v. City & County of San Francisco* (1984) 151 Cal.App.3d 61, 74 ["*San Franciscans*"]).

The DEIR does not "use its best efforts to find out and disclose all it reasonably can." (*San Franciscans, supra*, 151 Cal.App.3d at 74.) The DEIR does not analyze, let alone mention, any of the 15 projects on the Mission Valley Cumulative Projects List included in the DEIR, let alone other projects the greater San Diego Air Basin region, nor the projected or actual air quality impacts of each project. (DEIR, pp. 6-5 – 6-6.) Furthermore, the City's analysis is logically and practically flawed, because it falsely assumes that no other project in the SDAB has been, or will be, found to have significant and unavoidable air quality impacts. (*Ibid.*) Did the City analyze the actual impacts of surrounding projects or provide estimates of project emissions

E-30 Section 15355 of the State CEQA Guidelines describes "cumulative impacts" as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. These individual effects may be changes resulting from a single project or a number of separate projects.

In general, the SDAB is used as the study area for evaluating cumulative air quality impacts. This analysis, therefore, relies on the RAQS, which have been developed for the SDAB. For the purposes of evaluating localized air quality impacts associated with CO hotspots, this analysis considers cumulative projects that would contribute to congested intersections that would be affected by project traffic.

Air quality impacts would be considered cumulatively considerable if: (1) a project's contribution of air emissions would exceed the NAAQS or CAAQS thresholds for a criteria pollutant that the air basin is in nonattainment for; (2) emissions from project traffic combined with other traffic emissions would create a CO hotspot; or (3) project construction emissions combined with construction emissions from other projects would exceed NAAQS or CAAQS thresholds for criteria pollutants.

The SDAB is considered a moderate nonattainment area for the 8-hour NAAQS for O₃, and a nonattainment area for the CAAQS for O₃, PM₁₀, and PM_{2.5}. According to Section 5.4, Air Quality, of the draft EIR, the project would not conflict with implementation of the RAQS. Furthermore, as discussed in Section 5.4.3 regarding criteria pollutant emissions, the project's operational regional emissions would not exceed the City's Screening Level Thresholds and would not contribute to existing violations of the respective standards. Therefore, impacts are not considered cumulatively considerable. Cumulative impacts related to operational emissions would not be significant.

Analysis of CO hotspots and TAC emissions was conducted that considered cumulative traffic conditions. This analysis, discussed in Section 5.4.3, determined that the project would not cause or contribute to a CO hotspot or expose sensitive receptors to significant levels of TAC emissions under buildout conditions. Therefore, associated cumulative CO and TAC impacts would be less than significant and not cumulatively considerable.

While redevelopment may occur in other areas of the community and region, such development is unknown at this time and, therefore, is not a part of the cumulative analysis for the project.

LETTERS OF COMMENTS AND RESPONSES

	<p>E-31 CEQA Guidelines Section 15130 requires that an EIR “discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable, as defined in section 15065(a)(3).” CEQA Guidelines Section 15065(a)(3) addresses mandatory findings of significance and states that “cumulatively considerable” means “that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current project, and the effects of probable future projects.” Guidance for the discussion of cumulative impacts specifically state that the EIR “should not discuss impacts which do not result in part from the project evaluated in the EIR” (CEQA Guidelines Section 15130(a)(1)). Discussion of cumulative impacts “need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact” (CEQA Guidelines Section 15130(b)).</p> <p>The comment states that the Draft EIR did not include a reasonable analysis of cumulative impacts. The comment implies that a “reasonable analysis” would include analysis of the 15 projects included on the Cumulative Projects Lists, as well as other projects in the San Diego Air Basin Region, including projected or actual air impacts of each project. Such an endeavor would be unduly unreasonable and potentially impossible, as it would require a single project’s technical study to include technical analysis of every project in existence in the air basin.</p> <p>Relative to the 15 cumulative projects analyzed with the Draft EIR, two projects have been completed (Homewood Suites and Residence Inn SDP). Analysis of completed projects is assumed to be included in project air quality analysis, as constructed project emissions exist within the air basin. Two of the cumulative projects (Residence Inn SDP and Discovery Place) were exempt from CEQA analysis, which means that they categorically would not have a significant environmental effect. Two of the cumulative projects (Homewood Suites and Friars Road Mixed Use) completed an MND. The MNDs for those projects did not find either project to have a considerable cumulative effect on the environment when considered with past, present, and reasonably foreseeable future projects in the air basin. Two of the cumulative projects (Lankford Medical Office and Riverwalk) are in process and information relative to their air quality effects was not available at the time of EIR drafting.</p>
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LETTERS OF COMMENTS AND RESPONSES

	<p>The remaining eight projects processed EIRs. (Hazard Center Drive Extension analysis was included within the Hazard Center Drive Redevelopment Project EIR and is, therefore, considered part of one project for purposes of this discussion.) Of these projects, none identified a significant, unmitigated direct project impact relative to air quality and none concluded a considerable contribution to cumulative effects.</p> <p>Only one project (USD Master Plan) identified a cumulative significant and unmitigated air quality impact. This impact was due to the significant and unmitigable cumulative emissions identified in the 1996 Master Plan FEIR that would result because of the non-attainment status of the SDAB and inability of one project to control emissions in the region. Because the Master Plan as analyzed in 1996 had not been fully built out and entitled projects remain unbuilt, any added projects would only exacerbate the cumulative effect. As such, the USD Master Plan project would incrementally add to those construction period emissions and contribute to the cumulatively significant and unmitigable impacts disclosed in the previous EIR.</p> <p>The Draft EIR for the project concludes that no direct or cumulative significant air quality impacts would result from the project. Therefore, an examination of reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects is not warranted.</p>
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LETTERS OF COMMENTS AND RESPONSES

<p>E-31 (cont.)</p> <p>E-32</p> <p>E-33</p> <p>E-34</p>	<p>E. Shearer-Nguyen Re: Witt Mission Valley DEIR January 7, 2018 Page 10</p> <p>from construction or operation of such projects? (See DEIR, pp. 6-5 – 6-6, 6-11 – 6-14.) The City must, at a minimum, provide information on all 15 potential related projects.</p> <p>In the FEIR or a recirculated DEIR, please provide specific pollutant projections for, at minimum, each of the 15 concurrent projects listed in the DEIR and explain the projected cumulative impact of the Project in conjunction with additional development. Further, please provide a list of all past, present, and reasonably foreseeable future projects in the SDAB that have been found to result in significant and unavoidable air quality impacts.</p> <p>B. The DEIR's cumulative Greenhouse Gas Emissions analysis is not sufficiently specific.</p> <p>The DEIR concludes that "cumulative [GHG] impacts would be less than significant." (DEIR, p. 6-6.) The City reasons that the Project individually does not conflict with applicable regulations and plans regarding GHG emissions, that other projects have to comply with such regulations, and thus, it would not contribute to a significant cumulative impact. (<i>Ibid.</i>) The DEIR does not examine projected GHG emissions from related projects or other growth in the City of San Diego, nor estimate or examine what the cumulative emissions might be. (See <i>ibid.</i>) Further, the City does not evaluate whether it is on track to attain the carbon reduction goals in its own CAP. This does not provide sufficient qualitative information to determine whether the Project, in conjunction with other development, would significantly impact GHG emissions.</p> <p>What are the projected GHG emissions from construction and operation of the other projects listed in Table 6-1? Is there additional projected growth in San Diego that would contribute to GHG emissions? If so, what are the estimated emissions from such growth? What are the cumulative estimated emissions? How would such emissions comply with quantitative GHG emissions thresholds? Are there any projects within the City or nearby jurisdictions that have been found to result in significant and unavoidable greenhouse gas impacts? Please provide specific estimates and data.</p> <p>C. The DEIR's conclusion that increased use and density associated with related projects would not have a significant cumulative impact on fire and emergency services is not supported by substantial evidence.</p> <p>The DEIR fails to bridge the analytic gap between the raw evidence and its conclusion that the Project would not contribute to significant cumulative impacts to fire and emergency services. (See <i>Topanga, supra</i>, 11 Cal.3d at 511–512, 515 [an agency cannot simply draw conclusions – it "must set forth findings to bridge the analytic gap between the raw evidence and ultimate decision or order"]; DEIR, p. 6-8.) The DEIR states that there are no cumulative impacts to public services, including fire, emergency medical services ("EMS"), and police services. (<i>Id.</i></p>	<p>E-32 See Response Nos. E-30 and E-31.</p> <p>Pursuant to CEQA Guidelines Section 15088.5(a), a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:</p> <ol style="list-style-type: none"> 1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented. 2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance. 3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it. 4. The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. <p>None of the above have resulted therefore recirculation is not warranted.</p> <p>E-33 See Response No. B-12 as it pertains to GHG Emissions. The geographic scope of consideration for GHG emissions is global, as such emissions contribute, on a cumulative basis, to global climate change. By nature, GHG impacts are cumulative as they are the result of combined worldwide emissions over many years, and additional development would incrementally contribute to this cumulative impact. The discussion presented in Section 5.5, <i>Greenhouse Gas Emissions</i>, also serves as the</p>
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LETTERS OF COMMENTS AND RESPONSES

	<p>Project's cumulative impact analysis. As detailed in that section, a number of plans, policies, and regulations have been adopted for the purpose of reducing cumulative GHG emissions. The project has incorporated a number of sustainable features into its design to reduce overall emissions, reflecting the types of emissions reduction measures recommended by public agencies to reduce the magnitude of GHG emissions and help California achieve its statewide goals. The project would be consistent with the GHG reduction measures contained in the City's CAP, and would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. As a result, the project would not result in a cumulatively considerable contribution to impacts related to GHG emissions.</p> <p>E-34 Per the City's Significance Determination Thresholds for public facilities and services, a project would result in an adverse impact if the project would have an effect upon or result in a need for new or altered governmental services.</p> <p>Relative to police service, as concluded in Section 5.11.2 of the Draft EIR, although the project could result in an increase in service calls, the San Diego Police Department has facilities and staffing in the project area to adequately serve the project, and no new facilities or improvements to existing facilities would be required.</p> <p>Fire-rescue service, the project would be constructed in accordance with applicable fire codes and would comply with applicable City regulations. The project would provide fire safety features, such as installation of fire sprinklers. Development of the project would not conflict with the Mission Valley Community Plan, in that it would not result in an impact relative to number, size, and location of existing or planned Fire-Rescue facilities. The Fire-Rescue Department has facilities and staffing in the project area to adequately serve the project. Although the project could result in an increase in service calls, no new or expanded facilities or improvements to existing facilities would be required because of the project. As such, no direct or cumulative impact would result.</p> <p>In accordance with Sections 15126.2(a) and 15382 of the CEQA Guidelines, impacts related to public facilities and services are evaluated in light of whether the impact would result in a physical changes in the environment. Emergency response times and staffing are of concern to the City; however, these issues are not physical changes to the environment.</p>
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<p>E-34 (cont.)</p>	<p>E. Shearer-Nguyen Re: Witt Mission Valley DEIR January 7, 2018 Page 11</p> <p>at p. 6-9.) It draws this conclusion because “[t]he project does not necessitate the need to expand or provide new facilities” and “future cumulative projects... would be evaluated to ensure adequate police and fire-rescue services [and] would be required to mitigate any significant impacts” to public services. (<i>Id.</i> at p. 6-8.) However, the DEIR’s related projects list shows several projects currently being constructed that provide increased housing and office space for a significant number of people, and, as the City is aware, it continues to experience rapid population growth. (See <i>id.</i> at pp. 6-11 – 6-14 [listing multiple mixed-use projects].) By way of example, the Project is located next to another mixed-use project (“Millennium Mission Valley”), which includes 291 residential units, 14 shopkeeper units, and 9,000 square feet of office and retail space. (<i>Id.</i> at p. ES-3, 6-13.) This increase in population density will result in the need for increased fire and emergency services. The City, however, does not analyze how this increase in use and residential population would cumulatively impact existing fire and EMS services or explain why this would not result in significant impacts. (See <i>id.</i> at p. 6-9.)</p>	
<p>E-35</p>	<p>Please update the Public Services analysis to specifically examine how the increase in citywide population as a whole and, in particular, mixed-use development and the specific projects listed in Table 6.1 would increase the need for fire, EMS, and police services required to safely serve projected population growth; and the existing number of fire, EMS, and police services currently situated within required response time thresholds.</p>	<p>E-35 See Response No. E-34. The Public Services and Facilities section (Section 5.11) of the draft EIR includes analysis relative to project impacts on all public services, including police and fire.</p>
<p>E-36</p>	<p>D. As the DEIR’s cumulative impacts analysis is flawed, it also fails to provide appropriate mitigation measures.</p>	
<p>E-36</p>	<p>As described <i>supra</i>, the DEIR reaches faulty conclusions with respect to the cumulative air quality, greenhouse gas emission, and public services impacts. The DEIR’s failure to provide mitigation for these cumulative impacts, therefore, is also improper. (See generally DEIR, § 6 [failing to provide any mitigation for cumulative impacts]; Cal. Code Regs., tit. 14, § 15126.4(a)(1) [requiring mitigation measures]; 14 Cal. Code Regs., tit. 14, § 15126.4(a)(2) [requiring “fully enforceable” mitigation measures].) As requested, <i>supra</i>, please revise and recirculate the DEIR’s air quality, greenhouse gas emission, and public services cumulative impacts analyses, and, based on these updated findings, provide specific mitigation measures for the cumulative impacts created by the Project.</p>	<p>E-36 See Response Nos. B-8 and B-32. As concluded in the Draft EIR, significant impacts (direct or cumulative) relative to air quality, greenhouse gas emissions, and public services and facilities would not result from the project, therefore mitigation was not required.</p>
<p>E-37</p>	<p>VI. The DEIR’s Alternatives Analysis is Incomplete.</p>	
	<p>The CEQA alternatives analysis has been described by the California Supreme Court as the “core of an EIR.” (<i>Citizens of Goleta Valley v. Board of Supervisors</i> (1990) 52 Cal.3d 553, 564.) CEQA provides a “substantive mandate that public agencies refrain from approving projects for which there are feasible alternatives or mitigation measures” that can lessen the</p>	<p>E-37 Comment noted. This comment provides quotes from CEQA and references case law. This comment does not address the adequacy of the EIR, and no further response is required.</p>

LETTERS OF COMMENTS AND RESPONSES

<p>E-37 (cont.)</p> <p>E-38</p> <p>E-39</p> <p>E-40</p> <p>E-41</p>	<p>E. Shearer-Nguyen Re: Witt Mission Valley DEIR January 7, 2018 Page 12</p> <p>environmental impact of proposed projects. (<i>Mountain Lion Foundation v. Fish & Game Com.</i> (1997) 16 Cal.4th 105, 134, citing Pub. Resources Code § 21081 [emphasis added].) It “compels government... to mitigate... adverse effects through... the selection of feasible alternatives.” (<i>Sierra Club v. State Board of Forestry</i> (1994) 7 Cal.4th 1215, 1233, see also Pub. Resources Code § 21002.) A lead agency’s ability to comply with this mandate is predicated on a clear analysis of correct findings of a project’s impacts. “Without meaningful analysis of alternatives in the EIR, neither the courts nor the public can fulfill their proper roles in the CEQA process.” (<i>Laurel Heights, supra</i>, 47 Cal.3d at 404; <i>Preservation Action Council v. City of San Jose</i> (2006) 141 Cal.App.4th 1336, 1350.)</p> <p>An EIR’s review of Project alternatives must analyze alternatives “which are capable of avoiding or substantially lessening any significant effects of the project.” (Cal. Code Regs., tit. 14, § 15126.6(b).) An EIR’s very purpose is to identify ways to reduce or avoid significant environmental impacts. (<i>Laurel Heights, supra</i>, 47 Cal.3d at 403.) In order to achieve this purpose, the EIR must correctly identify project impacts. Yet, the Project alternatives analysis, as drafted, does not adequately assess whether alternatives would avoid or substantially lessen significant Project effects, because the DEIR either does not provide a sufficient analysis or incorrectly finds less than significant impacts, including in the areas of land use, air quality, greenhouse gas, emergency services, and health and safety. (See, <i>supra</i>.) The DEIR’s alternatives analysis, therefore, does not identify feasible alternatives that lessen adverse impacts, nor does it sufficiently examine whether the alternatives listed would mitigate or avoid Project impacts. (See DEIR, pp. 10-1 – 10-25.) This is improper.</p> <p>Please recirculate the DEIR after revising it as requested throughout this correspondence. Should a reexamination of the DEIR result in altered findings or information, please concurrently update the alternatives analysis to include options that would lessen or avoid all significant and inadequately mitigated impacts.</p> <p>VII. Conclusion</p> <p>As requested herein, please edit the DEIR to answer the questions posed and make the updates requested in this correspondence, then recirculate the revised DEIR.</p> <p>Pursuant to Section 21092.2 of the Public Resources Code and Section 65092 of the Government Code, please notify Southwest Carpenters of all CEQA actions and notices of any public hearings concerning this Project, including any action taken pursuant to California Planning and Zoning Laws. In addition, pursuant to Public Resources Code section 21167(f), please provide a copy of each Notice of Determination issued by the City or any other public entity in connection with this Project and add Southwest Carpenters to the list of interested</p>	<p>E-38 The alternatives analysis was conducted in accordance with CEQA. Section 15126.6 of the CEQA Guidelines requires the discussion of “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project”. The project does not identify any significant impacts associated with inconsistency with land use, air quality, GHG Emissions, emergency services, and health and safety; therefore, no alternatives were needed to reduce impacts to these environmental issue areas.</p> <p>Alternatives need not be analyzed at the same level as the projects, but rather must include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project consistent with CEQA Section 15126.6(d), Evaluation of Alternatives.</p> <p>E-39 Pursuant to CEQA Guidelines Section 15088.5(a), a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting, as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:</p> <ol style="list-style-type: none"> 1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented. 2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance. 3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
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LETTERS OF COMMENTS AND RESPONSES

	<p>4. The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.</p> <p>The revisions to the Final EIR include typographical edits, additional information and/or amplification of analysis pertaining to health and safety, and clarification of deviations from the development regulations. The addition of the information does not result in the inclusion of significant new information necessitating recirculation. In addition, the revisions does not deprive the public of a meaningful opportunity to comment on substantial adverse project impacts or feasible mitigation measures or alternatives that are not adopted because there are no new adverse project impacts, and additional mitigation measures are not necessitated. Therefore, the Final EIR does not require recirculation.</p> <p>E-40 See Response No. B-8, B-32, and B-39.</p> <p>E-41 Comment noted. Wittwer Parkin LLP has been added to the project's public interested parties list.</p>
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E-41
(cont.)

E. Shearer-Nguyen
Re: Witt Mission Valley DEIR
January 7, 2018
Page 13

parties in connection with this Project. All notices should be directed to my attention. Please send all notices by email, or if email is unavailable, by U.S. Mail to:

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Wittwer Parkin LLP
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nwhipps@wittwerparkin.com
amccarroll@wittwerparkin.com

Thank you for considering these comments.

Very truly yours,
WITTWER PARKIN LLP

Nicholas Whipps

<div data-bbox="338 235 548 277" data-label="Image"> </div> <div data-bbox="367 339 510 431" data-label="Text"> <p>401 B Street, Suite 800 San Diego, CA 92101-4231 (619) 699-1900 Fax (619) 699-1905 sandag.org</p> </div> <div data-bbox="535 339 651 362" data-label="Text"> <p>January 7, 2019</p> </div> <div data-bbox="915 344 1064 365" data-label="Text"> <p>File Number 3300300</p> </div> <div data-bbox="535 396 854 482" data-label="Text"> <p>E. Shearer-Nguyen City of San Diego Development Services Center 1222 1st Avenue, MS 501 San Diego, CA 92101</p> </div> <div data-bbox="535 496 716 519" data-label="Text"> <p>Dear Ms. Shearer-Nguyen:</p> </div> <div data-bbox="535 535 1020 579" data-label="Text"> <p>Subject: Witt Mission Valley (Project No. 562674) Draft Environmental Impact Report</p> </div> <div data-bbox="535 596 1058 786" data-label="Text"> <p>Thank you for the opportunity to comment on the Witt Mission Valley Draft Environmental Impact Report (DEIR). The San Diego Association of Governments (SANDAG) appreciates the City of San Diego's efforts to implement the policies included in San Diego Forward: The Regional Plan (2015 Regional Plan) that emphasize the need for better land use and transportation coordination. These policies will help provide people with more travel and housing choices, protect the environment, create healthy communities, and stimulate economic growth. SANDAG comments are based on policies included in the 2015 Regional Plan and are submitted from a regional perspective.</p> </div> <div data-bbox="535 800 642 821" data-label="Section-Header"> <h2>Smart Growth</h2> </div> <div data-bbox="525 839 1052 987" data-label="Text"> <p>The project site is in a Smart Growth Opportunity Area (SGOA) identified on the Smart Growth Concept Map: an Existing/Planned Town Center (SD MV-3). A key goal of the 2015 Regional Plan is to focus growth in SGOAs. Development in these areas supports a sustainable and healthy region, a vibrant economy, and an outstanding quality of life for all. Furthermore, these areas can support increased transit use, walking, and biking. Please continue facilitating access to planned transit routes and services within the plan area.</p> </div> <div data-bbox="525 1002 810 1026" data-label="Section-Header"> <h2>Transportation Demand Management</h2> </div> <div data-bbox="520 1042 1050 1167" data-label="Text"> <p>SANDAG appreciates the inclusion of transportation demand management (TDM) strategies to help mitigate traffic impacts and greenhouse gas emissions associated with the Witt Mission Valley project. Please consider incorporating the following TDM recommendations to reduce the reliance on private automobiles, reduce demand for parking, and improve circulation within and around the development:</p> </div> <div data-bbox="346 505 510 1287" data-label="Text"> <p>MEMBER AGENCIES Cities of Carlsbad Chula Vista Coronado Del Mar El Cajon Encinitas Escondido Imperial Beach La Mesa Lemon Grove National City Oceanside Poway San Diego San Marcos Santee Solana Beach Vista and County of San Diego</p> <p>ADVISORY MEMBERS Imperial County California Department of Transportation Metropolitan Transit System North County Transit District United States Department of Defense San Diego County Transit District San Diego County Water Authority Southern California Tribal Chairmen's Association Mexico</p> </div>	<p>F-1 Comment noted.</p> <p>F-2 Comment noted.</p> <p>F-3 Comment noted. The following are a list of TDM measures for the project:</p> <p><u>Management</u></p> <ul style="list-style-type: none"> • Provide a TDM Coordinator responsible for coordinating the program and ensuring TDM measures are put in place and continued. <p><u>Education</u></p> <ul style="list-style-type: none"> • Provide transit, bicycle, walk and rideshare information in a central area within the main lobby of the residential development (i.e. kiosk/bulletin board/transit screen). • Provide quarterly transit, carpool and telework information and tips to residents. <p><u>Promotion</u></p> <ul style="list-style-type: none"> • Provide signage directing residents to transit, pedestrian, bikeshare/bicycle options. • Explore providing parking for rideshare services. <p><u>Incentives</u></p> <ul style="list-style-type: none"> • Transit subsidy for residents. • Preferred parking for fuel efficient vehicles. • Preferred parking for carpool. • Access to services that reduce the need to drive, such as commercial stores, banks and restaurants within ¼ mile of the development and onsite. <p><u>Active Measures</u></p> <ul style="list-style-type: none"> • Bike-share station onsite (a minimum of six bikes available for residents). <p><u>Parking</u></p> <ul style="list-style-type: none"> • Unbundled parking whereby parking spaces would be leased or sold separately from the rental or purchase fees for the development for the life of the development. <p>Thus, the project's TDM includes some of the recommended features. Specifically, shared mobility services would be promoted and encouraged through kiosks or bulletin boards in central locations, as well in information newsletters to residents, tenants, and employees. The project includes a shuttle service to transport residents and employees to nearby transit stations.</p>
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F-3
(cont.)

- Given the project's proximity to transit and opportunity for shared parking among commercial and residential uses, consider implementing reduced parking requirements. Additional parking-management strategies could include unbundled parking, priced parking, parking cash-out, and designated parking for carpools, vanpools, and carshare vehicles. Additionally, consider maximizing parking investments through smart parking solutions that indicate real-time space availability and facilitate payment and parking reservations.
- Consider offering subsidized transit passes to employees and residents to encourage Green Line Trolley ridership and use of other regional transit services.
- Promote and encourage shared mobility services (e.g., carshare, bikeshare, scootershare, on-demand rideshare) to residents and employees. These services require designated space within the public right-of-way. Ensure that these services have dedicated curb space near the project's commercial and retail areas to help facilitate safe and convenient rideshare pick-up and drop-off.
- Sponsoring a resident-based shuttle solely for Witt Mission Valley residents may not be financially viable without adequate demand. As other proximate projects open (e.g., Town and Country, Riverwalk, Union-Tribune, Legacy International Center), consider partnering to subsidize a fleet of shared neighborhood electric vehicles (NEVs) for community residents. Proximate developments also could jointly subsidize a NEV shuttle service, like the Free Ride Everywhere Downtown service in Downtown San Diego, that provides short rides to the nearby retail and commercial destinations and transit centers. NEVs could help Mission Valley residents, employees, and visitors fulfill short trips within and around the community. SANDAG sponsored Senate Bill 1151 (Bates, 2018) to authorize any city within San Diego County to establish a NEV transportation plan.
- As indicated in the DEIR, a designated transportation coordinator can help manage and monitor a wide variety of transportation programs for residents, tenants, and employees. The carpool coordinator should expand their offerings to promote carpool and other viable alternative modes of transportation such as vanpool, transit, biking, and shared mobility services.

F-4

- The SANDAG TDM program is known as iCommute. Please remove any outdated references to RideLink throughout the DEIR.

F-5

iCommute can assist with developing commuter benefit programs for employees and promoting regional commuting services to tenants and employees. Such programs and services include the SANDAG Vanpool Program, which offers a subsidy of up to \$400 per month for eligible vans; the Guaranteed Ride Home service; and support for carpool, transit, and biking. More information about regional TDM programs can be found at iCommuteSD.com.

Active Transportation

Please continue enhancing connections for persons biking and walking between the public right-of-way and private and communal spaces on the property. For example, please consider improving access to bike parking and increasing the width of internal circulation pathways. Similarly, please consider increasing the widths of the sidewalk and parkway (currently proposed for five feet) to promote a comfortable, social, and safe walking space for pedestrians.

2


F-4 Comment noted. "RideLink" references have been replaced in the EIR with "iCommute."

F-5 The project enhances connections for persons biking and walking between the public right-of-way and private and communal spaces on the property with designated, enhanced pedestrian accessways. Bicycle parking would be easily accessed for all residents within a central communal bicycle parking area, secured within the parking garage, in general proximity to the bike shop provided on site to allow tenants to perform bicycle maintenance and repair. Bicycle parking for visitors and employees includes three short-term bicycle stalls adjacent to the leasing office, as well as two long-term spaces.

The project proposes a five-foot wide non-contiguous sidewalk along Camino de la Reina and a five-foot parkway adjacent to the street. The project proposes sidewalks on Camino de la Siesta and Camino del Rio North that are five-feet wide and parkways that are five-feet wide. Street trees consistent with those proposed in the landscape plan for the Millennium Mission Valley project, located immediately east of the project, would be provided within the parkway for design continuity and to create a "Main Street" feel at this gateway to the Mission Valley community.

As a result of the project being located within the floodplain, proposed structures must be raised. To soften the visual appearance of the project from Camino de La Reina, low terraced walls functioning as raised planters provide the necessary elevation while minimizing the visual effect to motorists and pedestrians along public streets the surround the project site. Each planter provides ample space for more mature plantings. The project creates an attractive and inviting street scene, and the reduced sidewalk and parkway widths do not affect pedestrian access nor detract from public views. Incorporating the project's design into the active realm of the pedestrian through the provision of a plaza area connected to the public sidewalk by way of a broad grand staircase results in a more desirable project.

LETTERS OF COMMENTS AND RESPONSES

<p>F-6</p> <p>F-7</p> <p>F-8</p>	<p>Please include adequate connections to existing public bicycle infrastructure. Bikeways from the proposed development should radiate outwardly to provide necessary connections that encourage non-motorized travel and transit utilization. The existing Class III bike route may need to be improved to achieve this goal.</p> <p>Other Considerations</p> <p>SANDAG has a number of resources that can be used for additional information on or clarification of topics discussed in this letter. The following relevant resources can be found at sandag.org:</p> <ul style="list-style-type: none"> • Designing for Smart Growth: Creating Great Places in the San Diego Region • Parking Strategies for Smart Growth • Trip Generation for Smart Growth • Planning and Designing for Pedestrians: Model Guidelines for the San Diego Region • SANDAG Regional Parking Management Toolbox • Riding to 2050: The San Diego Regional Bike Plan <p>When available, please send any additional environmental documents related to this project to:</p> <p>Intergovernmental Review c/o SANDAG 401 B Street, Suite 800 San Diego, CA 92101</p> <p>SANDAG appreciates the opportunity to comment on the City of San Diego's Witt Mission Valley DEIR. If you have any questions, please contact me at (619) 699-1943 or seth.litchney@sandag.org.</p> <p>Sincerely,</p>  <p>SETH LITCHNEY Senior Regional Planner</p> <p>SLI/KHE/kwa</p> <p>3</p>	<p>F-6 The project is located on Camino de la Reina, which is the first parallel street south of the San Diego River and the San Diego River Path. As such, the project site affords direct access to the Class III bike facility on Camino de la Reina and is easy access to the Class I bicycle facility that is the River Path. The draft Mission Valley Community Plan Update has a planned Class II bike lane on Camino de la Reina.</p> <p>F-7 Comment noted. SANDAG has provided a list of resources that can be used for additional information relative to the topics discussed in Comment Letter F.</p> <p>F-8 Comment noted. SANDAG is included on the list of agencies to receive environmental documents prepared by the City of San Diego.</p>
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EIR

WITH MISSION VALLEY



Final Environmental Impact Report

May 2019

WITT MISSION VALLEY

ENVIRONMENTAL IMPACT REPORT

MAY 2019

SCH No. 2017111027

PTS No. 562674

TABLE OF CONTENTS

List of Acronyms and Abbreviations

EXECUTIVE SUMMARY	ES-1
1.0 INTRODUCTION	1-1
1.1 PURPOSE AND LEGAL AUTHORITY	1-1
1.1.1 Notice of Preparation and Scoping Meeting	1-1
1.1.2 Authority and Intended Uses of the EIR	1-1
1.1.3 Availability and Review of the Draft EIR	1-2
1.1.4 Responsible and Trustee Agencies	1-2
1.2 SCOPE AND CONTENT OF EIR	1-3
1.2.1 Scope of EIR	1-3
1.2.2 Format of EIR	1-3
2.0 ENVIRONMENTAL SETTING	2-1
2.1 REGIONAL SETTING	2-1
2.2 PROJECT LOCATION AND SURROUNDING LAND USES	2-1
2.3 EXISTING SITE CONDITIONS	2-2
2.4 PUBLIC SERVICES	2-2
2.4.1 Police	2-2
2.4.2 Fire Safety	2-2
2.4.3 Library Services	2-2
2.4.4 School Services	2-2
2.4.5 Recreation	2-3
2.5 PLANNING CONTEXT	2-3
2.5.1 City of San Diego General Plan	2-3
2.5.2 Mission Valley Community Plan	2-4
2.5.3 Zoning	2-4
2.6 REGIONAL PLANS	2-5
2.6.1 Montgomery Field Airport Land Use Compatibility Plan	2-5
2.6.2 San Diego International Airport, Airport Land Use Compatibility Plan	2-5
2.6.3 San Diego River Park Master Plan	2-6
2.6.4 San Diego Regional Air Quality Strategy	2-6
2.6.5 San Diego Forward: The Regional Transportation Plan	2-6
2.6.6 Water Quality Control Plan for the San Diego Basin	2-6
2.6.7 Multiple Species Conservation Program Subarea Plan/Multi-Habitat Planning Area	2-7
3.0 PROJECT DESCRIPTION	3-1
3.1 PURPOSE AND OBJECTIVES OF THE PROPOSED PROJECT	3-1
3.1.1 Project Purpose	3-1
3.1.2 Project Objectives	3-1
3.2 PROJECT CHARACTERISTICS	3-2
3.2.1 Site Plan	3-2
3.2.2 Architectural Design	3-3
3.2.3 Vehicular and Pedestrian Access	3-3
3.2.4 Landscape Concept Plan	3-3

3.2.5	Grading Plan.....	3-4
3.3	DISCRETIONARY ACTIONS	3-4
4.0	HISTORY OF PROJECT CHANGES	4-1
5.0	ENVIRONMENTAL ANALYSIS.....	5-1
5.1	Land Use.....	5.1-1
5.1.1	Existing Conditions.....	5.1-1
5.1.2	Regulatory Framework.....	5.1-1
5.1.3	Impact Analysis.....	5.1-15
5.2	Transportation/Circulation.....	5.2-1
5.2.1	Existing Conditions.....	5.2-1
5.2.2	Impact Analysis.....	5.2-3
5.3	Visual Effects and Neighborhood Character.....	5.3-1
5.3.1	Existing Conditions.....	5.3-1
5.3.2	Regulatory Framework.....	5.3-3
5.3.3	Impact Analysis.....	5.3-4
5.4	Air Quality.....	5.4-1
5.4.1	Existing Conditions.....	5.4-1
5.4.2	Regulatory Framework.....	5.4-3
5.4.3	Impact Analysis.....	5.4-7
5.5	Greenhouse Gas Emissions.....	5.5-1
5.5.1	Existing Conditions.....	5.5-1
5.5.2	Regulatory Framework.....	5.5-5
5.5.3	Impact Analysis.....	5.5-12
5.6	Energy.....	5.6-1
5.6.1	Existing Conditions.....	5.6-1
5.6.2	Regulatory Framework.....	5.6-3
5.6.3	Impact Analysis.....	5.6-7
5.7	Noise.....	5.7-1
5.7.1	Existing Conditions.....	5.7-1
5.7.2	Regulatory Framework.....	5.7-3
5.7.3	Impact Analysis.....	5.7-7
5.8	Historical Resources.....	5.8-1
5.8.1	Existing Conditions.....	5.8-1
5.8.2	Regulatory Framework.....	5.8-2
5.8.3	Impact Analysis.....	5.8-4
5.9	Tribal Cultural Resources.....	5.9-1
5.9.1	Existing Conditions.....	5.9-1
5.9.2	Regulatory Framework.....	5.9-2
5.9.3	Impact Analysis.....	5.9-3
5.10	Health and Safety.....	5.10-1
5.10.1	Existing Conditions.....	5.10-1
5.10.2	Regulatory Framework.....	5.10-1
5.10.3	Impact Analysis.....	5.10-5
5.11	Public Services and Facilities.....	5.11-1
5.11.1	Existing Conditions.....	5.11-1
5.11.2	Impact Analysis.....	5.11-3
5.12	Public Utilities.....	5.12-1
5.12.1	Existing Conditions.....	5.12-1

5.12.2	Impact Analysis.....	5.12-6
6.0	CUMULATIVE EFFECTS	6-1
6.1	Plans Considered for Cumulative Effects Analysis.....	6-1
6.1.1	General Plan.....	6-1
6.1.2	Mission Valley Community Plan.....	6-2
6.2	Projects Considered for Cumulative Effects Analysis	6-2
6.3	Cumulative Effects Analysis.....	6-2
6.3.1	Cumulative Impacts Found to be Significant.....	6-2
6.3.2	Cumulative Impacts Found Not to be Significant.....	6-3
7.0	EFFECTS NOT FOUND TO BE SIGNIFICANT.....	7-1
7.1	Agricultural Resources and Forestry.....	7-1
7.2	Biological Resources	7-1
7.3	Geologic Condition.....	7-1
7.4	Hydrology.....	7-5
7.5	Mineral Resources.....	7-7
7.6	Paleontological Resources	7-7
7.7	Water Quality.....	7-8
8.0	SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES	8-1
9.0	GROWTH INDUCEMENT	9-1
10.0	ALTERNATIVES.....	10-1
10.1	Alternatives Considered But Rejected.....	10-2
10.1.1	Alternative Location Alternative.....	10-2
10.1.2	PDO Multiple Use Zone Consistency Alternative.....	10-3
10.2	Alternatives Considered	10-4
10.3	Alternatives Analysis.....	10-5
10.3.1	Alternative 1 – No Project/No Build Alternative.....	10-5
10.3.2	Alternative 2 – Reduced Density Alternative.....	10-9
10.3.3	Alternative 3 – All Commercial Development Alternative.....	10-15
10.4	Environmentally Superior Alternative.....	10-20
11.0	MITIGATION MONITORING AND REPORTING PROGRAM.....	11-1
11.1	Monitoring Activities.....	11-1
11.2	Program Procedures	11-1
11.3	Summary of Project Impacts and Mitigation Measures.....	11-2
12.0	REFERENCES.....	12-1
13.0	INDIVIDUALS AND AGENCIES CONSULTED	13-1

APPENDICES

- Appendix A – Notice of Preparation and Comment Letters
- Appendix B – Transcript of Public Scoping Meeting
- Appendix C – CAP Consistency Checklist
- Appendix D – Focused Transportation Study
- Appendix E – Air Quality Technical Report
- Appendix F – Letters/Responses to Service Providers
- Appendix G – Exterior Noise Analysis Report
- Appendix H – Report of Preliminary Geotechnical Investigation
- Appendix I – Potential Historic Resources Review
- Appendix J – Phase I Environmental Site Assessment
- Appendix K – Limited Phase II Subsurface Investigation Report
- Appendix L – Envirofacts and GeoTracker Searches
- Appendix M-1 – Conditional Letter of Map Revision
- Appendix M-2 – Floodplain Information and No Rise Certification
- Appendix N – Waste Management Plan
- Appendix O – Preliminary Drainage Study
- Appendix P – Priority Development Project Storm Water Quality Management Plan
- Appendix Q – Soil Management Plan and DEH Correspondence

FIGURES

Figure 2-1.	Regional Map	2-8
Figure 2-2.	Vicinity Map	2-9
Figure 2-3.	Project Location Map	2-10
Figure 2-4.	Existing Site Condition	2-11
Figure 2-5.	City of San Diego General Plan Land Use Map	2-12
Figure 2-6.	Mission Valley Community Plan Land Use Map	2-13
Figure 2-7.	Existing Zoning	2-14
Figure 2-8.	Montgomery Field ALUCP Airport Influence Area	2-15
Figure 2-9.	San Diego International Airport ALUCP Airport Influence Area	2-16
Figure 2-10.	MHPA Exhibit	2-17
Figure 3-1.	Witt Mission Valley Site Plan	3-5
Figure 3-2a.	Project Elevations - North Elevation and Perspective	3-6
Figure 3-2b.	Project Elevations - East Elevation and Perspective	3-7
Figure 3-2c.	Project Elevations - South Elevation and Perspective	3-8
Figure 3-2d.	Project Elevations - West Elevation and Perspective	3-9
Figure 3-2e.	Project Elevations – Entry Drive Elevations and Perspective	3-10
Figure 3-2f.	Project Elevations – Pool Courtyard Elevations and Perspective	3-11
Figure 3-2g.	Project Elevations –Passive Courtyard Elevations and Perspective	3-12
Figure 3-2h.	Project Elevations –Retail Building Elevations and Perspective	3-13
Figure 3-2i.	Project Elevations – Commercial Building Elevations and Perspective	3-14
Figure 3-3.	Access and Open Space Diagram	3-15
Figure 3-4.	Landscape Planting Plan	3-16
Figure 3-5.	Grading Plan	3-17
Figure 5.1-1.	City of San Diego General Plan Village Propensity Map	5.1-54
Figure 5.1-2.	Mission Valley Community Plan – Pedestrian Circulation System	5.1-55

Figure 5.1-3.	Mission Valley Community Plan Urban Design – Landmarks and Community Entrances.....	5.1-56
Figure 5.1-4.	Future Exterior Noise Levels (CNEL).....	5.1-57
Figure 5.2-1.	Existing Average Daily Traffic.....	5.2-17
Figure 5.2-2.	Project Only Trip Distribution.....	5.2-18
Figure 5.2-3.	Project Only Average Daily Traffic.....	5.2-19
Figure 5.2-4.	Existing with Project Average Daily Traffic.....	5.2-20
Figure 5.2-5.	Other Projects Average Daily Traffic.....	5.2-21
Figure 5.2-6.	Near Term Project Average Daily Traffic.....	5.2-22
Figure 5.2-7.	Near Term with Project Average Daily Traffic.....	5.2-23
Figure 5.2-8.	Horizon Year 2035 without Project Average Daily Traffic.....	5.2-24
Figure 5.2-9.	Horizon Year 2035 with Project Average Daily Traffic.....	5.2-25
Figure 5.3-1.	Perspective View – Project Entry from Camino de la Siesta.....	5.3-9
Figure 5.4-1.	Wind Rose – MCAS Miramar.....	5.4-15
Figure 5.7-1.	Sound Level Measurement Locations.....	5.7-12
Figure 5.10-1.	San Diego International Airport Compatibility Policy Map: Overflight.....	5.10-12
Figure 5.10-2.	San Diego International Airport Airspace Protection Boundary.....	5.10-13
Figure 5.10-3.	Montgomery Field Airport Compatibility Policy Map: Part 77 Airspace Protection.....	5.10-14
Figure 5.11-1.	Location of Public Services.....	5.11-12
Figure 6-1.	General Location of Cumulative Projects.....	6-13

TABLES

Table ES-1.	Summary of Environmental Impacts and Mitigation Measures.....	ES-10
Table 5.1-1.	City of San Diego Noise Compatibility Guidelines.....	5.1-7
Table 5.1-2.	General Plan Consistency Analysis.....	5.1-23
Table 5.1-3.	Mission Valley Community Plan Consistency Analysis.....	5.1-38
Table 5.1-4.	Mission Valley PDO Development Regulations.....	5.1-20
Table 5.1-5.	Mission Valley PDO Consistency Analysis.....	5.1-43
Table 5.1-6.	Mission Valley ADT Generation.....	5.1-18
Table 5.1-7.	Future Traffic Volume Projections.....	5.1-19
Table 5.1-8.	Future Exterior Roadway Noise Levels (dBA CNEL).....	5.1-20
Table 5.2-1.	Existing Street Segment Levels of Service.....	5.2-3
Table 5.2-2.	Existing Intersection Levels of Service.....	5.2-3
Table 5.2-3.	Witt Mission Valley Project Trip Generation.....	5.2-5
Table 5.2-4.	Existing with Project Street Segment Levels of Service.....	5.2-6
Table 5.2-5.	Existing with Project Intersection Levels of Service.....	5.2-7
Table 5.2-6.	Near Term Project Street Segment Levels of Service.....	5.2-8
Table 5.2-7.	Near Term without Project Intersection Levels of Service.....	5.2-8
Table 5.2-8.	Near Term with Project Street Segment Levels of Service.....	5.2-9
Table 5.2-9.	Near Term with Project Intersection Levels of Service.....	5.2-9

Table 5.2-10.	Horizon Year 2035 without Project Street Segment Levels of Service.....	5.2-10
Table 5.2-11.	Horizon Year 2035 without Project Intersection Levels of Service	5.2-10
Table 5.2-12.	Horizon Year 2035 with Project Street Segment Levels of Service	5.2-11
Table 5.2-13.	Horizon Year 2035 with Project Intersection Levels of Service.....	5.2-11
Table 5.2-14.	Existing with and without Project Street Segment Significance	5.2-12
Table 5.2-15.	Existing with and without Project Intersection Summary.....	5.2-12
Table 5.2-16.	Near Term with and without Project Street Segment Significance.....	5.2-12
Table 5.2-17.	Near Term with and without Project Intersection Summary.....	5.2-13
Table 5.2-18.	Horizon Year 2035 with and without Project Street Segment Significance	5.2-13
Table 5.2-19.	Horizon Year 2035 with and without Project Intersection Summary	5.2-13
Table 5.4-1.	Ambient Background Concentrations.....	5.4-2
Table 5.4-2.	Ambient Air Quality Standards	5.4-5
Table 5.4-3.	Significance Criteria for Air Quality Impacts	5.4-8
Table 5.4-4.	Estimated Maximum Daily Construction Emissions.....	5.4-10
Table 5.4-5.	Operational Emissions	5.4-11
Table 5.5-1.	Global Warming Potentials and Atmospheric Lifetimes of GHGs	5.5-2
Table 5.5-2.	State of California GHG Emissions by Sector	5.5-2
Table 5.5-3.	San Diego County 2006 GHG Emissions by Category	5.5-3
Table 5.6-1.	Construction Worker Gasoline Demand	5.6-9
Table 5.6-2.	Construction Vendor Diesel Demand.....	5.6-10
Table 5.6-3.	Construction Haul Diesel Fuel Demand	5.6-10
Table 5.6-4.	Construction Equipment Diesel Fuel Demand	5.6-10
Table 5.7-1.	Sound Levels of Typical Noise Sources and Noise Environments	5.7-2
Table 5.7-2.	Table of Applicable Limits	5.7-4
Table 5.7-3.	Sound Level Measurements.....	5.7-7
Table 5.7-4.	Existing Noise Levels	5.7-7
Table 5.7-5.	Traffic Noise Significance Thresholds.....	5.7-8
Table 5.7-6.	Grading Noise Source Levels.....	5.7-9
Table 5.11-1.	Eastern Division Call Priority Response Times	5.11-2
Table 5.11-2.	Estimated Generation Rates for Witt Mission Valley Project	5.11-5
Table 6-1.	Witt Mission Valley Cumulative Projects List.....	6-10
Table 6-2.	Estimated Solid Waste Generation from the Witt Mission Valley Project Occupancy Phase	6-8
Table 10-1.	Proposed Project PDO Trip Generation Compared with the PDO Multiple Use Zone Consistency Alternative Trip Generation.....	10-4
Table 10-2.	Reduced Density Alternative Trip Generation	10-11
Table 10-3.	All Commercial Development Alternative Trip Generation	10-16
Table 10-4.	Comparison of Alternatives to Proposed Project.....	10-21
Table 11-1.	Mitigation Monitoring and Reporting Program	11-5

LIST OF ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ACM(s)	asbestos containing material(s)
A.D.	Anno Domini
ADA	American's with Disabilities Act
ADD	Assistant Deputy Director
ADRP	Archaeological Data Recovery Program
ADT	Average Daily Traffic
AHM	Acutely Hazardous Material
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AM/am	morning
AME	Archaeological Monitoring Exhibit
AMSL	above mean sea level
APCD	Air Pollution Control District
ARB	Air Resources Board
AST	above ground storage tank
Basin Plan	water quality control plan for the San Diego Basin
B.C.	Before Christ
BFE	Base Flood Elevations
BI	Building Inspector
BMP(s)	Best Management Practice(s)
BTU	British Thermal Units
CAA	Federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAC	California Administrative Code
CalEPA	California Environmental Protection Agency
CalGreen	California's Green Building Standards
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CBC	California Building Code
CBD	Center for Biological Diversity
CCR	California Code of Regulations
CD	construction documents
CDs	compact discs
CDFW	California Department of Fish and Wildlife
CEFS	California Emission Forecasting System
CEIDARS	California Emission Inventory Development and Reporting System
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response Compensation
CFS/cfs	cubic feet per second
Checklist	San Diego Climate Action Plan Consistency Checklist
CGC	California Government Code
CH ₄	methane
CHRIS	California Historic Resources Information System
City	City of San Diego
CLOMR-F	Condition Letter of Map Revision
CM	Construction Manager

LIST OF ACRONYMS AND ABBREVIATIONS

CNEL	community noise equivalent level
CNFF	Cleveland National Forest Foundation
CNRA	California Natural Resource Agency
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalents
CPTED	Crime Prevention Through Environmental Design
CPUC	California Public Utilities Commission
CRHR	California Register of Historic Resources
CSVR	Consultant Site Visit Record
dB	decibel
dBA	A-weighted decibel
DEH	County Department of Environmental Health
°	degrees, as in degrees Fahrenheit
DID	Development Intensity District
DIF	Development Impact Fee
DSD	Development Services Department
DTSC	Department of Toxic Substances
DVDs	Digital Versatile Discs
EAP	Energy Action Plan
EAS	Environmental Analysis Section
ED	Environmental Document
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act of 2007
EMFAC	emissions factors
EPA	Environmental Protection Agency
ESA	Environmental Assessment
EPIC	Energy Policy Initiative Center
F	Fahrenheit
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration
FY	Fiscal Year
GCC	global climate change
GHG	greenhouse gas
g/l	grams per liter
GWP	global warming potential
HAP(s)	hazardous air pollutant(s)
HCD	Housing and Community Development
HCM	Highway Capacity Manual
HFC(s)	hydrofluorocarbons
HFE	hydrofluorinated ethers
HMMD	Hazardous Materials Management Division
hr	hour
H.R.	House Resolution
HREC(s)	Historical Recognized Environmental Condition(s)

LIST OF ACRONYMS AND ABBREVIATIONS

HRG	Historic Resources Guidelines
H ₂ S	hydrogen sulfide
HVAC	heating, ventilation, and air conditioning
Hz	hertz
I-	Interstate, as in I-8
in/sec	inches per second
IPCC	Intergovernmental Panel on Climate Change
ISO	California Independent System Operator
ISTEA	Intermodal Surface Transportation Efficiency Acts of 1991
kV	kilovolt
kWH	kilowatt hours
lbs	pounds
IALCFS	Low Carbon Fuel Standard
LDC	Land Development Code
Ldn	day-night average level
LEED	Leadership in Energy and Environmental Design
Leq	equivalent continuous sound level
LOS	Level of Service
LTRP	long-term energy resource plan
LUST	Leaking Underground Storage Tank
MCAS Miramar	Marine Corps Air Station Miramar
MCE	Maximum Considered Earthquake
mg/Kg	milligram per kilogram
µg/m ³	micrograms per cubic meter
MHPA	Multi Habitat Planning Area
MLD	Most Likely Descendent
mm/sec	millimeters per second
MMC	Mitigation Monitoring Coordination
MMR	Mitigation Monitoring Report
MMRP	Mitigation Monitoring Reporting Program
MMT	millions of metric tons
mph	miles per hour
MSCP	Multiple Species Conservation Program
MT	metric tons
MV-CR	Mission Valley Commercial Retail
MVPDO	Mission Valley Planned District Ordinance
MW	megawatt
MXD	Mixed Use Development
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NESHAP	National Emission Standard for Hazardous Air Pollutants
NF ₃	nitrogen trifluoride
NOC	Notice of Completion
NOP	Notice of Preparation
NO	nitrogen oxide
NOx	oxides of nitrogen

LIST OF ACRONYMS AND ABBREVIATIONS

NO ₂	nitrogen dioxide
NRHP	National Register of Historic Places
NTP	Notice to Proceed
O ₃	ozone
OCA	off-site consequence analysis
OHP	Office of Historic Preservation
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
Pb	lead
PCB	polychlorinated biphenyl
PDP	Planned Development Permit
PDO	Planned Development Ordinance
PFC(s)	perfluorocarbons
PI	Principal Investigator
PM/pm	afternoon
PM _{2.5}	particulate matter less than 2.5 microns in diameter
PM ₁₀	particulate matter of 10 microns in diameter or smaller
ppm	parts per million
PPV	peak particulate velocity
PRC	Public Resources Code
PTS	Project Tracking System
PVC	polyvinyl chloride
Qal	Aluminum
Qaf	Artificial Fill
RAQS	Regional Air Quality Strategy
RE	Resident Engineer
REC(s)	Recognized Environmental Condition(s)
Regional Plan	San Diego Forward: The Regional Transportation Plan
RFS	renewable fuels
River	San Diego River
RMPP	Risk Management Prevention Plan
ROG	Reactive Organic Gas
RPS	renewable portfolio standard
RTP	Regional Transportation Plan
SANDAG	San Diego Association of Governments
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCAG	Southern California Association of Governments
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDCGHGI	San Diego Greenhouse Gas Inventory
SDCRAA	San Diego County Regional Airport Authority
SDFD	San Diego Fire-Rescue Department
SDG&E	San Diego Gas and Electric
SDIA	San Diego International Airport
SDMC	San Diego Municipal Code

LIST OF ACRONYMS AND ABBREVIATIONS

SDP	Site Development Permit
SDPD	San Diego Police Department
SDPL	San Diego Public Library
SDUSD	San Diego Unified School District
SF ₆	sulfur hexafluoride
SFHA	Special Flood Hazard Area
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SO ₂	sulfur dioxide
<u>SMP</u>	<u>Soil Management Plan</u>
SR	State Route, as in SR 163
STC	sound transmission class
TAC(s)	Toxic Air Contaminant(s)
Tc	time of concentration
TCR	Tribal Cultural Resource
TDM	Transportation Demand Management
TEA-21	Transportation Equity Act for the 21 st Century
TLV-TWA	Threshold Limit Value-Time Weighted Average
TLV-STEL	Threshold Limit Value-Short Term Exposure Limit
TPA	Transit Priority Area
<u>TPH</u>	<u>total petroleum hydrocarbons</u>
TPQ	Threshold Planning Quantity
TST	Stadium Conglomerate
UBC	Universal Building Code
UFC	Uniform Fire Code
ug/L	microgram per liter
USAI	Urban Systems Associates, Inc.
USDA	United States Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGBC	United States Green Building Council
UST(s)	Underground Storage Tank(s)
<u>VAC</u>	<u>Voluntary Assistance Program</u>
VMT	vehicle miles traveled
VOC	Volatile Organic Compounds
WMP	Waste Management Plan

EXECUTIVE SUMMARY

This Environmental Impact Report (EIR) has been prepared for the Witt Mission Valley project, a private development project located in the Mission Valley Community Plan area. This document analyzes the potential environmental effects associated with implementation of the project (including direct and indirect impacts, secondary impacts, and cumulative effects). Prepared under the direction of the City of San Diego's Environmental Analysis Section, this EIR reflects the independent judgment of the City of San Diego.

PURPOSE AND SCOPE OF THE EIR

This EIR 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 (PRC 21000 et seq.), State CEQA Guidelines (CAC 15000 et seq.), and City of San Diego's EIR Preparation Guidelines. Per Section 21067 of CEQA and Sections 15367 and 15050 through 15053 of the State CEQA Guidelines, the City of San Diego is the *Lead Agency* under whose authority this document has been prepared. As an informational document, this EIR is intended for use by the City of San Diego decision-makers and members of the general public in evaluating the potential environmental effects of the project.

This EIR provides decision-makers, public agencies, and the public in general with detailed information about the potential significant adverse environmental impacts of the project. By recognizing the environmental impacts of the project, decision-makers will have a better understanding of the physical and environmental changes that would accompany the project should it be approved. The EIR includes recommended mitigation measures that, when implemented, would provide the Lead Agency with ways to substantially lessen or avoid significant effects of the project on the environment, whenever feasible. Alternatives to the project are presented to evaluate alternative development scenarios that can further reduce or avoid significant impacts associated with the project.

It is intended that this EIR, once certified, serve as the primary environmental document for those actions. According to Section 15162 of the CEQA Guidelines, when an EIR has been certified for a project, no subsequent EIR shall be prepared for that project unless the Lead Agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effect;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR;
 - (B) Significant effects previously examined will be substantially more severe than shown in the

- previous EIR;
- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (D) Mitigation measures or alternative which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

In accordance with CEQA Guidelines Section 15082(a), an Notice of Preparation (NOP), dated November 8, 2017, was prepared for the project and distributed to all Responsible and Trustee Agencies, as well as other agencies and members of the public who may have an interest in the project. The purpose of the NOP was to solicit comments on the scope and analysis to be included in the EIR for the project. A copy of the NOP and letters received during its review are included in Appendix A to this EIR. In addition, comments were also gathered at a public scoping session held for the project on November 28, 2017, at the Mission Valley Branch Library. A transcript of the public scoping meeting is included in Appendix B.

Based on an initial review of the project and comments received, the City of San Diego determined that the EIR for the project should address the following environmental issues:

- Land Use
- Transportation/Circulation
- Visual Effects and Neighborhood Character
- Air Quality
- Greenhouse Gas Emissions
- Energy
- Noise
- Historical Resources
- Tribal Cultural Resources
- Health and Safety
- Public Services and Facilities
- Public Utilities
- Cumulative Effects

Based on the analysis contained in Section 5.0, *Environmental Analysis*, of this EIR, the project could result in significant impacts to Transportation/Circulation, Historical Resources, and Tribal Cultural Resources. Mitigation has been provided for all potentially significant impacts to reduce impacts to below a level of significance.

PROJECT LOCATION AND SETTING

The regional and local setting of the project is discussed in Section 2.0, *Environmental Setting*, of this EIR. The project is located at 588 Camino del Rio North in the Mission Valley community of the City of San Diego, within San Diego County. Situated north of Camino del Rio North and Interstate 8 (I-8), east of Camino de la Siesta, west of Camino del Arroyo, and south of Camino de la Reina, the project site encompasses approximately 5.13 acres. Multi-family residential developments are located north of the project site, beyond which is the San Diego River. The Millennium Mission Valley mixed-use project is under construction to the east of the project site. Farther east of the project site, beyond the Millennium Mission Valley project, is an automotive dealership and Westfield Mission Valley West shopping center, which provides a mix of commercial and restaurant establishments. West of the project site, across Camino de la Siesta, is a four-story commercial office building and a 12-story commercial office building with a mixture of surface and structured parking. Farther west of the project site, beyond the commercial office buildings, is State Route 163 (SR 163). I-8 is located south of the project site.

PROJECT BASELINE

CEQA Guidelines Section 15125(a) guides the discussion of the environmental setting for the project and advises in the establishment of the project baseline. According to CEQA, “[a]n EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation 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 project is the fully developed site with automotive dealership sales and offices, service bays, and exterior auto sales areas.

PROJECT DESCRIPTION

The project proposes demolition of existing structures (38,070 square feet) and on-site surface parking and construction of a mixed-use development consisting of 277 multi-family residential units (including 10 shopkeeper units), 6,000 square feet of commercial retail space, and 3,600 square feet of commercial office space. The project is being designed to comply with the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) for Homes Silver Certification standards. (For a full description of the project, please see Section 3.0, *Project Description*.) The project requires approval of a Site Development Permit and a Planned Development Permit, with action by the Planning Commission (Process Four). The elements of these various project actions are described in detail in Section 3.0, *Project Description*, of this EIR.

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION

Section 5.0 of this EIR presents the *Environmental Analysis* of the project. Based on the analysis contained in Section 5.0 of this EIR, the project would result in significant impacts to: Transportation/Circulation, Historical Resources, and Tribal Cultural Resources. Mitigation has been provided for all potentially significant impacts to reduce the impact to below a level of significance. The alternatives identified in this analysis are intended to further reduce or avoid significant environmental impacts associated with the project.

Table ES-1, *Summary of Environmental Impacts and Mitigation Measures*, summarizes the potential environmental impacts of the project by issue area, as analyzed in Section 5.0, *Environmental Analysis*, of this EIR. The table also provides a summary of the mitigation measures proposed to avoid or reduce significant adverse impacts. The significance of environmental impacts after implementation of the recommended mitigation measures is provided in the last column of Table ES-1. Responsibilities for monitoring compliance with each mitigation measure are provided in Section 10.0, *Mitigation Monitoring and Reporting Program*, of this EIR.

POTENTIAL AREAS OF CONTROVERSY

Pursuant to CEQA Guidelines Section 15123(b)(2), an EIR shall identify areas of controversy known to the Lead Agency, including issues raised by the agencies and the public, and issues to be resolved, including the choice among alternatives and whether and how to mitigate for significant effects. The NOP for the EIR was distributed on November 8, 2017, for a 30-day public review and comment period. Comment letters were received during the NOP public scoping period requesting that the EIR include analysis of the following issues: traffic, hazardous materials, and archaeological and tribal cultural resources. These issue areas are analyzed in Section 5.0, *Environmental Analysis*, of this EIR.

SUMMARY OF PROJECT ALTERNATIVES

Alternatives Considered but Rejected

The *Alternatives* section (Section 10.0) of this EIR includes a discussion of alternatives which were considered early in the project design process but which have been rejected. This section includes an Alternative Location Alternative. This *Alternative Considered but Rejected* is briefly summarized below.

Alternative Location Alternative

In accordance with CEQA Guidelines Section 15126.6(f)(2), 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 lessens any of the significant effects of the project would need to be considered for inclusion in the EIR.” The project has the potential to result in impacts to unknown subsurface archeological resources, if such resources are encountered during project construction activities. There is a potential that unknown archaeological resources could be encountered during grading and excavation. Moving the project to an alternative site in the community or other areas of the City could result in a similar or greater potential to encounter unknown subsurface archeological resources, depending on location.

Additionally, locating the project on another site could result in greater environmental effects. The project is proposed for a currently developed site. There are no native habitats or known resources located on the project site or in adjacent areas. The site has easy access to public streets and freeways and is already served by existing public facilities, services, and utilities. A similar level of intensity as the project constructed at another site in the City or County could potentially have increased levels of impacts relative to air quality, traffic, and greenhouse gas (GHG) emissions, as another site may not have the same or similar developed characteristics, walkability, and multi-modal transportation opportunities. The project site also has a potential advantage over other sites from an environmental resources standpoint, as the project site does not possess sensitive biological resources. Other sites in the City or County may contain significant sensitive resources, and development on another site could result in impacts to biological resources, which would not occur at the project site.

For these reasons, there are no other feasible alternative locations for the project. Therefore, the Alternative Location Alternative has been rejected.

PDO Multiple Use Zone Consistency Alternative

An alternative was considered that would develop the project site as a similar mixed-use development project that maximizes development intensity in accordance with the Multiple Use (MV-M) Zone in the Mission Valley Planned District Ordinance (PDO). Under the MV-M Zone in the Mission Valley PDO Guidelines, no single land use should account for more than 60 percent, nor less than 20 percent, of the average daily traffic (ADT) allocated to the project, based on the trip generation rates included in the PDO (Table 1514-03B, Development Intensity Factors of the PDO). Additionally, the predominant land use should be consistent with the Community Plan land use designation (i.e., Retail for the Witt Mission Valley project site).

The PDO Multiple Use Zone Consistency Alternative would allow no more than 60 percent commercial retail use, 20 percent residential use, and 20 percent commercial office use. Under this alternative, the residential unit count would be reduced from 277 units proposed by the project to 57 units. The commercial retail and commercial office components would be increased to approximately 20,650 square feet of commercial retail use and 21,500 square feet of commercial office use under this alternative. The alternative could include similar features to the project,

such as the street landscape features and a retail plaza. However, due to the reduced number of residential units this alternative would not support the type and amount of residential amenities proposed by the project nor would it include shopkeeper units.

When compared to the project, this alternative would result in an increase of 22 ADT compared to what would be generated by the project using the Mission Valley PDO trip generation rates. Thus, this alternative would result in increased traffic impacts when compared to the project. Additionally, there would be an increase in air quality and noise impacts, as those are related to the amount of traffic generated by a project. Relative to other environmental issues areas determined to be potentially significant in this EIR [i.e., historical resources (unknown subsurface archaeological resources), and tribal cultural resources (unknown subsurface archaeological resources)], impacts would be the same as the project, as those impacts are associated with any redevelopment of the project site.

This alternative could meet some of the project objectives, such as creating a coherent and cohesive building site and site design that is compatible in scale and character of surrounding and planned developments and enhances the existing community character in the Mission Valley community and providing a mix of commercial retail, and residential uses as in-fill development of an underutilized site. This alternative would create additional retail and job opportunities in the Mission Valley community and would provide retail amenities for the adjacent employment and residential uses that are within walking distance. However, this alternative does not substantially reduce any environmental impacts. This alternative would not avoid or minimize impacts associated with potential subsurface archaeological and tribal cultural resources and would result in a slight increase in traffic, air quality, and noise impacts. This alternative would also not meet the primary objectives of the project relative to maximizing efficient use of the project site and one that provides a transit oriented, pedestrian focused development which locates high density residential uses in proximity to transit in a manner that implements the City of Villages and Smart Growth principles. Therefore, the PDO Multiple Use Zone Consistency alternative was rejected from further analysis.

Alternatives Considered

Alternatives considered for Witt Mission Valley project, including a discussion of the “No Project” alternative, are addressed in detail in Section 10.0, *Alternatives*. Relative to the requirement to address a “No Project” alternative, CEQA Guidelines Section 15126.6(e) states that:

- (A) When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the “no project” alternative will be the continuation of the existing plan, policy or operation into the future.*
- (B) If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the “no project” alternative is the circumstance under which the project does not proceed.*

Alternatives to the project discussed in this EIR include the “No Project” alternative that is mandated by CEQA and other alternatives that were developed in the course of project planning and environmental review for the project. Specifically, the following project alternatives are addressed in this EIR:

- Alternative 1 – No Project/No Build Alternative

- Alternative 2 – Reduced Density Alternative
- Alternative 3 – All Commercial Development Alternative

Alternative 1 – No Project/No Build Alternative

Under the No Project/No Build Alternative, the project would not be implemented on the site. The automotive dealership sales and offices, service bays, and exterior auto sales areas would not be demolished and would be left as they are today. Auto dealership and service uses would continue as they do today. When compared to the project, the No Project/No Build Alternative would eliminate the potential for direct significant impacts to historical resources and tribal cultural resources, as no new development would occur. The No Project/No Build Alternative would also eliminate the potential for a cumulative impact to traffic circulation on one street segment. The No Project/No Build Alternative would reduce environmental effects associated with air quality and GHG emissions, as no new trips would occur under this alternative. There would be no impacts to public services associated with schools, libraries, and recreation, as no residential development would occur. However, based on the analysis in this EIR, none of those effects would be regarded as significant under the project. The No Project/No Build Alternative has the potential to result in slightly greater impacts to visual quality and neighborhood character and energy, although such impacts would not reach a level of significance. For all other issue areas, the No Project/No Build Alternative would result in the same level of environmental effects as the project. The No Project/No Build Alternative would not meet any of the project objectives.

Alternative 2 – Reduced Density Development

The Reduced Density Development Alternative would include a mix of residential, commercial, and retail uses, like the project. However, this alternative would reduce the number of residential units by 60 percent compared to the project, from 277 units to 160 units. Commercial office and retail square footage would be the same as the project. Development under this alternative would be more traditional with regard to the unit make-up and design, and would not provide the mix and type of housing provided by the project. As such, this alternative would eliminate the shopkeeper units and amenities that are included in the project related to supporting home-business uses. It would be assumed that the Reduced Density Development Alternative would be designed based on the USGBC LEED for Homes Silver Certification, like the project. This alternative would implement requirements of the San Diego municipal Code (SDMC) related to the provision of private and common open space areas. However, the amount of common outdoor amenity space provided to residents would be commensurately reduced, resulting in either one consolidated amenity area (versus the three provided with the project) or two amenity areas of greatly reduced size and features commensurate with the reduced unit count. Additionally, due to the overall reduction in the development intensity, this alternative would not offer quasi-public amenities, such as the pedestrian plaza fronting on Camino de la Reina. The Reduced Density Development Alternative would result in construction of a mixed-use development, parking structure, and associated surface parking. Due to the reduced development intensity, the parking structure may be wrapped, as with the project, or may be a stand-alone/exposed structure, depending on the specific design of the reduced residential component. Because less parking would be needed to support the reduction in residential units, this alternative would be served by a greater amount of surface parking. Like the project, the design under this alternative would occur in a manner compatible with surrounding buildings in west-central Mission Valley.

Like the project, the Reduced Density Development Alternative would be consistent with the General Plan, Community Plan, and existing zoning. However, less environmental impacts would result from this alternative with regards to traffic, which is identified as a significant environmental effect of the project, as a Reduced Density Development Alternative would generate fewer ADTs than the project and would not result in any cumulatively

significant traffic effects. This alternative would result in less air quality and GHG emissions, as less traffic would occur, and slightly less impacts to public services due to a smaller residential population. However, those issue areas were not found to be significant in the analysis in the EIR. This alternative would not implement land use goals of the General Plan to the extent associated with the project as it would not provide the mix and type of housing provided by the project. For all other issue areas (i.e., visual quality and neighborhood character, noise, energy, public utilities, historical, tribal cultural resources, and public services and facilities), the Reduced Density Development Alternative would result in the same level of environmental effects as the project.

This alternative would meet some of the project objectives. Specifically, this alternative would meet seven of the 10 project's objectives:

- Create a coherent and cohesive building site and site design that is compatible in scale and character and enhances the existing community character in the Mission Valley community.
- Implement a project that is sustainable based on the USGBC LEED for Homes Silver certification standards to reduce the project's overall carbon footprint, water and energy use, and generation of greenhouse gas emissions.
- In keeping with the City of Villages and Smart Growth policies, provide for a mix of retail, office, and residential uses as in-fill development of an underutilized site within an urban area where public facilities, transit, and services are readily available and easily accessed via alternative modes of travel, including mass transit and active transportation.
- Enhance this portion of the Mission Valley community by creating a "Main Street" feel along Camino de la Reina, with buildings that address the street and the provision of open pedestrian areas that front on Camino de la Reina.
- Create additional retail and job opportunities in the Mission Valley community.
- Utilize architecture and design elements that ensure high quality design and aesthetics.
- Provide retail amenities for the adjacent employment and residential uses that are not only within walking distance but also capture drive-by automobile trips and walk-up trips from adjacent properties, thereby reducing the amount of routine daily trips.

This alternative would not provide opportunities for live-work space, with supporting amenities, nor would it provide for a mix and type of residential units. The Reduced Density Development Alternative would not maximize the efficiency in use of the project site nor would it cluster high-density housing opportunities in the Mission Valley community. Redevelopment of the project site to cluster high-density housing opportunities in the Mission Valley community where transit and other amenities are readily available would not occur under this alternative. This alternative would also not create a focal point/pedestrian plaza that functions as a space for social gatherings along Camino de la Reina.

Alternative 3 – All Commercial Development Alternative

An alternative was considered that would redevelop the project site as an all-commercial retail project, as allowed within the existing land use designation and zone. In order to stay within the Threshold 2 traffic limits of the PDO (i.e., no more than 1,765 ADT for the project site), 44,137 square feet of commercial retail development could occur on the project site. This alternative would be a one- to two-story retail building or buildings, with 44,137 square feet of multi-tenant retail. Parking would be provided in surface lots and/or a parking structure in accordance with City parking requirements for multi-tenant retail use. The design of the retail building(s) would be with appropriate architectural detail and in keeping with the styles, bulk, and scale of other retail developments in

west-central Mission Valley. Like the project, this alternative would be elevated out of the 100-year floodplain. Additionally, for purposes of the environmental analysis, it is assumed that the All Commercial Development Alternative would include sustainable design features required by the CAP Consistency Checklist.

Like the project, the All Commercial Development Alternative would be consistent with the General Plan, Community Plan, and existing zoning. This alternative would result in less traffic than the project but would not avoid the significant traffic impact to a segment of Camino del Rio North from Camino de la Siesta to Camino del Arroyo. There would be no impacts to public services associated with schools, libraries, and recreation, as no residential development would occur. However, based on the analysis in this EIR, none of those effects would be regarded as significant under the project. For all other issue areas (i.e., visual effects and neighborhood character, energy, public utilities, tribal cultural resources, and cumulative effects), the All Commercial Development Alternative would result in the same level of environmental effects as the project.

This alternative would meet some of the project objectives. Specifically, this alternative would meet six of the 10 project's objectives:

- Create a coherent and cohesive building site and site design that is compatible in scale and character and enhances the existing community character in the Mission Valley community.
- Implement a project that is consistent with the City's Climate Action Plan (CAP) and is sustainable based on the USGBC LEED for Homes Silver certification standards to reduce the project's overall carbon footprint, water and energy use, and generation of greenhouse gas emissions.
- Enhance this portion of the Mission Valley community by creating a "Main Street" feel along Camino de la Reina, with buildings that address the street and the provision of open pedestrian areas that front on Camino de la Reina.
- Create additional retail and job opportunities in the Mission Valley community.
- Utilize architecture and design elements that ensure high quality design and aesthetics.
- Provide retail amenities for the adjacent employment and residential uses that are not only within walking distance but also capture drive-by automobile trips and walk-up trips from adjacent properties, thereby reducing the amount of routine daily trips.

This alternative would not provide a mix of commercial retail, office, and residential uses and would not provide shopkeeper units where access to other amenities and transit are within walking distance; would not result in maximizing efficiency in use of the project site; would not redevelop the project site to cluster high-density housing opportunities in the Mission Valley community where transit and other amenities are readily available;; and would not provide quasi-public space for community use in the form of a pedestrian plaza.

Environmentally Superior Alternative

For the project, the No Project/No Build Alternative would be selected as the environmentally superior alternative, as the No Project/No Build Alternative would result in less environmental effects. However, this alternative would not meet any of the project objectives.

CEQA requires that if the No Project Alternative is selected as environmentally superior, then the EIR shall also identify an environmentally superior alternative among the other alternatives. For the project, the Reduced Density Development Alternative would be selected as the environmentally superior alternative to the project. The Reduced Density Development Alternative would eliminate the one significant cumulative traffic impact to a

segment of Camino del Rio North. The Reduced Density alternative would result in the development of 117 less residential units, thereby reducing the effect of redeveloping the project site to create much needed housing opportunities in the Mission Valley community where transit and other amenities are readily available.

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

Environmental Impacts	Mitigation Measures	Level of Significance After Mitigation
Transportation/Circulation The project could result in a cumulative impact to the street segment of Camino del Rio North from Camino de la Siesta to Camino del Arroyo under the Horizon Year plus Project condition.	Mitigation Measure 5.2-1 (MM5.2-1) presented in Section 5.2, <i>Transportation/Circulation</i> , would reduce project impacts to below a level of significance.	Mitigated to below a level of significance.
Historical Resources The project could result in direct impacts to archaeological resources.	Mitigation measure MM 5.8-1 presented in Section 5.8, <i>Historical Resources</i> , would reduce direct project impacts to archaeological resources.	Mitigated to below a level of significance.
Tribal Cultural Resources The project could result in direct impacts to unknown subsurface tribal cultural resources (archaeological), as a result of excavation and trenching for the project.	Mitigation Measure 5.8-1 (MM5.8-1) presented in Section 5.8, <i>Historical Resources</i> , would reduce project impacts to below a level of significance.	Mitigated to below a level of significance.

1.0 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 decision-makers and members of the general public in evaluating the potential environmental effects of the Witt Mission Valley 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 (PRC) 21000 et seq.], the State CEQA Guidelines [California Administrative Code (CAC) 15000 et seq.], and the City of San Diego's Environmental Impact Report Preparation Guidelines (2005). In accordance with CEQA Guidelines Section 15161 and as determined by the City of San Diego, this document constitutes a "Project EIR." The Witt Mission Valley project proposes to demolish the on-site buildings and features associated with the existing auto dealership and service development and construction of an in-fill, mixed-use development. The Witt Mission Valley project includes 277 dwelling units (including 10 shopkeeper units) constructed in a "wrap design" around a central parking structure, 6,000 square feet of commercial retail space, and 3,600 square feet of commercial office space. (For a full description of the proposed project, please see Section 3.0, *Project Description*.)

The Witt Mission Valley project requires a Site Development Permit (SDP) and a Planned Development Permit (PDP) with action by the Planning Commission (Process Four). This EIR provides decision-makers, public agencies, and the general public with detailed information about the potential significant adverse environmental impacts of the proposed Witt Mission Valley project. By recognizing the potential environmental impacts of the proposed 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 which, when implemented, would lessen or avoid project impacts. Alternatives to the proposed project are presented to evaluate feasible alternative development scenarios that can further reduce or avoid any potential significant impacts associated with the project.

1.1.1 Notice of Preparation and Scoping Meeting

A Notice of Preparation (NOP) was prepared for the project and was distributed to all Responsible and Trustee Agencies, as well as other agencies and members of the public who may have an interest in the project, on November 8, 2017. The purpose of the NOP was to solicit comments on the scope and analysis to be included in the EIR for the Witt Mission Valley project. A copy of the NOP and letters received during its review are included in Appendix A of this EIR. In addition, comments were also gathered at a public scoping session held for the project on November 28, 2017. A transcript of this public scoping meeting is included in Appendix B.

Comment letters received during the NOP public scoping period expressed concern regarding hazardous waste, traffic, tribal cultural resources, and archaeological resources. These concerns have been identified as areas of known controversy and are analyzed in Section 5.0, *Environmental Analysis*, of this EIR.

1.1.2 Authority and Intended Uses of the EIR

Per Section 21067 of CEQA and Sections 15367 and 15050 through 15053 of the State CEQA Guidelines, the City of San Diego is the *Lead Agency* under whose authority this document has been prepared. The analysis and findings in this document reflect the independent analysis and conclusions of the City of San Diego. This EIR discusses the potential significant adverse effects of the project. Where environmental impacts have been determined to be

potentially significant, mitigation measures directed at reducing or avoiding significant adverse environmental effects have been identified. In addition, feasible alternatives to the proposed project have been developed, including the No Project/No Build Alternative, Reduced Density Development Alternative, and the All Commercial Development Alternative. An analysis of the impacts of project alternatives compared to those of the proposed project provides a basis for consideration by decision-makers.

1.1.3 Availability and Review of the Draft EIR

After completion of the Draft EIR, a Notice of Completion (NOC) is published to inform the public and interested and affected agencies of the availability of the Draft EIR for review and comment. In addition, the Draft EIR is distributed directly to affected public agencies and interested organizations and individuals for review and comment.

The Draft EIR and all related technical studies have been made available for review at the offices of the City of San Diego, Development Services Department, located at 1222 First Avenue, Fifth Floor, San Diego, California 92101. Copies of the draft EIR were also available at the following public libraries:

San Diego Public Library
Central Library
330 Park Boulevard
San Diego, California 92101

Mission Valley Branch Library
2123 Fenton Parkway
San Diego, California 92108

In addition, the Draft EIR and associated technical appendices were placed on the City of San Diego website:

<http://www.sandiego.gov/city-clerk/officialdocs/notices/index.shtml>.

This EIR has been made available for review to members of the public and public agencies for 30 calendar days 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.”* (14 California Code of Regulations [CCR] 15204). (Note: The City has determined that the project is not of Statewide, Regional, or Areawide significance. In accordance with CEQA Guidelines Section 15206, submittal of the EIR to the State Clearinghouse is not required, and therefore a 30-day public review period has been established.) Following the public review period, responses to the public review comments relevant to the adequacy and completeness of the Draft EIR are prepared and compiled into the Final EIR. The City of San Diego Planning Commission, prior to any final decision on the project, will consider the Final EIR for certification.

1.1.4 Responsible and Trustee Agencies

State law requires that all EIRs be reviewed by Responsible and Trustee agencies. A Trustee Agency is defined in Section 15386 of the State CEQA Guidelines as *“a state agency having jurisdiction by law over natural resources affected by a project that is held in trust for the people of the State of California.”* Per Section 15381 of the CEQA Guidelines, *“the term ‘Responsible Agency’ includes all public agencies other than the Lead Agency which have discretionary approval power over the project.”* For the Witt Mission Valley project, due to the previous disturbance and full development of the project site, there are no natural resources on the project site. Therefore, there are no Trustee Agencies that would have jurisdiction. Additionally, there are no Responsible agencies that would have discretionary approval power over the project.

1.2 Scope and Content of EIR

1.2.1 Scope of EIR

Based on initial review of the project by the City and comments received during review of the NOP and at the public scoping meeting, the City of San Diego determined that the EIR for the proposed project should address the following environmental issues.

- Land Use
- Transportation/Circulation
- Visual Effects and Neighborhood Character
- Air Quality
- Greenhouse Gas Emissions
- Energy
- Noise
- Historical Resources
- Tribal Cultural Resources
- Health and Safety
- Public Services and Facilities
- Public Utilities
- Cumulative Effects

1.2.2 Format of EIR

In accordance with Sections 15120 through 15132 of the State CEQA Guidelines, this EIR is formatted to address the required contents of an EIR. Specifically, an *Executive Summary* is provided at the beginning of this document, which includes the conclusions of the environmental analysis and a comparative summary of the project with the alternatives analyzed in the EIR, as well as areas of controversy and any issues to be resolved. Section 1.0, *Introduction*, introduces the purpose of the EIR, provides a discussion of the public review process, and includes the scope and format of the EIR. The *Environmental Setting*, Section 2.0, provides a description of the project location and the environment of the project site, as well as the vicinity of the project site, as it exists before implementation of the proposed project. Section 3.0, *Project Description*, details the physical and operational characteristics of the project, provides the purpose and objectives of the project, and presents the required discretionary actions. Section 4.0, *History of Project Changes*, chronicles any changes that have been made to the project in response to environmental concerns raised during the City's review of the project. Section 5.0, *Environmental Analysis*, includes a description of the existing conditions relevant to each environmental topic; presents the threshold(s) of significance, based on the City of San Diego's *California Environmental Quality Act Significance Determination Thresholds* (July 2016), for the particular issue area under evaluation; identifies an issue statement or issue statements; assesses any impacts associated with implementation of the project; provides a summary of the significance of any project impacts; and presents recommended mitigation measures and mitigation monitoring and reporting, as appropriate, for each significant issue area. *Cumulative Effects* are presented under a separate discussion section (Section 6.0) based on issues that were found to be potentially cumulatively significant. Section 7.0, *Effects Not Found to be Significant*, presents a brief discussion of the environmental effects of the project that were evaluated and were found not to be potentially significant. The EIR also includes a mandatory CEQA discussion of *Significant Irreversible Environmental Changes* (Section 8.0), as well as a discussion of *Growth Inducement* (Section 9.0). Section 10.0, *Alternatives*, discusses alternatives to the project which could avoid or reduce potentially significant environmental impacts associated with implementation of the project. Section 11.0, *Mitigation Monitoring and Reporting Program*, documents the various mitigation measures required as part of the project. Section 12.0, *References*, includes a list of the reference materials consulted in the course of the EIR's preparation. Section 13.0, *Individuals and Agencies Consulted*, includes a list of agencies and individuals contacted during and responsible for the preparation of the EIR.

2.0 ENVIRONMENTAL SETTING

This section provides a description of the existing physical conditions for the Witt Mission Valley project site, as well as an overview of the local and regional environmental setting per Section 15125 of the CEQA Guidelines. Also provided in this section is a general discussion of public services serving the project site and the planning context within which the project is evaluated. Greater details relative to the setting of each environmental issue area addressed in this EIR are provided at the beginning of each impact area discussion presented in Section 5.0, *Environmental Analysis*, of this EIR.

CEQA Guidelines Section 15125(a) guides the discussion of the environmental setting for the proposed project and advises in the establishment of the project baseline. According to CEQA, “[a]n EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation 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 Witt Mission Valley project are the fully developed site as established in this *Environmental Setting* section.

2.1 Regional Setting

The Witt Mission Valley project is located in the Mission Valley community of the City of San Diego, within San Diego County (see Figure 2-1, *Regional Map*). The City of San Diego covers approximately 206,989 acres in the southwestern section of San Diego County, in Southern California. The City of San Diego is located north of the United States-Mexico border and is bordered on the north by the City of Del Mar, the City of Poway, and unincorporated County of San Diego land. On the east, the City of San Diego is bordered by the cities of Santee, El Cajon, La Mesa, and Lemon Grove, as well as unincorporated County of San Diego land. To the south, San Diego is bordered by the cities of Coronado, Chula Vista, and National City, as well as the United States-Mexico border. The Pacific Ocean forms the City of San Diego’s western border.

The Mission Valley community is located in the central portion of the City of San Diego and the San Diego Metropolitan area. The community is located approximately four miles north of downtown San Diego and seven miles east of the Pacific Ocean. The communities of Linda Vista, Serra Mesa, and Tierrasanta are located north of Mission Valley. Kensington-Talmadge, Normal Heights, Greater North Park, Uptown, and Old Town San Diego are located to the south of Mission Valley. Mission Bay Park is located west of Mission Valley. The communities of Navajo and College Area are located east of Mission Valley. As shown in Figure 2-2, *Vicinity Map*, the Witt Mission Valley project site is located in the west-central portion of the Mission Valley community.

2.2 Project Location and Surrounding Land Uses

As shown in Figure 2-3, *Project Location Map*, the Witt Mission Valley project site is located at 588 Camino del Rio North. Camino de la Reina forms the project site’s northern boundary; Camino de la Siesta is located along the western project boundary. Camino del Rio North forms the site’s southern boundary, separating the approximately 5.13-acre project site from Interstate 8 (I-8), which is located to the south of the project site. Multi-family residential developments are located north of the project site, beyond which is the San Diego River. The Millennium Mission Valley mixed-use project is under construction to the east of the project site. Farther east of the project site, beyond the Millennium Mission Valley project, is an automotive dealership and Westfield Mission Valley West shopping center, which provides a mix of commercial and restaurant establishments. West of the project site, across Camino de la Siesta, is a four-story commercial office building and a 12-story commercial office

building with a mixture of surface and structured parking. Farther west of the project site, beyond the commercial office buildings, is State Route 163 (SR 163).

Regional access to the site is provided via I-8, providing east-west travel through the City. SR 163, located approximately one-half mile west of the project site serves to connect downtown San Diego to the south to the Mira Mesa community to the north. I-805, located less than two miles east of the project site, provides travel through inland areas of the City. Direct local access to the site is via Camino del Rio North on the south, Camino de la Reina on the north, and Camino de la Siesta on the west.

2.3 Existing Site Conditions

The Witt Mission Valley project site encompasses approximately 5.13 acres. The site has been previously graded and is fully developed with a commercial automotive dealership sales and offices (Witt Lincoln), service bays, and exterior auto sales areas totaling 38,070 square feet. Parking is accommodated within surface parking lots. Landscaping is minimal, consisting of non-native ornamental vegetation, and is mostly confined to the perimeter of the property. Figure 2-4, *Existing Site Conditions*, depicts the current development on the project site.

2.4 Public Services

2.4.1 Police

The central portion of the Mission Valley community is served by beat 315 of the Eastern Division facility, located at 9225 Aero Drive. The Eastern Division serves the communities and neighborhoods of Allied Gardens, Birdland, College East, College West, Del Cerro, Grantville, Kearny Mesa, Lake Murray, Mission Valley East, Qualcomm, San Carlos, Serra Mesa, and Tierrasanta.

2.4.2 Fire Safety

The project site is served by two fire stations: Fire Station 45 and Fire Station 5. Fire Station 45 is located at 9366 Friars Road, approximately 3.7 miles east of the project site; Fire Station Number 5 located at 3902 Ninth Avenue, approximately 2.1 miles south of the project site.

2.4.3 Library Services

The project site is located in the service area of the City of San Diego Library System. The nearest library to the project site is the Mission Valley Branch Library located at 2123 Fenton Parkway, in the eastern portion of Mission Valley, approximately 2.5 miles east of the project site. The library is 19,700 square feet in size and owns approximately 77,658 items (books, paperbacks, DVDs, CDs, etc.). The Mission Valley Branch Library provides library materials, reference, and children's services (programs, story hours, etc.), as well as meeting room space and a computer lab that provides public access to the internet.

2.4.4 School Services

Public school service would be provided by San Diego Unified School District. There are no public schools located within Mission Valley. The schools that would serve the project area are located in the adjacent communities of Serra Mesa and Kearny Mesa. Specifically, public schools serving the project area are Jones Elementary School, located in the Serra Mesa community at 2751 Greyling Drive; Taft Middle School, located in the Serra Mesa community at 9191 Gramercy Drive; and Kearny High Complex, located in the Kearny Mesa community at 7651 Wellington Way. There are three charter schools located in the project area: Audeo Charter School, located at

7510-7610 Hazard Center Drive in the Mission Valley community; Dehesa Charter School, located at 4646 Mission Gorge Place in the Navajo community; and San Diego Cooperative Charter School, located at 7260 Linda Vista Road in the Linda Vista community.

2.4.5 Recreation

The General Plan's *Recreation Element* addresses the preservation, protection, acquisition, development, operation, maintenance, and enhancement of public recreation opportunities and facilities throughout the City of San Diego for all users. Mission Valley contains two public recreational amenities, Sefton Field, which houses four little league fields and located approximately three miles west of the project site, Civita Park within the Civita development, located approximately one mile northeast of the project site. In addition, the San Diego River Park Master Plan area is located north of the project site beyond Camino de la Reina and existing development, along the San Diego River. Included as part of the San Diego River Park Master Plan is an integrated and connected multi-use trail system, which provides additional opportunities for access to and recreation along the San Diego River.

Several regional recreational amenities are located near the Mission Valley community. These include Balboa Park, Presidio Park, and Mission Bay Park. Balboa Park, located just north of downtown San Diego, approximately three miles south of the project site, encompasses more than 1,000 acres and includes open space areas, natural vegetation zones, green belts, gardens, walking paths, three off-leash dog parks, restrooms, and recreational facilities, such as tennis courts, swimming pool, lawn bowling, a golf course, and disc golf. In addition, Balboa Park contains 15 museums, several theaters, gift shops, restaurants, and the San Diego Zoo. Presidio Park is located three miles southwest of the project site in the Uptown community and contains open lawn for picnicking and play area, as well as restrooms and Junípero Serra Museum. Mission Bay Park, located five miles west of the project site, is the largest aquatic park of its kind in the country, consisting of over 4,600 acres in roughly equal parts land and water. Mission Bay has 27 miles of shoreline, 19 of which are sandy beaches with eight locations designated as official swimming areas. Mission Bay Park offers boat docks and launching facilities, sailboat and motor boat rentals, biking and walking paths, basketball courts, and playgrounds, as well as open lawn areas for picnicking and recreation. Public restrooms and showers are available and lifeguard stations are located in designated areas.

2.5 Planning Context

This section provides a brief overview of the planning context relevant to the proposed project. For a detailed discussion of land use, zoning, and planning policies and regulations that apply to the project site, see Section 5.1, *Land Use*.

2.5.1 City of San Diego General Plan

The City's General Plan sets forth a comprehensive, long-term plan that prescribes overall goals and policies for development within the City of San Diego. The General Plan contains the following Elements: Land Use and Community Planning; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; Noise; and Historic Preservation. While the Housing Element is an element of the City's General Plan, it is provided under separate cover from the rest of the General Plan due to the need for frequent Housing Element updates to facilitate compliance with the State reporting requirements. The General Plan identifies the project site as Commercial Employment, Retail, and Services (Figure 2-5, *City of San Diego General Plan Land Use Map*).

In December 2015, the City of San Diego adopted its Climate Action Plan (CAP). The CAP includes a municipal operations and community-wide greenhouse gas (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 Assembly Bill (AB) 32. The CAP sets forth common-sense strategies to achieve attainable greenhouse gas reduction targets and outlines the actions that City will undertake to achieve its proportional share of State GHG emission reductions.

The CAP is a plan for the reduction of GHG emissions in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP. In July 2016, the City of San Diego adopted the CAP Consistency Checklist (Checklist) to provide a streamlined review process for the analysis of potential GHG impacts from proposed new development.

See Section 5.5, *Greenhouse Gas Emissions*, for a detailed discussion of current legislation and regulations regarding climate change, the CAP, and an evaluation of the project's consistency with the Checklist.

2.5.2 Mission Valley Community Plan

The project site is governed by the Mission Valley Community Plan, which was adopted in 1985. The Mission Valley Community Plan area encompasses approximately 2,418 net acres. The community is a regional center of office, hotels, retail sales, and a growing residential community, tied together by the San Diego Trolley and the San Diego River. The Mission Valley Community Plan is currently undergoing an update process, which is scheduled to be completed in 2019.

According to the adopted Mission Valley Community Plan, the project site is designated as Commercial Retail (see Figure 2-6, *Mission Valley Community Plan Land Use Map*). The proposed project would be developed under the "Multiple Use Development Option" allowed in the Community Plan. A "Multiple Use Development Option" approach is intended to permit greater flexibility in project design than is possible through strict application of conventional zoning regulations. This option permits developers to combine land uses in such a way that community and individual project "self-containment" can be achieved. "Self-containment" means that all support facilities and services associated with a project are located either within the project or within a short walking distance. Examples of support facilities and services include banks, restaurants, health facilities, and food markets. "Self-containment" is intended to reduce the number of intra-Valley automobile trips, resulting in fuel conservation, decreased air pollution, and less traffic.

2.5.3 Zoning

Zoning for the Witt Mission Valley project site is governed by the City's Land Development Code (also known as the San Diego Municipal Code or SDMC); specifically, the Mission Valley Planned District Ordinance (MVPDO or simply PDO). Within the Mission Valley community, the project site is zoned MV-CR (Mission Valley – Commercial Retail) (see Figure 2-7, *Existing Zoning*). The purpose of the MV-CR zone is to primarily accommodate community- and regional-serving retail sales establishments. Developments within the Mission MV-CR zone may employ the Multiple Use Development Option of the Community Plan when there is:

- Two or more significant revenue-producing uses [such as retail, office, residential (either as rentals or condominiums), hotel/motel, and/or recreation] —which, in well-planned projects, are financially supportive of the other uses;
- Significant functional and physical integration of project components including uninterrupted pedestrian connections, if available, to adjacent developments;

- Development in conformance with a coherent plan (which frequently stipulates the type and scale of uses, permitted densities, and related items); and
- Public transit opportunities and commitments.

The MVPDO limits development intensity based on average daily traffic (ADT) and the geographic location of the project in Mission Valley, as well as Development Intensity District (DID) in which the project is located.

Development Intensity Thresholds guide the development application and review process depending on the amount of ADT resulting from a proposal.

Threshold 1 applies geographically in Mission Valley, with Area 1 located north of the centerline for I-8 and west of the centerline for SR 163, Area 2 located north of the centerline of I-8 and east of the centerline of SR 163, and Area 3 for the area generally located south of I-8. Projects that meet Threshold 1 criteria would be processed ministerially. For the Witt Mission Valley project site, which is located north of I-8 and east of SR 163 in area 2, the Threshold 1 criterion is no more than 140 ADT per gross acre, or a total of 718 ADT. Development of the project site would exceed this threshold.

Threshold 2 projects are those that require a discretionary Mission Valley Development Permit (Site Development Permit) and are based on ADT assigned to 13 different DIDs in Mission Valley: DIDs A through M. The project is located in DID G. According to Table 1514-03A in the MVPDO, up to 344 ADT per gross acre is allowed within Development Threshold 2. For the 5.13-acre project site, the MVPDO would allow up to 1,765 ADT. The proposed project would generate less than 1,765 ADT. Thus, the project is within Threshold 2's ADT limit, and a Site Development Permit is required for the project.

2.6 Regional Plans

This section provides a brief overview of the regional planning context relevant to the proposed project.

2.6.1 *Montgomery Field Airport Land Use Compatibility Plan*

The Witt Mission Valley project site is located within the Airport Influence Area (AIA) identified in the Airport Land Use Compatibility Plan (ALUCP) for Montgomery Field (January 2010) (Figure 2-8, *Montgomery Field ALUCP Airport Influence Area*). The City of San Diego implements the ALUCP policies and criteria with the Supplemental Development Regulations contain in the Airport Land Use Compatibility Overlay Zone (Chapter 13, Article 2, Division 15 of the City's Municipal Code). There are two Review Areas for Montgomery Field. The project site is located within Review Area 2. Review Area 2 involves airspace protection or overflight compatibility. See Section 5.10, *Health and Safety*, for a detailed discussion of project compatibility with the Montgomery Field ALUCP, and Section 5.1, *Land Use*, for a discussion of the project's relationship with the Montgomery Field ALUCP.

2.6.2 *San Diego International Airport, Airport Land Use Compatibility Plan*

The Witt Mission Valley project site is located within the AIA Review Area 2 identified in the ALUCP for San Diego International Airport (SDIA) (April 2014) (Figure 2-9, *San Diego International Airport ALUCP Airport Influence Area*). The basic function of the SDIA ALUCP (2014) is to promote compatibility between the airport and the land uses that surround it to the extent that these areas are not already devoted to incompatible land uses. The ALUCP safeguards the general welfare of the inhabitants within the vicinity of SDIA and the public in general. (See Section 5.1, *Land Use*, for a discussion of the project site's relationship with the SDIA ALUCP.) The ALUCP provides policies and criteria for the City of San Diego to implement and for the Airport Land Use Commission (ALUC) to use when

reviewing development proposals. See Section 5.10, *Health and Safety*, for a detailed discussion of project compatibility with the SDIA ALUCP.

2.6.3 San Diego River Park Master Plan

The San Diego River Park Master Plan (2013) provides the vision and guidance to restore the relationship between the San Diego River (River) and the surrounding communities by creating a River-long park, stretching from the Pacific Ocean at Ocean Beach Park to the City's jurisdictional eastern boundary at the City of Santee. The San Diego River Park Master Plan is the result of the grassroots community efforts in partnership with the City of San Diego.

The San Diego River Park Master Plan covers the 17.5-mile stretch of the San Diego River and includes two distinct planning areas: the River Corridor Area and the River Influence Area. The River Corridor Area consists of the 100-year floodway along both sides of the River, plus 35-foot path corridor on each side. The River Influence Area consists of the first 200 feet adjacent to the River Corridor Area, also on both sides of the River. The project site is located outside the River Influence Area and is separated from the San Diego River Park Master Plan area and San Diego River by multi-family residential development located north of the project site.

2.6.4 San Diego Regional Air Quality Strategy

The San Diego Regional Air Quality Strategy (RAQS) was developed to identify feasible emission control measures and provide expeditious progress toward attaining the State ozone standards. The two pollutants addressed in the RAQS are volatile organic compounds (VOC) and oxides of nitrogen (NOx), which are precursors to the formation of ozone. The San Diego County Air Pollution Control District (APCD) is responsible for RAQS development and implementation. See Section 5.4, *Air Quality*, for a complete analysis of project compliance with the RAQS.

2.6.5 San Diego Forward: The Regional Transportation Plan

San Diego Forward: The Regional Transportation Plan (Regional Plan or RTP) was adopted by San Diego Associated of Governments (SANDAG) on October 9, 2015. The RTP serves as a blueprint for how the San Diego region will grow and how SANDAG will invest in transportation infrastructure that will provide more choices, strengthen the economy, promote a healthy environment, and support thriving communities. The Regional Plan ensures that tax dollars will be spent for the greatest public good by providing a roadmap to grow and evolve and by prioritizing 35 years of regional transportation projects to create a framework for much of the region's transportation infrastructure. The transportation decisions detailed in the Regional Plan serve an overarching goal: create more transportation choices, which ultimately will lead to healthier communities, healthier people, and a healthier environment. In addition, the Regional Plan has been organized to include the following elements Policy Element, Sustainable Communities Strategy, Financial Element, and Action Element.

2.6.6 Water Quality Control Plan for the San Diego Basin

The San Diego Regional Water Quality Control Board's Water Quality Control Plan for the San Diego Basin (Basin Plan) 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. Additionally, the Basin Plan incorporates by reference all applicable State and Regional Board plans and policies. See Section 7.8, *Water Quality*, for a complete analysis of project compatibility with the applicable water quality control regulations.

2.6.7 Multiple Species Conservation Program Subarea Plan/Multi-Habitat Planning Area

In March 1997, the City of San Diego adopted the Multiple Species Conservation Program (MSCP) Subarea Plan, a comprehensive habitat conservation planning program for southwestern San Diego County. The MSCP preserves a network of habitat and open space, protecting biodiversity and enhancing the region's quality of life. An Implementing Agreement (IA) was signed in July 1997 between the City of San Diego, United States Fish and Wildlife Service (USFWS), and California Department of Fish and Wildlife (CDFW), which identified roles and responsibilities of the parties to implement the MSCP Subarea Plan. Based on the Subarea Plan and IA, the City of San Diego was granted authorization by the USFWS and the CDFW to approve projects that serve to implement the plan.

The Multi-Habitat Planning Area (MHPA) was developed by the City in cooperation with the wildlife agencies, property owners, developers, and environmental groups and delineates core biological resource areas and corridors targeted for open space conservation. Within the MHPA, limited development may occur. The MSCP Subarea Plan and implementing regulations provide development guidelines for areas within and adjacent to the MHPA. Section 1.4.3 of the City of San Diego MSCP Subarea Plan provides Land Use Adjacency Guidelines for development adjacent to the MHPA that addresses the proximity of drainage, lighting, noise, barriers, invasives, grading/land development, brush management, and toxins to the MHPA.

The Witt Mission Valley project site is located within the City's MSCP area, which covers 206,124 acres within the City's jurisdiction; however, the project site is not within the MHPA. The nearest MHPA area to the project site is the San Diego River, located approximately 255 feet north of the project site (Figure 2-10, *MHPA Exhibit*).

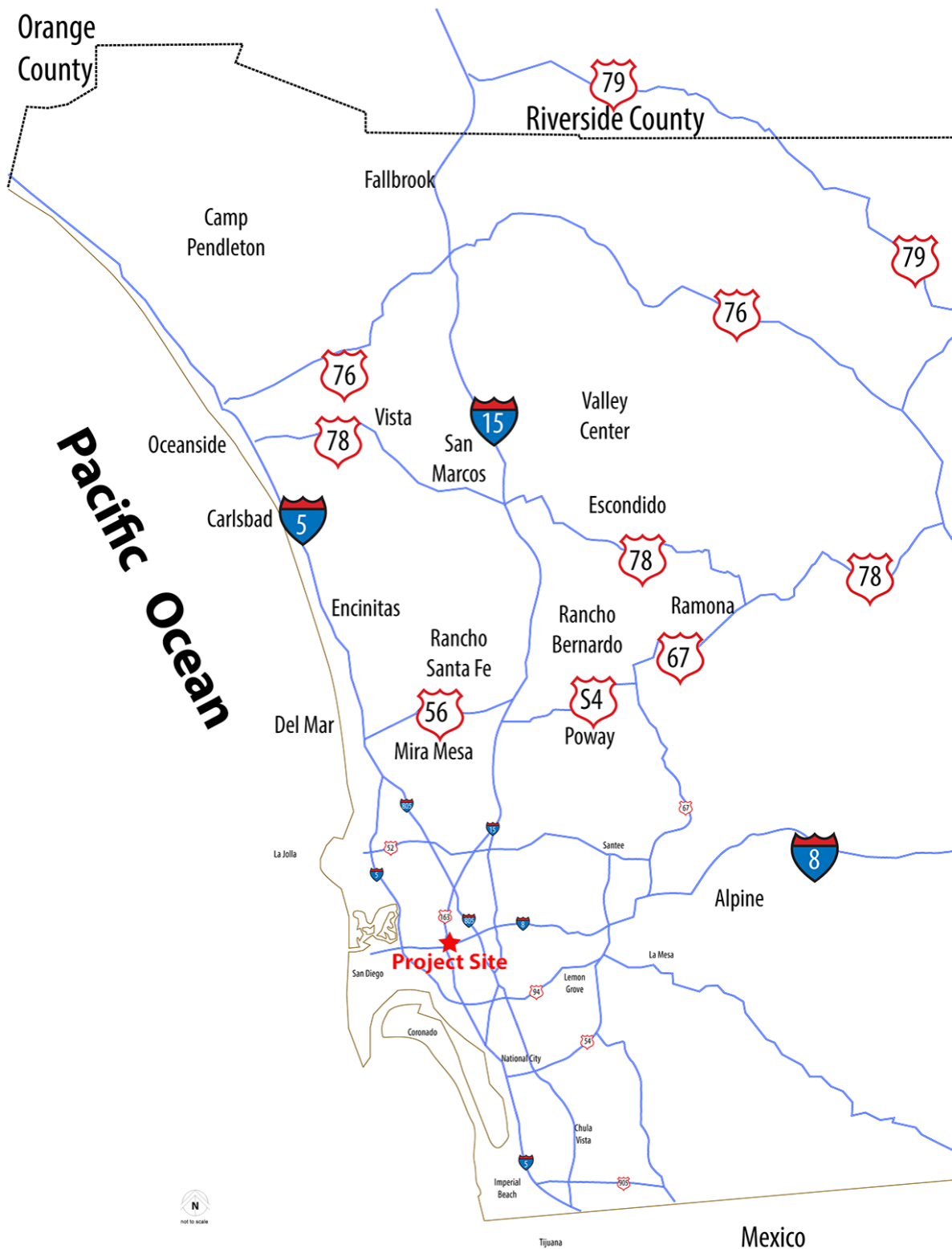


Figure 2-1. Regional Map

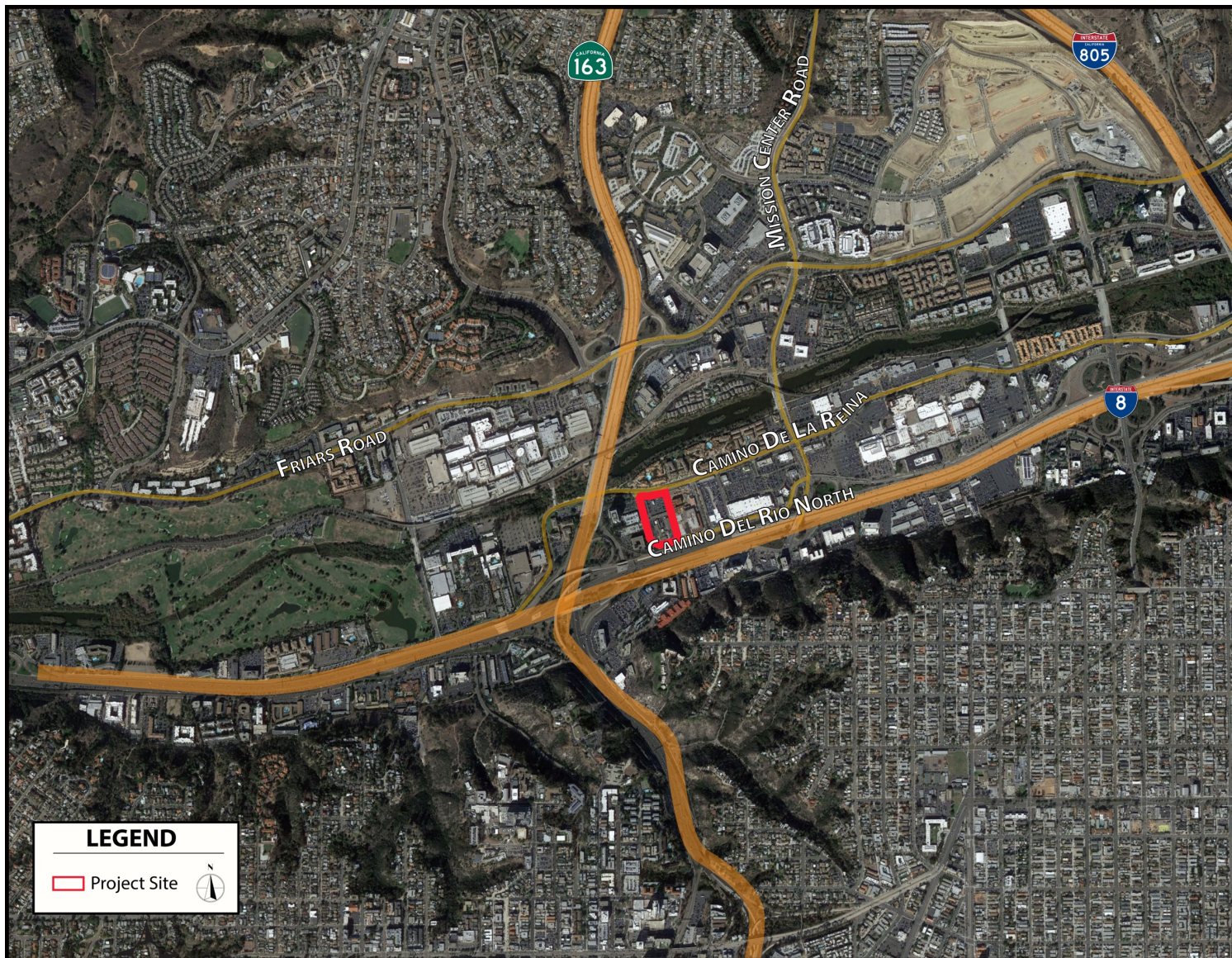


Figure 2-2. Vicinity Map

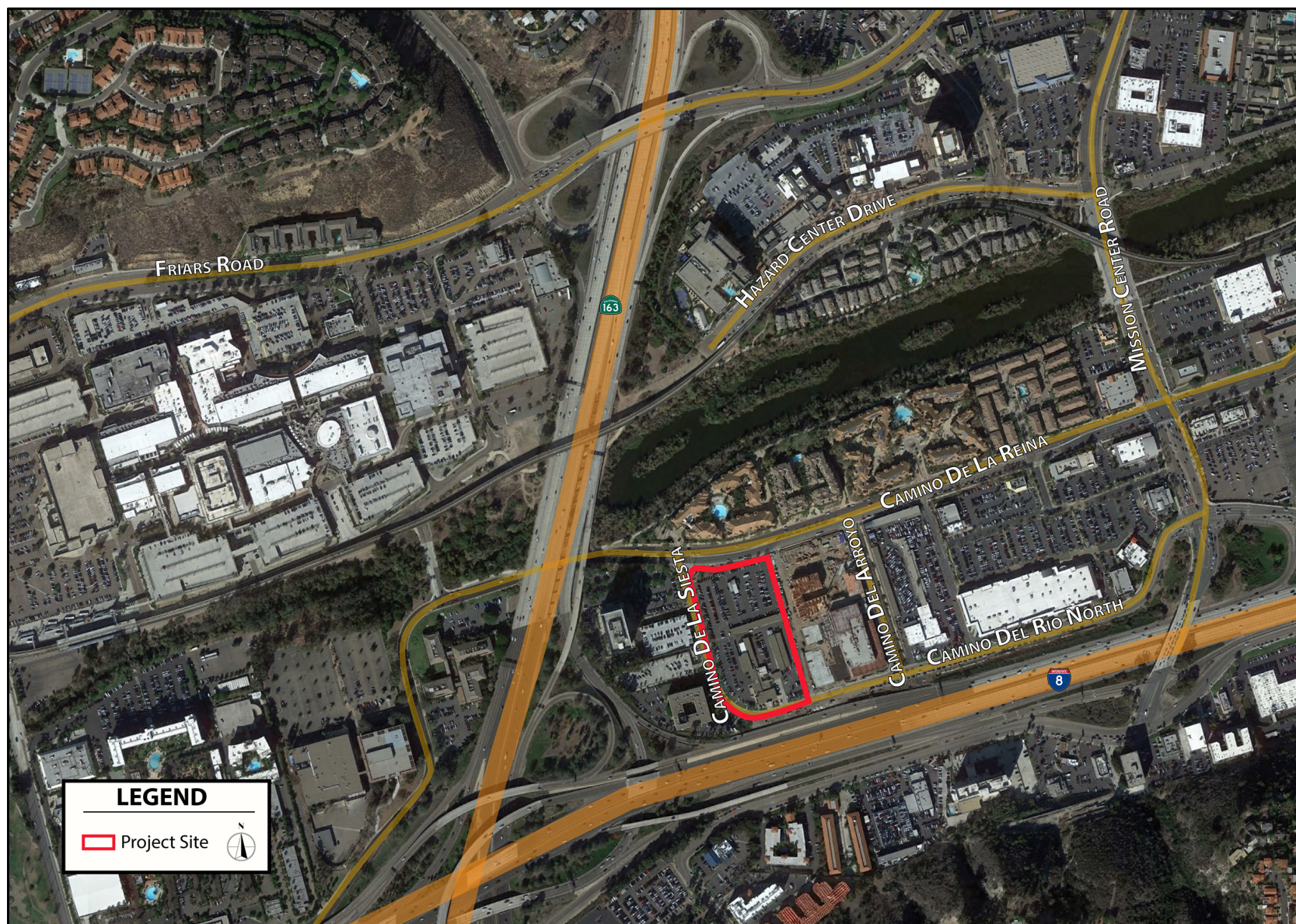
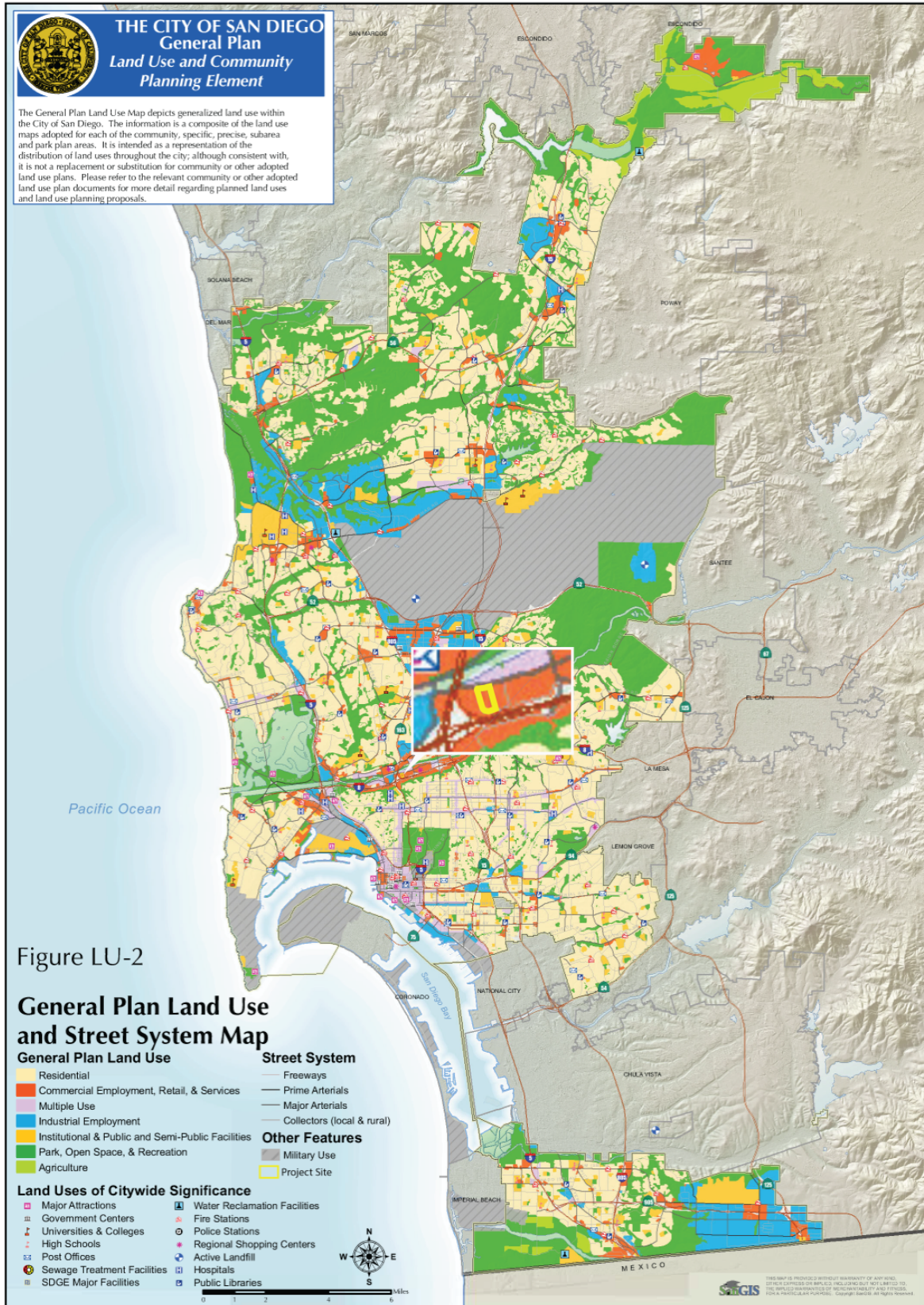


Figure 2-3. Project Location Map



Figure 2-4. Existing Site Conditions



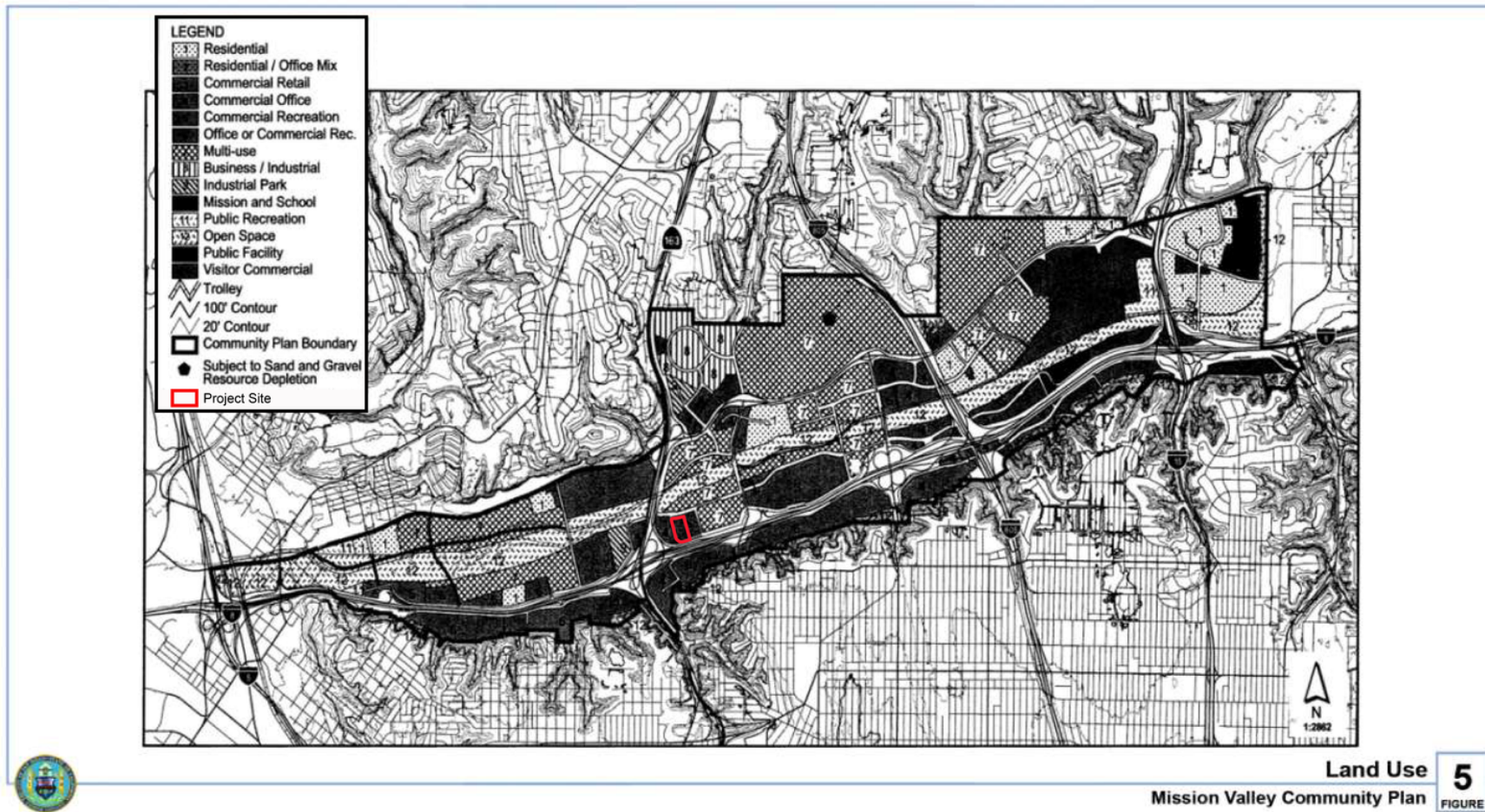


Figure 2-6. Mission Valley Community Land Use Map

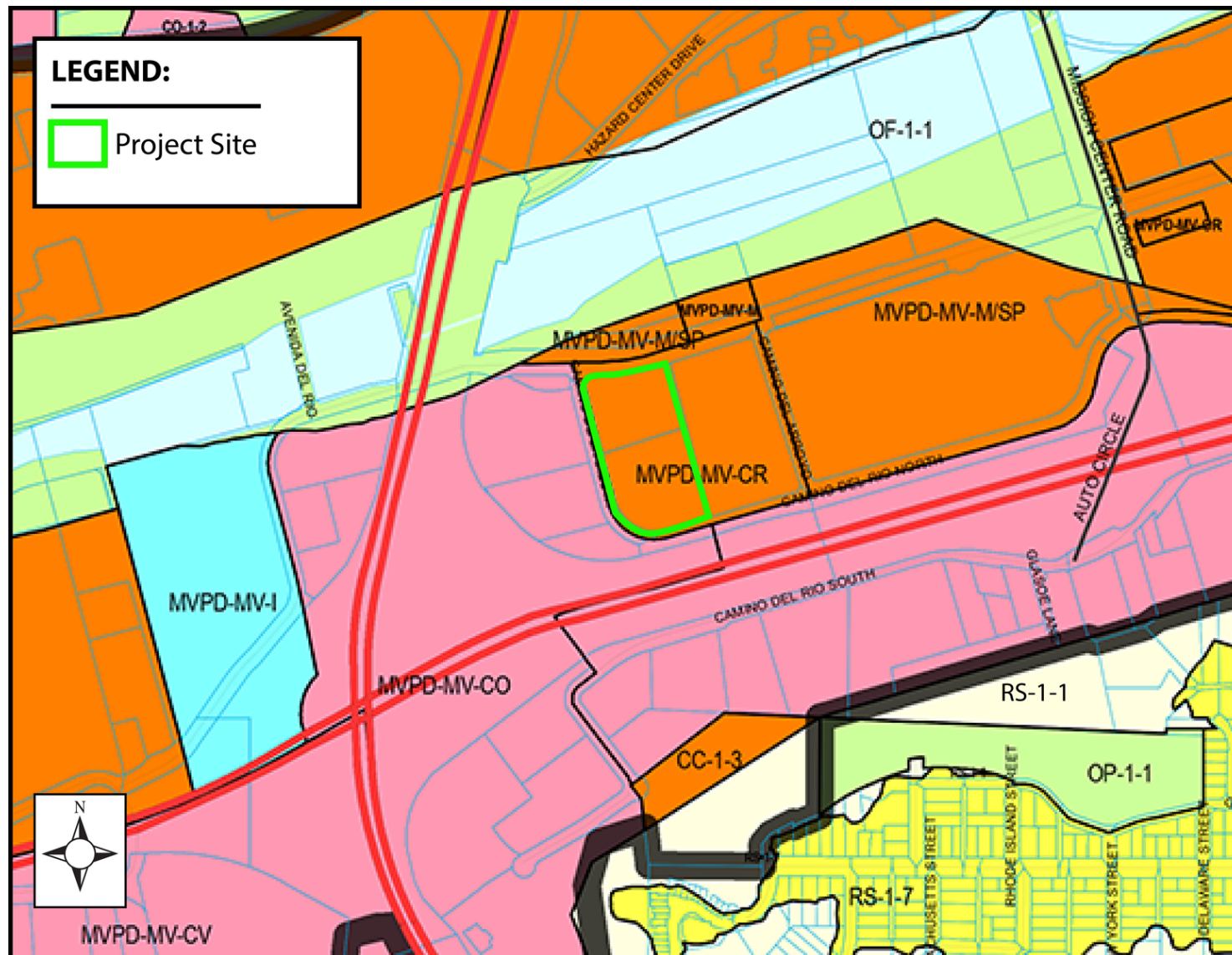


Figure 2-7. Existing Zoning

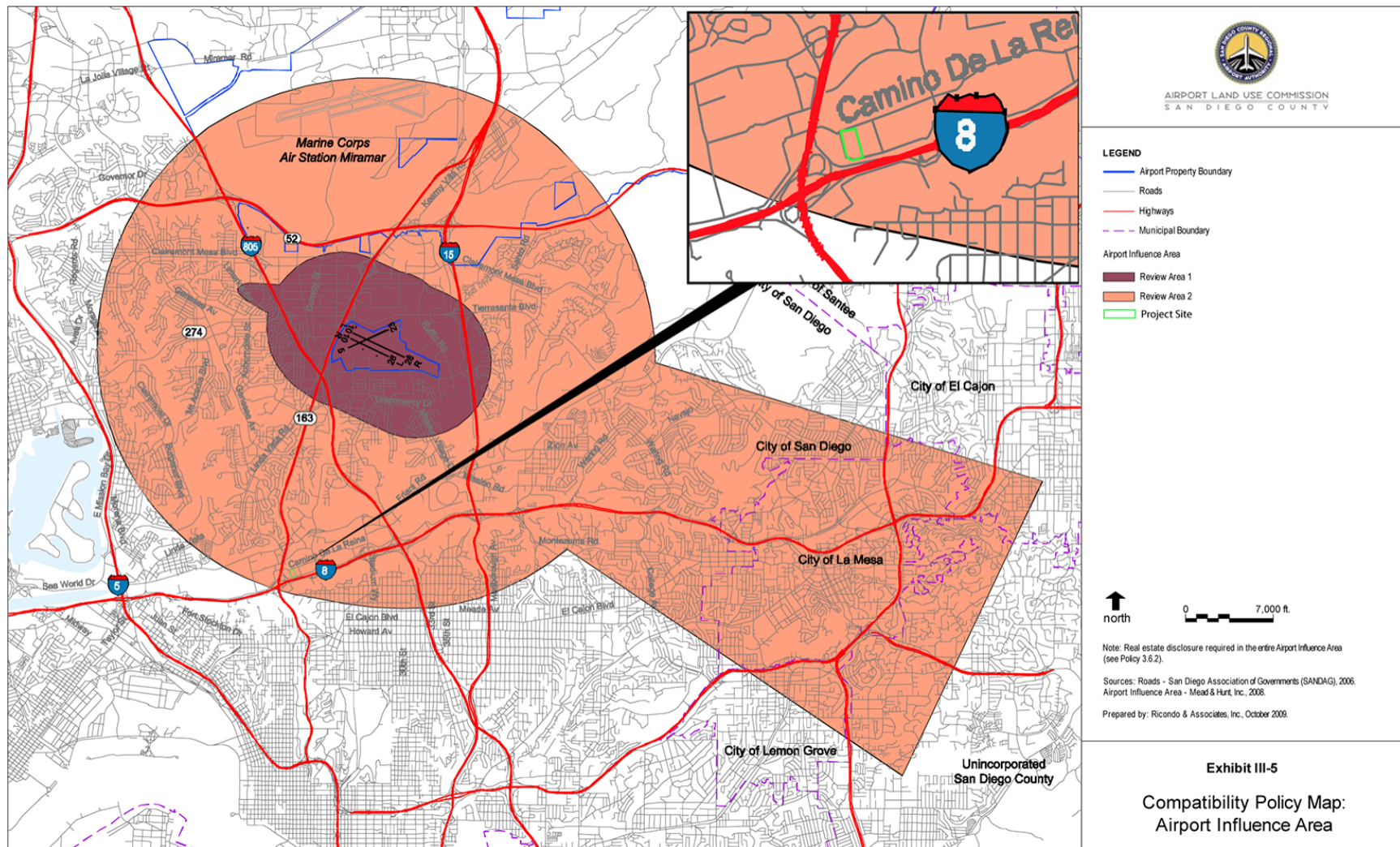


Figure 2-8. Montgomery Field ALUCP Airport Influence Area

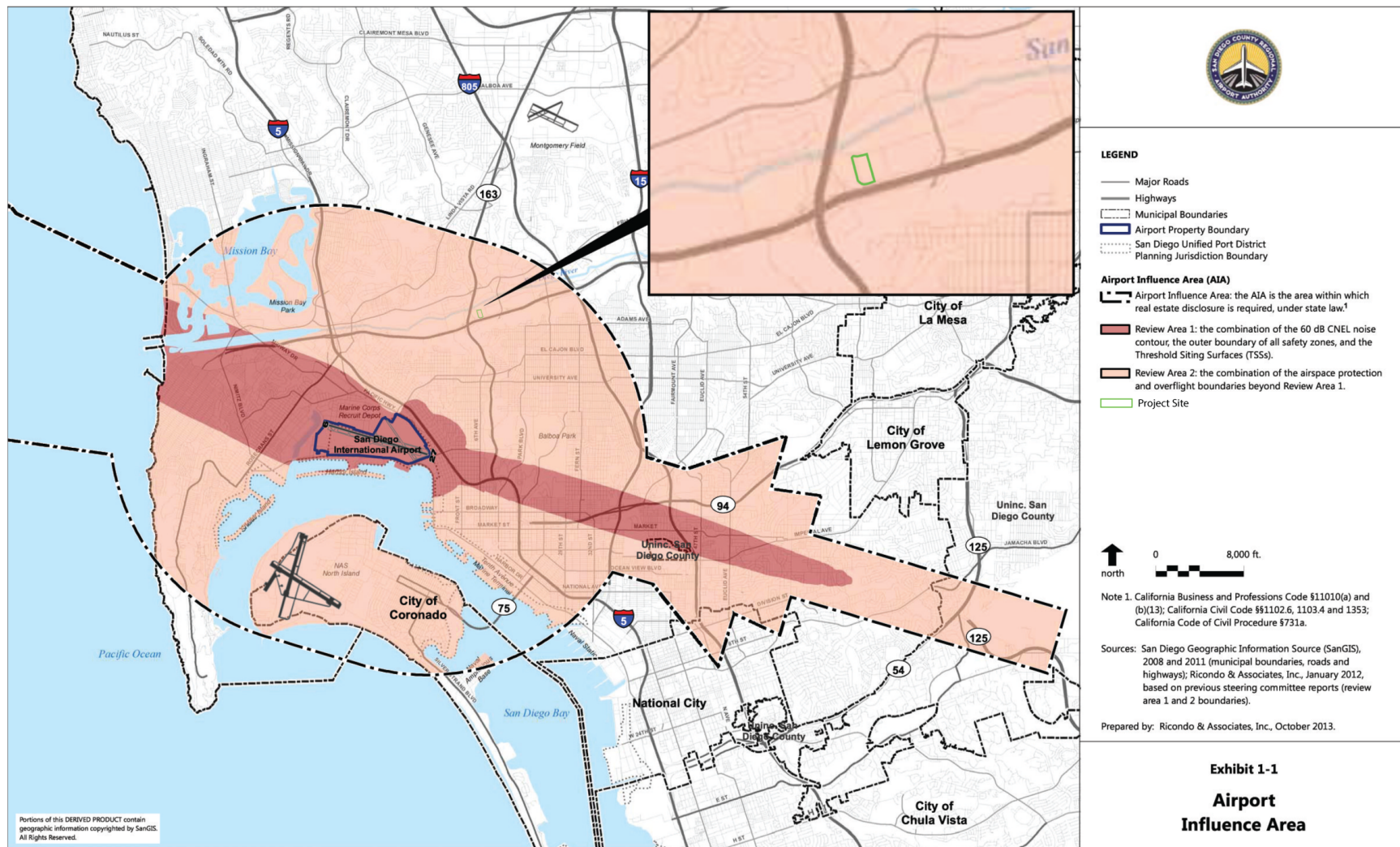


Figure 2-9. San Diego International Airport ALUCP Airport Influence Area

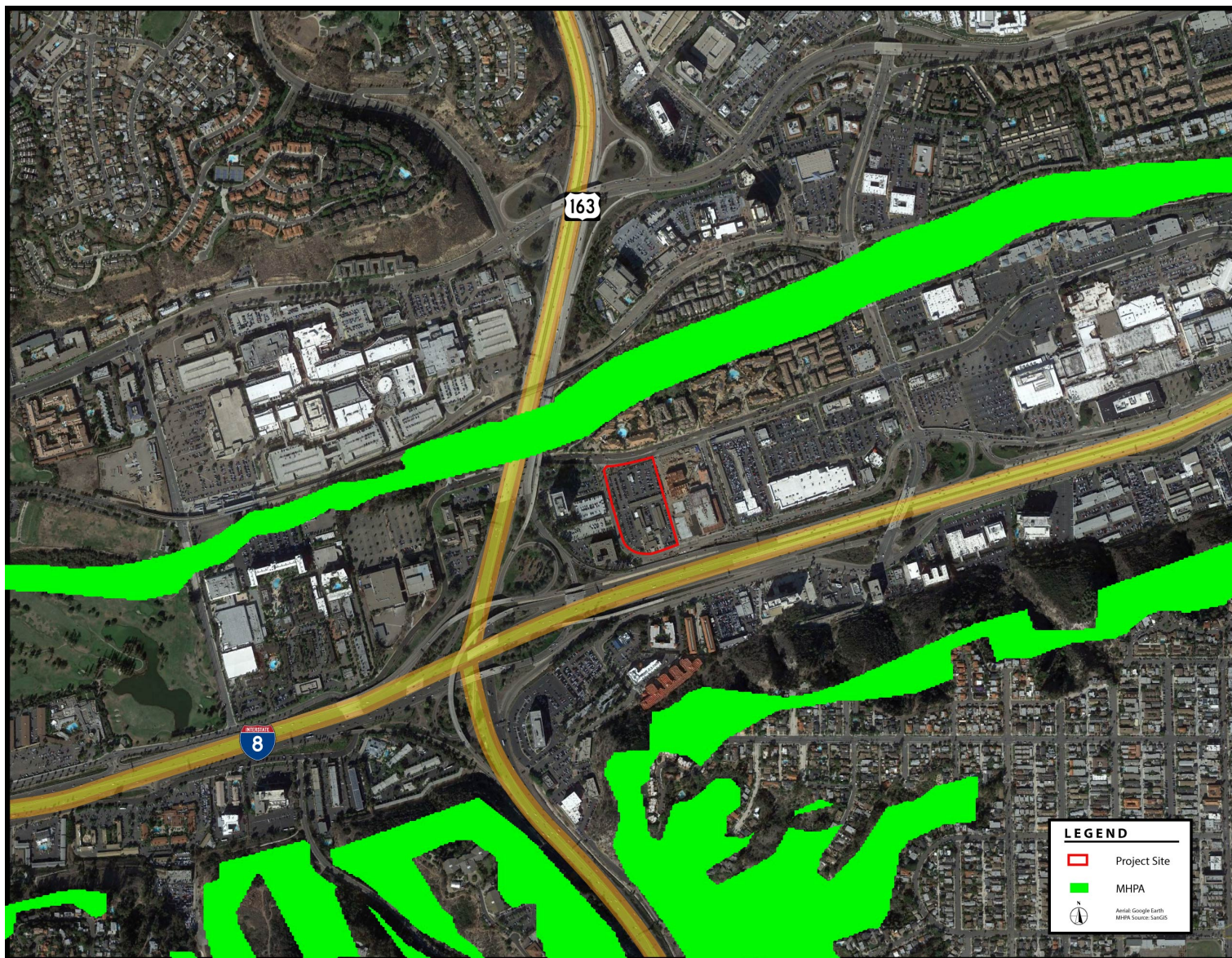


Figure 2-10. MHPA Exhibit

3.0 PROJECT DESCRIPTION

This EIR analyzes potential environmental effects associated with the proposed Witt Mission Valley project, located on 5.13 acres at 588 Camino del Rio North in the Mission Valley community, San Diego, California. The Witt Mission Valley project site is the location of current development in the form of existing commercial structures (38,070 square feet) used for automotive sales and service and on-site surface parking. Figure 2-4, *Existing Site Conditions*, shows the development that has occurred and the project site to date.

3.1 Purpose and Objectives of the Project

CEQA Guidelines require that the Project Description include a statement of the objectives sought by the project. 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 Purpose

The purpose of the project is to create a transit-oriented development with a mix of commercial retail, commercial office, residential, and shopkeeper uses that would serve the Mission Valley community. The project's location within a Transit Priority Area (TPA) and proposed uses provide in-fill mixed-use development in a location where all utilities and public services, as well as transit, are readily available. The project has been designed as a sustainable development, consistent with the requirements for United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) for Homes Silver Certification.

3.1.2 Project Objectives

The project objectives associated with the Witt Mission Valley project are as follows:

- Create a coherent and cohesive building site and site design that is compatible in scale and character of surrounding and planned developments and enhances the existing community character in the Mission Valley community.
- Implement a project that is sustainable based on the USGBC LEED for Homes Silver certification standards to reduce the project's overall carbon footprint, water and energy use, and generation of greenhouse gas emissions.
- In keeping with the City of Villages Strategy and Smart Growth policies, provide for a mix of commercial retail, commercial office, and residential uses as in-fill development of an underutilized site within an urban area where public facilities, transit, and services are readily available and easily accessed via alternative modes of travel, including mass transit and active transportation.
- Maximize efficiency in use of the project site.
- Enhance this portion of the Mission Valley community by contributing to a "Main Street" feel along Camino de la Reina, with buildings that address the street and open pedestrian areas that front on the Camino de la Reina.

- Create additional retail and job opportunities in the Mission Valley community.
- Utilize architecture and design elements to ensure high quality design and aesthetics.
- Provide retail amenities for the adjacent employment and residential uses that are not only within walking distance but also capture drive-by automobile trips and walk-up trips from adjacent properties, thereby reducing the amount of routine daily trips.
- Redevelop the project site to cluster high-density housing opportunities in the Mission Valley community where transit and other amenities are readily available.
- Provide common space that the public can access in the form of a pedestrian plaza.

3.2 Project Characteristics

3.2.1 Site Plan

The project involves demolition of existing structures (38,070 square feet) and on-site surface parking and construction of a mixed-use development consisting of residential, commercial retail, commercial office, and shopkeeper units. The project would range in height from one story to five stories, with a five-story parking garage, and would have a total of 267 residential units, 6,000 square feet of retail space, 3,600 square feet of commercial office, and 10 shopkeeper units (see Figure 3-1, *Witt Mission Valley Site Plan*).

Residential units for the project would be provided in a variety of forms. Studio, one-bedroom, and two-bedroom units would be provided, in addition to two-story, two-bedroom shopkeeper units. All units would have private outdoor space in the form of balconies or patios. Two courtyards and a two roof decks would be provided totaling 23,850 square feet. The largest courtyard would house a pool, aqua lounge, kids lounge, clubhouse, fitness center and fitness patio. A smaller courtyard would provide passive amenities for smaller gatherings. The two courtyards would be connected by way of an open corridor. Additionally, a dog park (5,400 square feet) would be located in the southwest corner of the project site for use by residents. In total, 50,050 square feet of residential amenity space would be provided.

The project would include a 20,800-square foot pedestrian plaza and gathering space located between commercial office and commercial retail buildings fronting Camino de la Reina and would provide a place for the public to gather and overflow/outdoor dining space for restaurant use. Colored concrete and enhanced paving would direct pedestrian circulation through the project site and to pedestrian gathering spaces. Decorative landscaping would be provided to enhance the pedestrian experience in these spaces.

The project would provide a total of 478 parking spaces, where 431 are required. A five-story, above ground parking structure would be situated at the center of the project site wrapped by the residential units to provide a total of 422 parking spaces. The balance of 56 parking spaces would be provided as surface parking. These surface parking spaces would be predominately for office and retail patrons; as such, the parking would be located internal to the project in the northern portion of the site adjacent to retail and office uses.

3.2.2 Architectural Design

As shown in Figures 3-2a through 3-2i, *Project Elevations*, the Witt Mission Valley project would feature architectural elements that are intended to provide identifiable features that would allow pedestrians and the motoring public to easily find their destinations. Architectural features such as varied building materials, heights, and setbacks would provide relief to building façades and would create focal points around the project for both pedestrians and arriving vehicles.

3.2.3 Vehicular and Pedestrian Access

Figure 3-3, *Access and Open Space Diagram*, illustrates the project's pedestrian and vehicular access plan. Access to the project site currently occurs from one driveway located on Camino de la Siesta and one driveway located on Camino del Rio North. The project proposes that primary vehicular access to the project would occur via a new driveway off Camino de la Siesta in the northwest portion of the project; an internal drive paralleling Camino de la Reina, which provides access to surface parking for leasing, patrons, and guests, the parking structure, and connects to adjacent Millennium Mission Valley; and an addition driveway off Camino de la Reina in the northeast corner of the project site. Direct entry to the parking structure would be provided from Camino del Rio North. A fire lane shared with the adjacent Millennium Mission Valley project would be provided along the eastern boundary of the project site.

Pedestrian movement would be accommodated throughout the project site, allowing pedestrians to easily move between the commercial and residential elements of the project via accentuated enhanced paving and signage. As shown in Figure 3-3, pedestrian access is provided along sidewalks on north, south, and western perimeters of the project site. Internal pedestrian access provides connections to buildings and the external sidewalks. Along the eastern portion of the project site, a shared fire lane would be provided.

3.2.4 Landscape Concept Plan

The proposed landscape plan (see Figure 3-4, *Landscape Planting Plan*) includes the use of naturalized and/or drought-tolerant plant material, whenever possible, appropriate for United States Department of Agriculture (USDA) Plant Hardiness Zone 10b. No invasive or potentially invasive species would be utilized. Planting is intended to function as a connecting device linking the various pieces of the project and design style. The landscape plan emphasizes a garden setting where plant material would be used to help define spaces, encourage circulation paths, highlight entry points, and provide softness and scale to the architecture.

Landscaping throughout the Witt Mission Valley project site is characterized by a diverse array of trees, shrubs, and accent planting. Evergreen, deciduous, and flowering trees are proposed throughout the project, such as California sycamore, coast live oak, and African sumac. Trees would be utilized to define spaces and create a sense of place. Street trees such as the New Zealand Christmas trees and fern pines along Camino de la Siesta, Camino de la Reina, and Camino del Rio North would enhance the pedestrian realm. Accent trees such as the crape myrtles or pink trumpet trees and palms would be located throughout the project, as well as plaza specimen trees such as the lemon scented tea tree and coast live oak within courtyards. Parking lot trees such as African sumac and Marina Madrone would provide shade and canopy for surface parking areas. The use of shrubs such as kangaroo paw, weavers bamboo, African iris, and star jasmine for screening and demarcation would be utilized, as well as California field sedge and green carpet natal plum for groundcover.

3.2.5 Grading Plan

The project site is located in Special Flood Zone AE of the San Diego River based on Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panel No. 06073C1618G, dated May 16, 2012. As a result, the minimum finished floor elevations of buildings proposed for the project are required to be two feet above the maximum water surface elevation adjacent to the project site. The majority of the project site would be elevated with fill to achieve the two feet above maximum water surface elevation.

The *Grading Plan* for the project is shown in Figure 3-5. The entire project site would be graded, involving 100 cubic yards of cut and 29,000 cubic yards of fill; approximately 28,900 cubic yards of material would be imported for the grading operation. Maximum depth of cut would be eight feet. Maximum depth of fill would be two feet. Approximately 3,900 feet of retaining and planter walls are proposed for the project along Camino de la Reina and Camino de la Siesta; the maximum height of walls would be approximately eight feet.

The project would be constructed in a single phase and construction is estimated to begin in 2019. Demolition and construction would occur over an approximate 24- to 26-month period.

3.3 Discretionary Actions

This EIR is intended to provide environmental documentation pursuant to CEQA to evaluate the potential environmental effects associated with the project. As such, it covers all discretionary permits proposed as part of the project. The discretionary approvals are summarized below.

Site Development Permit – Site Development Permit (SDP) is required to allow for the development of the project in accordance with Threshold 2 of the MVPDO and for development within the Mission Valley Planned District that includes above-grade structural parking.

Planned Development Permit – A Planned Development Permit (PDP) is required for the proposed development in order to implement the Multiple Use Development Option in the Mission Valley Community Plan. The project is located in the Mission Valley Community Plan area and is governed by the MVPDO, which identifies the zone for the project site as MV-CR. The PDP would allow for the development of a project with multiple uses that are not allowed within the underlying zone. A PDP would also allow for a deviations from the development regulations pertaining to structural lot coverage; sidewalk widths on Camino de la Reina, Camino del Rio North and Camino de la Siesta; and the parkway widths on Camino de la Reina. (Deviations, which include lot coverage, sidewalk width, and parkway width deviation is, are discussed in Section 5.1, *Land Use*.)

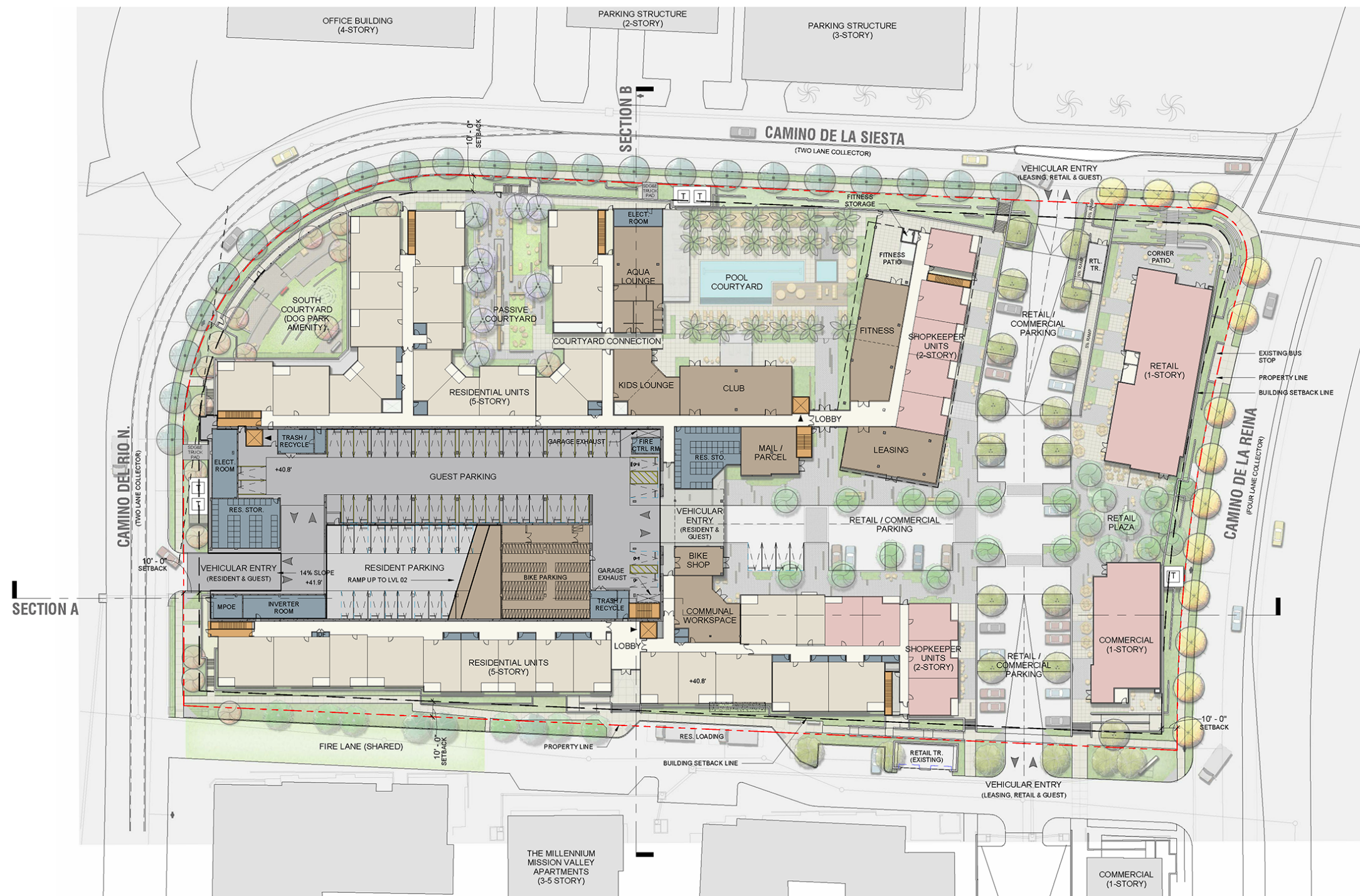


Figure 3-1. Witt Mission Valley Site Plan

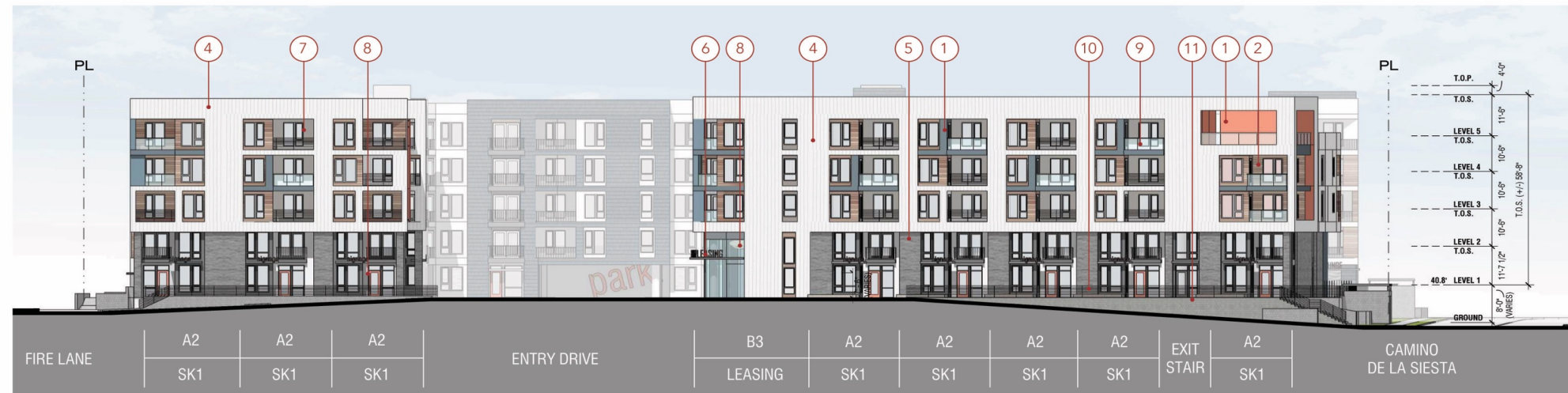
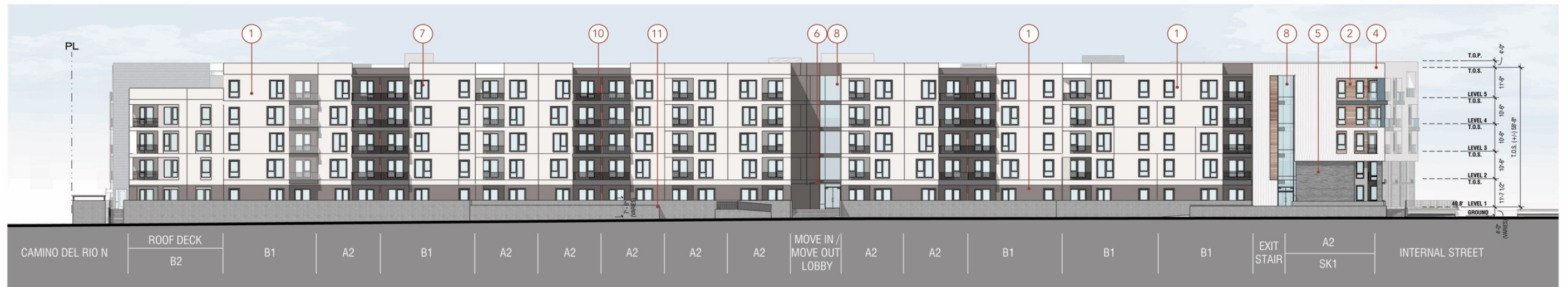


Figure 3-2a. Project Elevations – North Elevation and Perspective

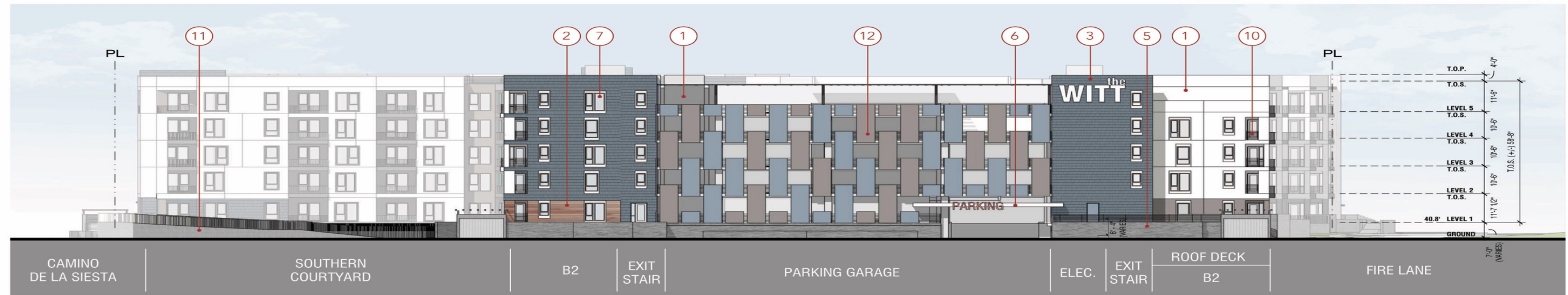


1) EAST ELEVATION



2) VIEW LOOKING DOWN FIRE LANE

Figure 3-2b. Project Elevations – East Elevation and Perspective

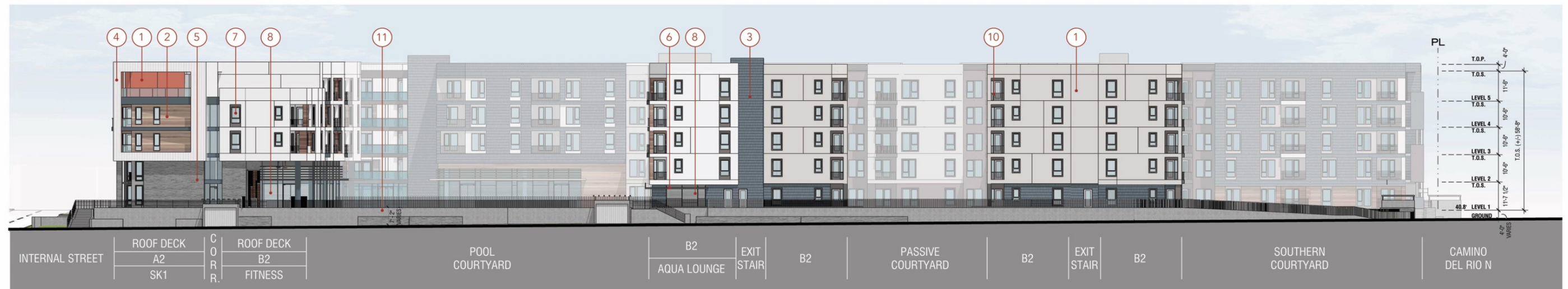


1) SOUTH ELEVATION



2) VIEW LOOKING AT SOUTH COURTYARD

Figure 3-2c. Project Elevations – South Elevation and Perspective



1) WEST ELEVATION

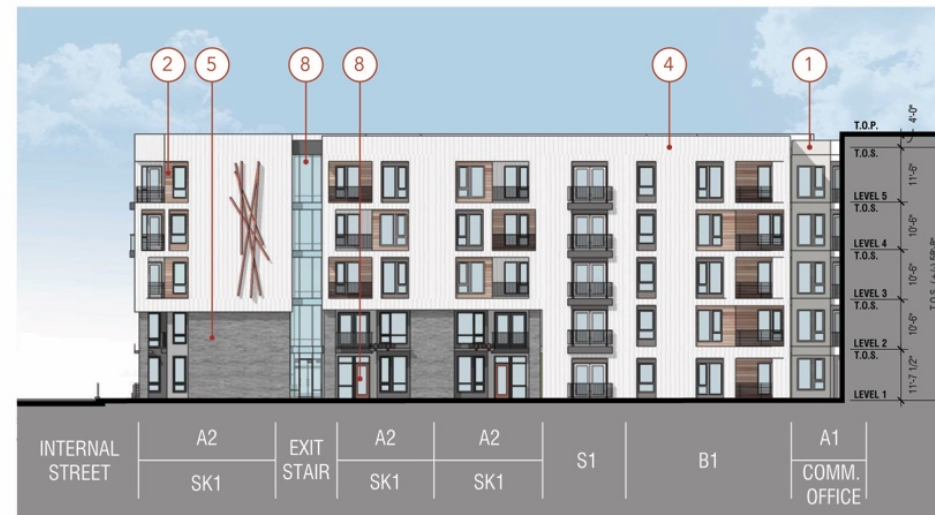


2) VIEW LOOKING NORTH AT CAMINO DE LA SIESTA FACADE

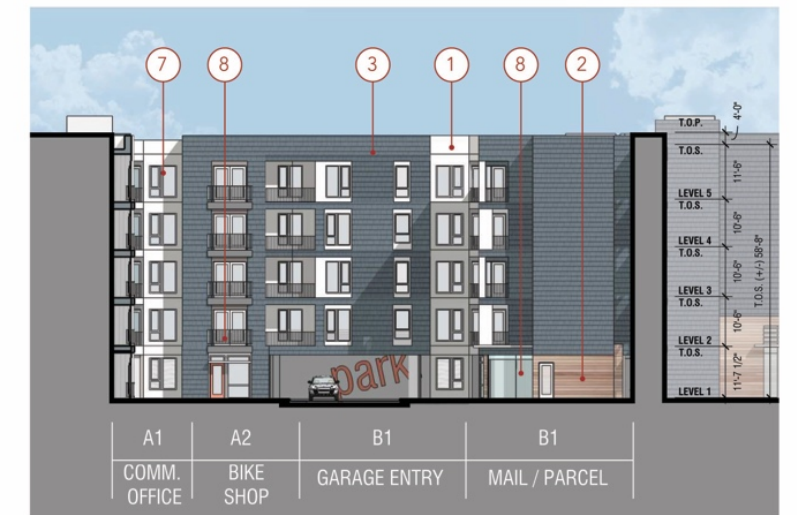
**Figure 3-2d. Project Elevations –
West Elevation and Perspective**



1) ELEVATION A



2) ELEVATION B



3) ELEVATION C

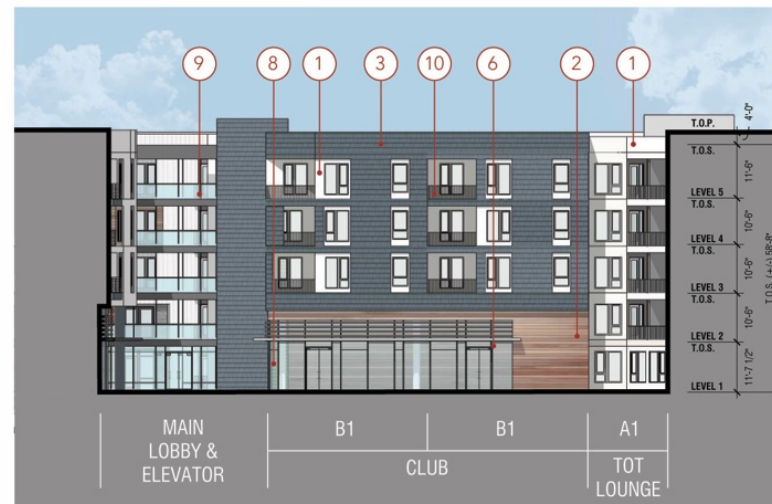


4) VIEW LOOKING SOUTH AT ENTRY COURTYARD

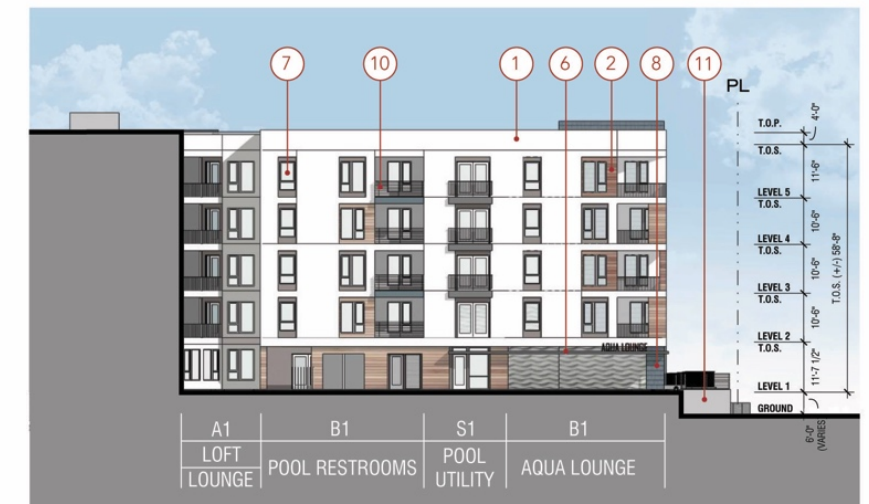
Figure 3-2e. Project Elevations – Entry Drive Elevations and Perspective



1) ELEVATION A



2) ELEVATION B



3) ELEVATION C



4) VIEW LOOKING EAST AT POOL COURTYARD

Figure 3-2f. Project Elevations – Pool Courtyard Elevations and Perspective



1) ELEVATION A



2) ELEVATION B



3) ELEVATION C



4) VIEW LOOKING EAST AT GARDEN COURTYARD

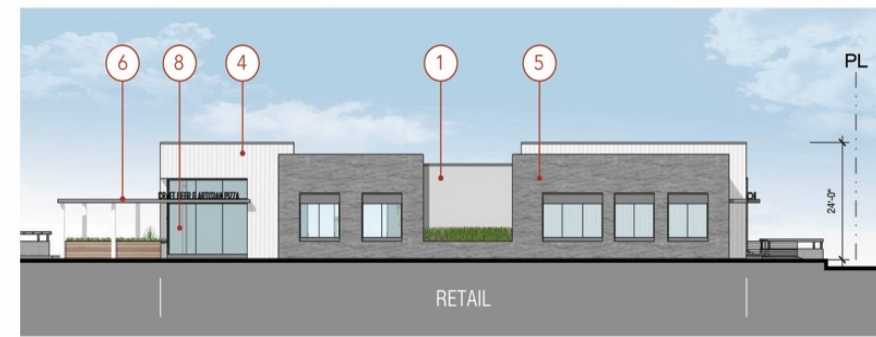
Figure 3-2g. Project Elevations – Passive Courtyard Elevations and Perspective



1) SOUTH ELEVATION



2) WEST ELEVATION



3) NORTH ELEVATION



4) EAST ELEVATION



5) VIEW LOOKING WEST AT RETAIL BUILDING

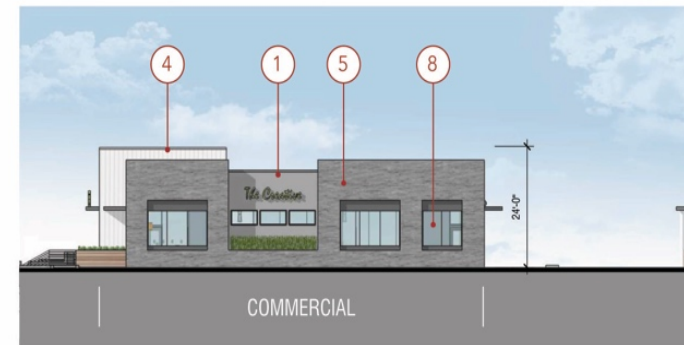
**Figure 3-2h. Project Elevations – Retail
Building Elevations and Perspective**



1) SOUTH ELEVATION



2) WEST ELEVATION



3) NORTH ELEVATION



4) EAST ELEVATION



5) VIEW LOOKING NORTH AT COMMERCIAL BUILDING

Figure 3-2i. Project Elevations – Commercial Building Elevations and Perspective

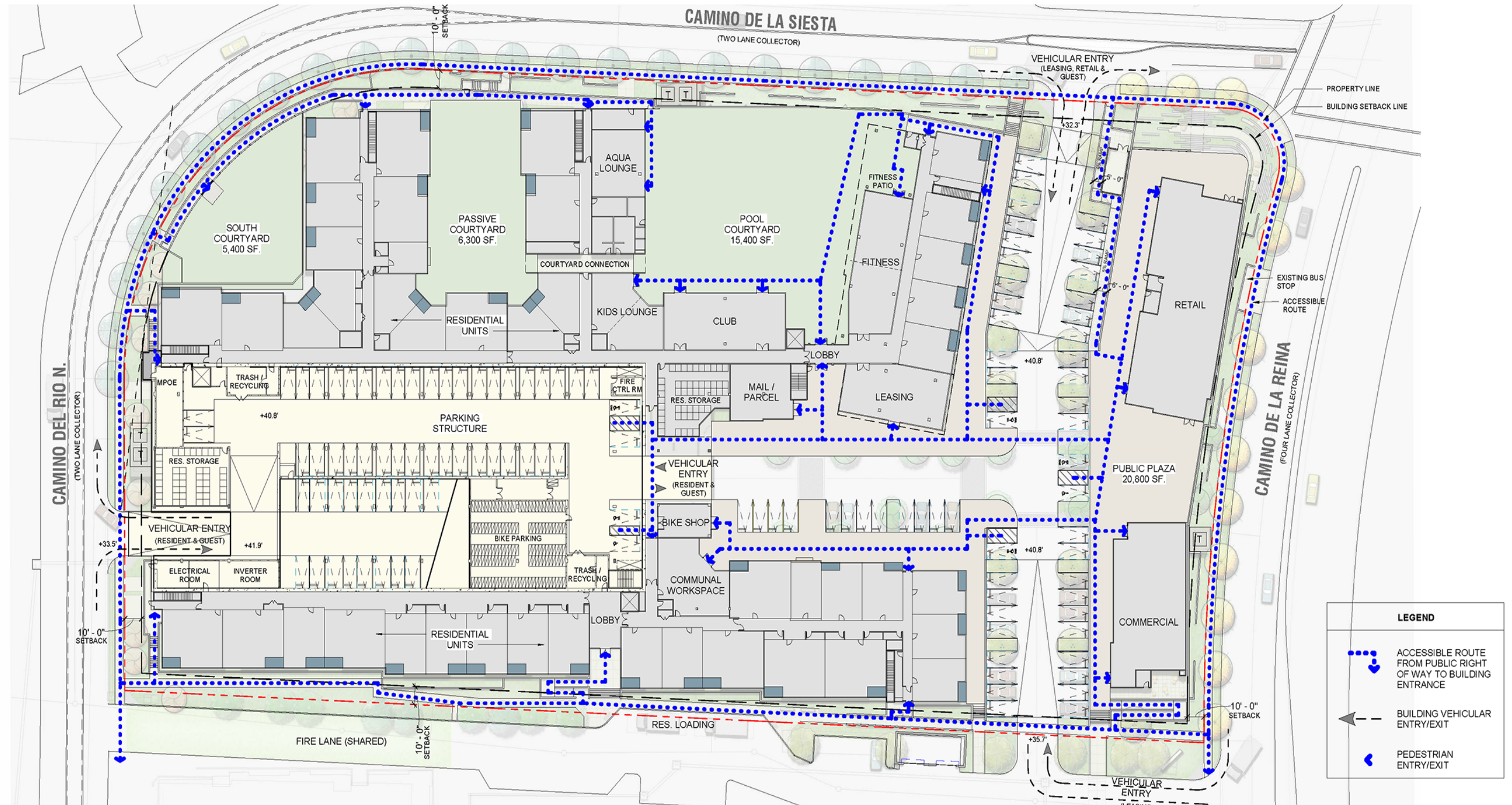


Figure 3-3. Access and Open Space Diagram

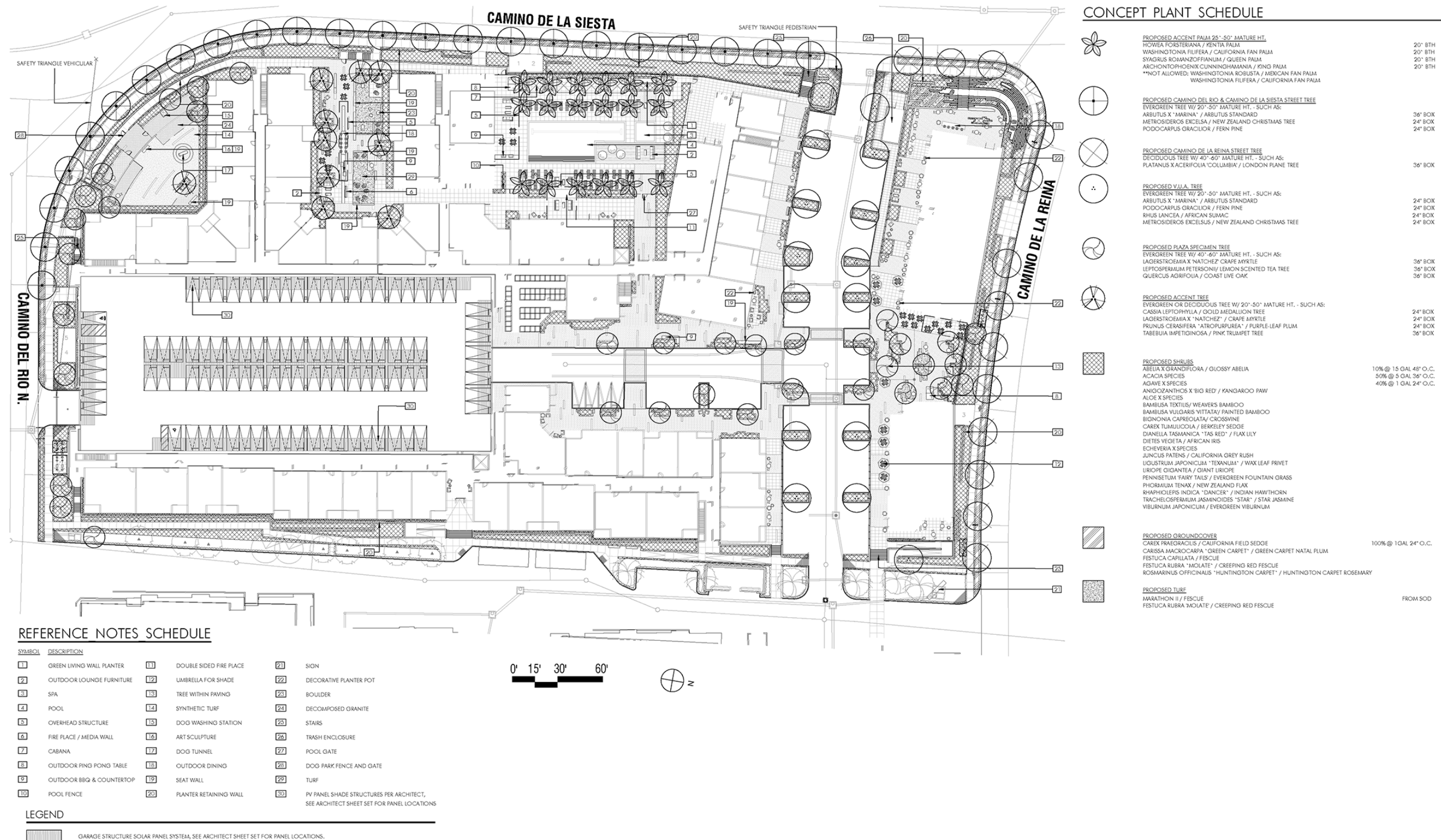
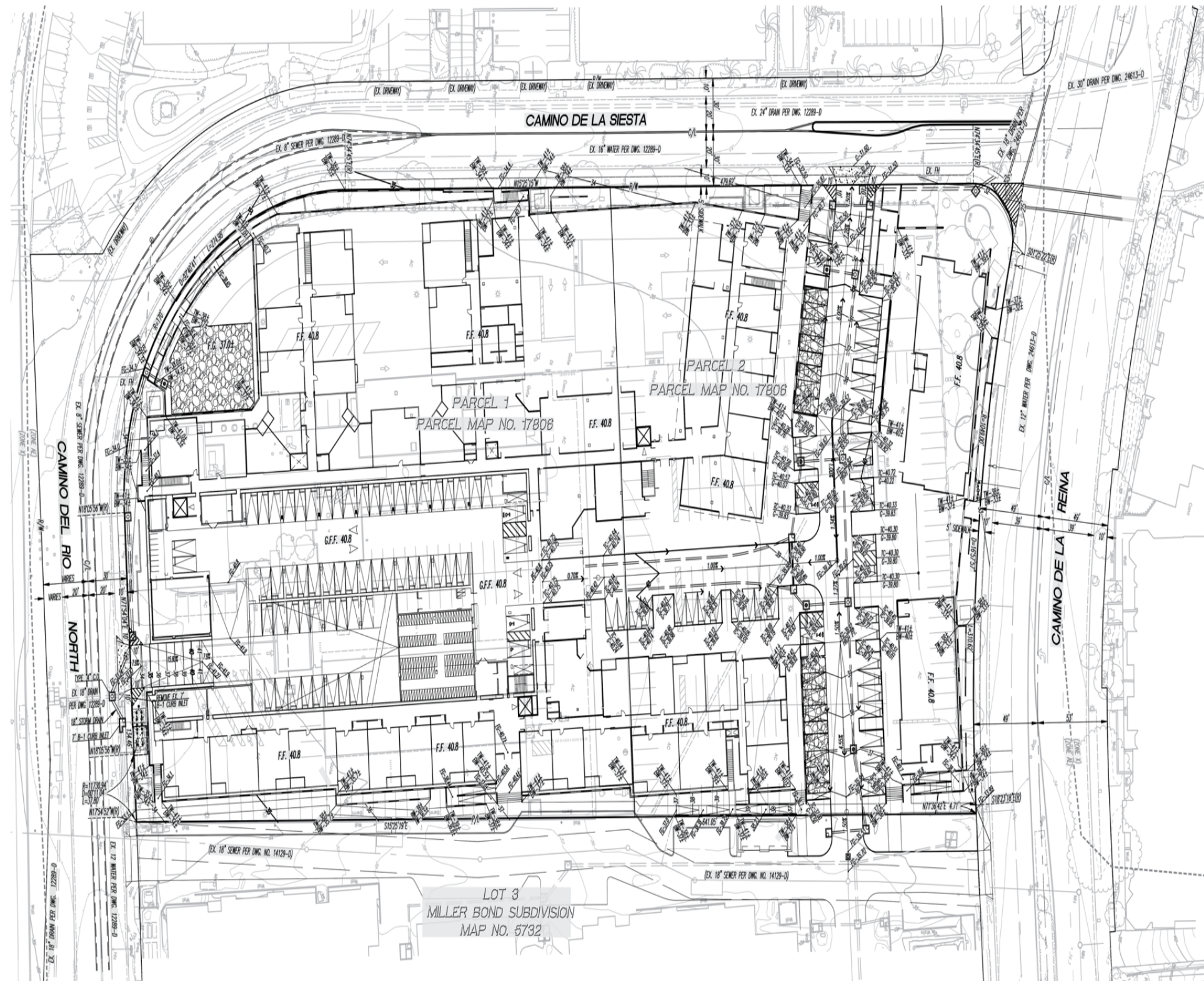


Figure 3-4. Landscape Planting Plan



LEGEND	STD. DWG.	SYMBOL
PROPERTY BOUNDARY		— P/L —
RIGHT OF WAY		— R/W —
EXISTING CONTOURS		— 30 —
EXISTING STORM DRAIN		— — — — —
EXISTING CURB INLET		□
EXISTING CLEAN OUT		□
PROPOSED CONTOURS		— 30 —
PROPOSED CURB INLET	(SDD-116)	□
PROPOSED CLEAN OUT	(SDD-115)	□
PRE-TREATMENT/BYPASS STRUCTURE	(PRIVATE)	□
PROPOSED STORM DRAIN	(SDD-110)	— — — — —
INFILTRATION AREA		▨
FLOOD HAZARD LIMITS		— (ZONE AE) — — (ZONE X) —
FINISHED GRADE		FG.
FINISHED FLOOR		F.F.
GARAGE FINISHED FLOOR		G.F.F.
TOP OF WALL ELEVATION		T.W.
FINISHED GRADE AT BOTTOM OF WALL		B.W.
PROPOSED RETAINING/PLANTER WALL		— — — — —
DIRECTION OF OVERLAND FLOW		→
SITE VISIBILITY AREA (SEE GENERAL NOTE NO. 4)		▨

Figure 3-5. Grading Plan

4.0 HISTORY OF PROJECT CHANGES

The section chronicles the changes that have been made to the project in response to environmental concerns raised during the City's review of the project.

During review of the project, the project submittal was revised to respond to comments raised by City staff associated with proposed residential units adjacent to the I-8 freeway. Specifically:

- The Site Plan was revised to relocate 20 residential units that had faced the I-8 freeway to interior to the project in order to minimize the number of units exposed to freeway noise. (All residential units along I-8 would include structural noise attenuation such that interior noise levels meet City requirements.)
- Relocating units from the portion of the project site that faces I-8 to the project's interior allowed for an expanded interior courtyard, providing an enhanced living experience for those residents.
- The parking structure was moved closer to I-8 to provide a better noise buffer to residential units. Further, the parking structure is architecturally articulated to provide an attractive façade that blends with the overall project.
- Balconies were removed or re-oriented from residential units along I-8, where noise levels exceed City standards. The project would provide useable and common open space elsewhere on the project site in excess of City requirements.

5.0 ENVIRONMENTAL ANALYSIS

The following sections analyze the potential environmental impacts that may occur as a result of project implementation. Issue areas subject to detailed analysis include those that were identified by the City of San Diego as potentially causing significant environmental impacts through the initial study and scoping process and issues which were identified in response to the NOP and the public scoping meeting as having potentially significant impacts. The NOP and letters submitted in response to the NOP are included in Appendix A. The following environmental issues are addressed in this Section:

- Land Use
- Transportation/Circulation
- Visual Effects and Neighborhood Character
- Air Quality
- Greenhouse Gas Emissions
- Energy
- Noise
- Historical Resources
- Tribal Cultural Resources
- Health and Safety
- Public Services and Facilities
- Public Utilities

5.1 Land Use

The following section discusses land use regulations and policies that are applicable to the project. This section references planning and environmental information contained in other sections of this EIR, as applicable.

5.1.1 Existing Conditions

The project site is developed with the Witt Lincoln car dealership and associated parking, vehicle storage, and maintenance areas. The site is designated as Commercial Employment, Retail, and Services in the City of San Diego General Plan and Commercial Retail in the Mission Valley Community Plan. The project site is zoned MV-CR (Mission Valley – Commercial Retail) and is within the Mission Valley Planned District Ordinance.

Multi-family residential developments are located north of the project site, beyond which is the San Diego River. The Millennium Mission Valley mixed-use project is under construction to the east of the project site. Farther east of the project site, beyond the Millennium Mission Valley project, is an automotive dealership and Westfield Mission Valley West shopping center, which provides a mix of commercial and restaurant establishments. West of the project site, across Camino de la Siesta, is a four-story commercial office building and a 12-story commercial office building with a mixture of surface and structured parking. Farther west of the project site, beyond the commercial office buildings, is State Route 163 (SR 163).

5.1.2 Regulatory Framework

The planning context of the *Environmental Setting*, Section 2.0 of this EIR, describes the land use plans and development regulations that apply to the development of the project. The following provides a brief recount or expansion of the planning context's discussion of selected plans and development regulations, including the City's General Plan, CAP, the Mission Valley Community Plan, the City's Land Development Code, MSCP Subarea Plan, and the Montgomery Field and San Diego International Airport ALUCPs. A discussion of the project's compatibility with these plans is provided in Section 5.1.3, *Impact Analysis*.

City of San Diego General Plan

The City of San Diego's General Plan sets forth a long-term plan for development within the City of San Diego. The General Plan guides development and addresses State requirements through the following ten Elements: Land Use and Community Planning; Mobility; Economic Prosperity; Public Facilities, Services, and Safety; Urban Design; Recreation; Historic Preservation; Conservation; Noise; and Housing. (The Housing Element was adopted March 2013 and is printed under separate cover from the General Plan.) As presented in Section 2.0, *Environmental Setting*, and depicted in Figure 2-5, *City of San Diego General Plan Land Use Map*, the project site is identified as Commercial Employment, Retail, and Services in the General Plan. The relevancy of the General Plan's elements pertinent to the Witt Mission Valley project is discussed below in greater detail.

The *Land Use and Community Planning Element (Land Use Element)* of the General Plan guides future growth and development into a sustainable Citywide development pattern while maintaining or enhancing the quality of life. This element provides policies to implement the City of Villages Strategy and establishes a framework to guide and govern the preparation of community plans tailored to each community. The relevant goals and policies of the Land Use Element for the Witt Mission Valley project are as follows:

Balanced Communities and Equitable Development

- Ensure diverse and balanced neighborhoods and communities with housing available for households of all income levels.

- *LU-H.1.d.* Ensure that neighborhood development and redevelopment addresses the needs of older people, particularly those disadvantaged by age, disability, or poverty.
- *LU-H.4.* Strive for balanced commercial development.
- *LU-H.4.c.* Ensure that commercial districts are balanced and do not exclude the retail, employment and service needs of local residents.
- *LU-H.4.d.* Encourage local employment within new developments and provide entrepreneurial opportunities for local residents.
- *LU-H.6.* Provide linkages among employment sites, housing, and villages via an integrated transit system and a well-defined pedestrian and bicycle network.
- *LU-H.7.* Provide a variety of different types of land uses within a community in order to offer opportunities for a diverse mix of uses and to help create a balance of land uses within a community.

City of Villages Strategy

The City of Villages Strategy is to focus growth into mixed-use activity centers that are pedestrian-friendly, centers of community, and linked to the regional transit system. The strategy draws upon the strengths of San Diego's natural environment, neighborhoods, commercial centers, institutions, and employment centers and focuses on the long-term economic, environmental, and social health of the City and its many communities. The City of Villages Strategy recognizes the value of San Diego's distinctive neighborhoods and open spaces that together form the City as a whole. Implementation of the City of Villages Strategy is an important component of the City's commitment to reduce local contributions to greenhouse gas emissions, because the strategy makes it possible for larger numbers of people to make fewer and shorter automobile trips. The following relevant goal and policy applies to the Witt Mission Valley project:

- Mixed-use villages located throughout the City and connected by high quality transit.
- *LU-A.7.b.* Achieve transit-supportive density and design, where such density can be adequately served by public facilities and services.
- *LU-A.10.* Design infill projects along transit corridors to enhance or maintain a "Main Street" character through attention to site and building design, land use mix, housing opportunities, and streetscape improvements.

The City of San Diego has determined the "village propensity" for all areas within City jurisdiction. Village propensity is determined by analyzing an array of factors, which include Community Plan-identified capacity for growth, existing or an identified funding source for public facilities, existing or an identified funding source for transit service, community character, and environmental constraints. These factors are mapped and overlaid upon each other to illustrate areas that already exhibit village characteristics and areas that may have a propensity to develop as village areas. According to the *City of San Diego General Plan Village Propensity Map* (Figure 5.1-1), the project site has a high village propensity.

The *Mobility Element* of the General Plan provides the framework to improve mobility through development of a balanced, multi-modal transportation network that is efficient and minimizes environmental and neighborhood impacts. It is closely linked to the Land Use and Community Planning Element and the City of Villages Strategy. Project-relevant policies contained within the Mobility Element address the need to improve walkability and the bicycle network, increase transit use, improve performance and efficiency of the street and freeway system, and provide sufficient parking facilities. Specifically, the following goals and policies apply to the Witt Mission Valley project:

Walkable Communities

- A city where walking is a viable travel choice, particularly for trips of less than one-half mile.
- A safe and comfortable pedestrian environment.
- A complete, functional, and interconnected pedestrian network, that is accessible to pedestrians of all abilities.
- Greater walkability achieved through pedestrian-friendly street, site and building design.
- *ME-A.2.d.* Implement Crime Prevention Through Environmental Design (CPTED) measures to reduce the threat and incidence of crime in the pedestrian environment.
- *ME-A.2.f.* Provide adequate levels of lighting for pedestrian safety and comfort.
- *ME-A.6.a.3.* Design grading plans to provide convenient and accessible pedestrian connections from new development to adjacent uses and streets.
- *ME-A.7.a.* Enhance streets and other public rights-of-way with amenities such as street trees, benches, plazas, public art or other measures including, but not limited to those described in the Pedestrian Improvement Toolbox, Table ME-1 [of the City of San Diego Mobility Element].
- *ME-A.7.b.* Design site plans and structures with pedestrian-oriented features.
- *ME-A.8.* Encourage a mix of uses in villages, commercial centers, transit corridors, employment centers and other areas as identified in community plans so that it is possible for a greater number of short trips to be made by walking.

Bicycling

- *ME-F.4.* Provide safe, convenient, and adequate short- and long-term bicycle parking facilities and other bicycle amenities for employment, retail, multi-family housing, schools and colleges, and transit facility uses.
- *ME-F.4.b.* Provide bicycle facilities and amenities to help reduce the number of vehicle trips.

Parking Management

- Increased land use efficiencies in the provision of parking.

The General Plan's *Urban Design Element* addresses the integration of new development into the natural landscape and/or existing community. The element discusses an *Urban Design Strategy*, or framework, for development as envisioned in the City of Villages Strategy based upon the following principles: (1) Contribute to the qualities that distinguish San Diego as a unique living environment; (2) Build upon our existing communities; (3) Direct growth into commercial areas where a high level of activity already exist; and (4) Preserve stable residential neighborhoods. These principles are composed of a balance of several components including natural and created features. The Urban Design Element also helps implement the "core values" related to urban form. Relevant goals and policies are as follows:

General Urban Design

- A pattern and scale of development that provides visual diversity, choice of lifestyle, opportunities for social intersection, and that respects desirable community character and context.
- A City with distinctive districts, communities, neighborhoods, and village centers where people gather and interact.
- *UD-A.4.* Use sustainable building methods in accordance with the sustainable development policies in the Conservation Element.

- *UD-A.5.* Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.
- *UD-A.5.b.* 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.
- *UD-A.5.c.* Provide architectural features that establish and define a building's appeal and enhance the neighborhood character.
- *UD-A.5.d.* Encourage the use of materials and finishes that reinforce a sense of quality and permanence.
- *UD-A.5.e.* Provide architectural interest to discourage the appearance of blank walls for development. This would include not only building walls, but fencing bordering the pedestrian network, where some form of architectural variation should be provided to add interest to the streetscape and enhance the pedestrian experience. For example, walls could protrude, recess, or change in color, height or texture to provide visual interest.
- *UD-A.5.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.
- *UD-A.5.g.* Design rear elevations of buildings to be as well-detailed and visually interesting as the front elevation, if they will be visible from a public right-of-way or accessible public place or street.
- *UD-A.5.i.* Maximize natural ventilation, sunlight, and views.
- *UD-A.5.j.* Provide convenient, safe, well-marked, and attractive pedestrian connections from the public street to building entrances.
- *UD-A.6.* Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.
- *UD-A.6.a.* Locate buildings on the site so that they reinforce street frontages.
- *UD-A.6.c.* Ensure that building entries are prominent, visible, and well-located.
- *UD-A.6.d.* Maintain existing setback patterns, except where community plans call for a change to the existing pattern.
- *UD-A.6.e.* Minimize the visual impact of garages, parking and parking portals to the pedestrian and street façades.
- *UD-A.8.* Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.
- *UD-A.8.a.* Maximize the planting of new trees, street trees and other plants for their shading, air quality, and livability benefits.
- *UD-A.8.b.* Use water conservation through the use of drought-tolerant landscape, porous materials, and reclaimed water where available.
- *UD-A.8.c.* Use landscape to support storm water management goals for filtration, percolation and erosion control.
- *UD-A.8.e.* Landscape materials and design should complement and build upon the existing character of the neighborhood.
- *UD-A.8.h.* Shade paved areas, especially parking lots.
- *UD-A.8.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.
- *UD-A.8.j.* Use landscaped walkways to direct people to proper entrances and away from private areas.
- *UD-A.11.* Encourage the use of underground or above-ground parking structures, rather than surface parking lots, to reduce land area devoted to parking.
- *UD-A.11.d.* Provide well-defined, dedicated pedestrian entrances.

- *UD-A.11.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.
- *UD-A.12.a.* Encourage placement of parking along the rear and sides of street-oriented buildings.
- *UD-A.13.* Provide lighting from a variety of sources at appropriate intensities and qualities for safety.
- *UD-A.17.* Incorporate Crime Prevention Through Environmental Design (CPTED) measures, as necessary, to reduce incidences of fear and crime, and design safer environments.

Distinctive Neighborhoods and Residential Design

- Infill housing, roadways and new construction that are sensitive to the character and quality of existing neighborhoods.
- *UD-B.1.a.* Integrate new construction with the existing fabric and scale of development in surrounding neighborhoods. Taller or denser development is not necessarily inconsistent with older, lower-density neighborhoods but must be designed with sensitivity to existing development. For example, new development should not cast shadows or create wind tunnels that will significantly impact existing development and should not restrict vehicular or pedestrian movements from existing development.
- *UD-B.2.a.* Incorporate a variety of unit types in multifamily projects.
- *UD-B.2.c.* Provide transitions of scale between higher-density development and lower-density neighborhoods.
- *UD-B.4.a.* Locate buildings on the site so that they reinforce street frontages.
- *UD-B.8.* Provide useable open space for play, recreation, and social or cultural activities in multifamily as well as single-family projects.

Mixed-Use Villages and Commercial Areas

- *UD-C.1.a.* Encourage both vertical (stacked) and horizontal (side-by-side) mixed-use development
- *UD-C.4.b.* Design or redesign buildings to include pedestrian-friendly entrances, outdoor dining areas, plazas, transparent windows, public art, and a variety of other elements to encourage pedestrian activity and interest at the ground floor level.
- *UD-C.4.d.* Provide pathways that offer direct connections from the street to building entrances.
- *UD-C.7.* Enhance the public streetscape for greater walkability and neighborhood aesthetics.

The *Economic Prosperity Element* of the General Plan links economic prosperity goals with land use distribution and employment land use policies. Its purpose is “to increase wealth and the standard of living of all San Diegans with policies that support a diverse, innovative, competitive, entrepreneurial, and sustainable local economy.” The relevant policy for the Witt Mission Valley project is:

Commercial Land Use

- *EP-B.8.* Retain the City’s existing neighborhood commercial activities and develop new commercial activities within walking distance of residential areas, unless proven infeasible.

The General Plan’s *Recreation Element* addresses the preservation, protection, acquisition, development, operation, maintenance, and enhancement of public recreation opportunities and facilities throughout the City for all users. The relevant policy of the Recreation Element to the project is the following:

Park and Recreation Guidelines

- *RE-A.10.* Encourage private development to include recreation facilities, such as children’s play areas, rooftop parks and courts, usable public plazas, and mini-parks to supplement population-based parks.

The *Conservation Element* of the General Plan 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. Sustainable development and climate change issues are also addressed through the policies of the Conservation Element. Conservation Element policies relevant to the project call for the following:

Climate Change & Sustainable Development

- *CE-A.5.* Employ sustainable or “green” building techniques for the construction and operation of buildings.
- *CE-A.9.* 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:
 - Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases;
 - 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;
 - Removing code obstacles to using recycled materials in buildings and for construction; and
 - Implementing effective economic incentives to recycle construction and demolition debris.
- *CE-A.10.* Include features in buildings to facilitate recycling of waste generated by building occupants and associated refuse storage areas.
- *CE-A.10.a.* Provide permanent, adequate, and convenient space for individual building occupants to collect refuse and recyclable material.
- *CE-A.10.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.
- *CE-A.11.* Implement sustainable landscape design and maintenance.

Sustainable Energy

- *CE-I.5.b.* Promote the use and installation of renewable energy alternatives in new and existing development.
- *CE-I.10.* Use renewable energy sources to generate energy to the extent feasible.

The General Plan’s *Noise Element* is intended to protect people living and working in the City of San Diego from excessive noise. The most prevalent noise source in the City is motor vehicle traffic. Goals and policies provided in the Noise Element guide compatible land uses and the incorporation of noise attenuation measures for new uses to protect people from an excessive noise environment.

The City of San Diego requires projects to meet exterior noise level standards as established in Policy NE-A.2 of the Noise Element of the General Plan. The Noise Compatibility Guidelines are presented in Table 5.1-1, *City of San Diego Noise Compatibility Guidelines*. In the Residential – Multiple Units land use category, noise levels up to 60 A-weighted decibel (dBA) community noise equivalent level (CNEL) are considered Compatible with outdoor use areas. Noise levels up to 70 dBA CNEL are considered Conditionally Compatible; the building structure must

Table 5.1-1. City of San Diego Noise Compatibility Guidelines

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

attenuate exterior noise in occupied areas to 45 dBA CNEL or below. In the Retail Sales and Commercial Services (excluding Visitor Accommodations) land use categories, noise levels up to 65 dBA CNEL are considered Compatible with outdoor use areas. Noise levels up to 75 dBA CNEL are considered Conditionally Compatible; the building structure must attenuate exterior noise in occupied areas to 50 dBA CNEL or below.

The Noise Element promotes the following goals and policies pertaining to noise relevant to the Witt Mission Valley project:

Noise and Land Use Compatibility

- NE-A.1. Separate excessive noise-generating uses from residential and other noise-sensitive land uses with a sufficient spatial buffer of less sensitive uses.
- NE-A.2. Assure the appropriateness of purposed developments relative to existing and future noise levels by consulting the guidelines for noise-compatible land use (shown on Table NE-3 of the General Plan) to minimize the effects on noise-sensitive land uses.
- NE-A.3. Limit future residential and other noise-sensitive land uses in areas exposed to high levels of noise.
- NE-A.4. Require an acoustical study consistent with Acoustical Study Guidelines 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 of the General Plan), so that noise mitigation measures can be included in the project design to meet the noise guidelines.
- NE-A.5. Prepare noise studies to address existing and future noise levels from noise sources that are specific to a community when updating community plans.

Motor Vehicle Noise

- Minimal excessive motor vehicle traffic noise on residential and other noise-sensitive land uses.
- NE-B.1. Encourage noise-compatible land uses and site planning adjoining existing and future highways and freeways.
- NE-B.3. 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.

Commercial and Mixed-Use Activity Noise

- Minimal exposure of residential and other noise-sensitive land uses to excessive commercial and mixed-use related noise.
- NE-E.1. Encourage the design and construction of commercial and mixed-use structures with noise attenuation methods to minimize excessive noise to residential and other noise-sensitive land use.
- NE-E.2. Encourage mixed-use developments to locate loading areas, parking lots, driveways, trash enclosures, mechanical equipment, and other high-noise components away from the residential component of the development.

Construction, Refuse Vehicles, Parking Lot Sweepers, and Public Activity Noise

- Minimal exposure of residential and other noise-sensitive land uses to excessive construction refuse vehicles, parking lot sweeper-related noise and public noise.
- NE-G.1. Implement limits on the hours of operation for non-emergency construction and refuse vehicle and parking lot sweeper activity in residential area and areas abutting residential areas.

- NE-G.2. Implement limits on excessive public noises that a person could reasonably consider disturbing and/or annoying in residential areas and areas abutting residential areas.

Typical Noise Attenuation Methods

- Attenuate the effect of noise on future residential and other noise-sensitive land uses by applying feasible noise mitigation measures.
- NE-I.1. Require noise attenuation measures to reduce the noise to an acceptable noise level for proposed developments to ensure an acceptable interior noise level, as appropriate, in accordance with California's noise insulation standards (CCR Title 24) and Airport Land Use Compatibility Plans.
- NE-I.2. Apply CCR Title 24 noise attenuation measures requirements to reduce the noise to an acceptable noise level for proposed single-family, mobile homes, senior housing, and all other types of residential uses not addressed by CCR Title 24 to ensure an acceptable interior noise level, as appropriate.

The *Public Facilities, Services and Safety Element* addresses facilities and services that are publicly managed and have a direct influence on the location of land uses. These include Fire-Rescue, Police, Wastewater, Storm Water, Water Infrastructure, Waste Management, Libraries, Schools, Information Infrastructure, Disaster Preparedness, and Seismic Safety. The policies within the Public Facilities Element also apply to transportation improvements and park and recreation facilities and services with additional guidance from the Mobility Element and the Recreation Element. The Public Facilities and Conservation Element together provide policy on both facility infrastructure and management of vital resources such as water and energy. The Public Facilities Element includes the following goals relevant to the Witt Mission Valley project:

- Protection of beneficial water resources through pollution prevention and interception efforts.
- A storm water conveyance system that effectively reduces pollutants in urban runoff and storm water to the maximum extent practicable.
- Protection of public health and safety through abated structural hazards and mitigated risks posed by seismic conditions. Development that avoids inappropriate land uses in identified seismic risk areas.

The *Housing Element* serves as a policy guide to address the comprehensive housing needs of the City of San Diego. It is intended to be an integrated, internally consistent and compatible statement of policies for housing in the City. It is one of ten elements of the City of San Diego's General Plan and is mandated by the State of California Government Code. State law mandates that local governments outline the housing needs of their community, the barriers or constraints to providing that housing, and actions proposed to address these concerns over an eight-year period. The Housing Element is subject to detailed statutory requirements and mandatory review by the California Department of Housing and Community Development (HCD), acknowledging that the availability of housing is a matter of Statewide importance and that cooperation between government and the private sector is critical to attainment of the State's housing goals. Housing Element law requires local governments to adequately plan to meet their existing and projected housing needs, including their share of the regional housing need. The law recognizes that in order for the private sector to adequately address housing needs and demand, local governments must adopt land-use plans and regulatory schemes that provide opportunities for, and do not unduly constrain, housing development. In accordance with California Senate Bill (SB) 375, which seeks to reduce GHG emissions, the Housing Element is a key part of an integrated transportation and housing planning process coordinated through a Sustainable Communities Strategy (SCS) and RTP. SB 375 recognizes the importance of planning for housing and land use in creating sustainable communities where residents of all income levels have access to jobs, services, and housing using transit, or by walking and bicycling. The Housing Element promotes the following goals, objectives, and policies relevant to the Witt Mission Valley project:

- Ensure the provision of sufficient housing for all income groups to accommodate San Diego's anticipated share of regional growth over the next housing element cycle, 2013-2020, in a manner consistent with the development pattern of the SCS, that will help meet regional GHG targets by improving transportation and land use coordination and jobs/housing balance, creating more transit-oriented, compact and walkable communities, providing more housing capacity for all income levels, and protecting resource areas.
- Cultivate the City as a sustainable model of development.
- *Objective.* Promote the reduction of GHG in accordance with SB 375 and the California Long-Term Energy Efficiency Strategic Plan; and promote consistency with the General Plan's City of Villages Strategy and other Citywide planning efforts.
- *Policy HE-J.3.* Seek to locate higher-density housing principally along transit corridors, near employment opportunities, and in proximity to village areas identified elsewhere in community plans.

City of San Diego Climate Action Plan

In December 2015, the City of San Diego adopted its CAP. 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. The CAP sets forth common-sense strategies to achieve attainable greenhouse gas reduction targets and outlines the actions that City will undertake to achieve its proportional share of State GHG emission reductions.

The CAP is a plan for the reduction of GHG emissions in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP. 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.

See Section 5.5, *Greenhouse Gas Emissions*, for a detailed discussion of current legislation and regulations regarding climate change and the CAP, as well as an evaluation of the project's consistency with the CAP Consistency Checklist.

Mission Valley Community Plan

The project site is governed by the Mission Valley Community Plan, which was adopted by the San Diego City Council in June 1985, and was most recently amended in May 2013. The Community Plan is intended to serve as a comprehensive guide for residential, industrial, and commercial developments, open space preservation, and development of a transportation network within the plan area. As presented in Section 2.0, *Environmental Setting*, and depicted in Figure 2-6, *Mission Valley Community Plan Land Use Map*, the project site is identified as Commercial Retail (MV-CR) in the Mission Valley Community Plan.

The Mission Valley Community Plan is comprised of nine elements: Land Use, Transportation, Open Space, Development Intensity, Community Facilities, Conservation, Cultural and Heritage Resources, Urban Design, and Implementation. Objectives, proposals, and development guidelines of each element of the Mission Valley Community Plan that are relevant to the project are presented below.

The *Land Use Element* addresses land use within Mission Valley. Mission Valley's major land use components are commercial, residential, and industrial. Integrated commercial and residential mixed-use developments also

comprise a major part of Mission Valley's land use fabric. The following objectives, proposals, and development guidelines are applicable to the Witt Mission Valley project:

Residential

- **Objective.** Provide a variety of housing types and densities within the community.
- **Objective.** Encourage development which combines and integrates residential uses with commercial and service uses.
- **Proposal.** Provide amenities for residents such as recreation, shopping, employment and cultural opportunities within or adjacent to residential development.
- **Development Guideline.** Provide amenities intended primarily for use by residents.
- **Development Guideline.** Encourage a wide variety of housing types and styles. Although detached single-family dwellings are probably not feasible, there are still many options available.
- **Development Guideline.** Encourage close, easy access between residences and daily shopping facilities.

Commercial

- **Objective.** Encourage multi-use development in which commercial uses are combined or integrated with other uses.
- **Proposal.** Provide neighborhood/convenience commercial facilities near, or as part of, residential developments.
- **Development Guideline.** Provide parking garages as an integral part of new development utilizing existing ground level spaces for retail activity. These parking garages should be adjacent to public streets.
- **Development Guideline.** Provide commercial-retail development in areas that are pedestrian-oriented and have pedestrian linkages to other pedestrian activity areas. Retail-oriented parking facilities should be located in close proximity to the developments.

Multiple Use Development Option

- **Objective.** Provide new development and redevelopment which integrates various land uses into coordinated multi-use projects.
- **Proposal.** Combine uses within a multi-use project to create a 24-hour cycle of activity.
- **Development Guideline.** Encourage activity on a 24-hour basis within a development project by including one or more of the following types of uses in addition to office and retail: restaurants, theatres, hotels, residences.

The *Transportation Element* contains objectives, proposals, and development guidelines for the Mission Valley community for the existing street system, parking, public transit, bicycle routes, pedestrian walkways, and light rail transit. Relevant objectives, proposals, and development guidelines for the project include the following:

Parking and Goods Delivery

- **Objective.** Provide adequate off-street parking for all new development in Mission Valley.
- **Proposal.** Discourage on-street curbside parking.
- **Proposal.** Minimize conflicts between driveways and traffic flow.
- **Proposal.** Provide adequate, well-designed off-street parking facilities.
- **Development Guidelines – Off-Street Parking.** Provide attractively designed parking structures or underground facilities to reduce the area of a site which must be devoted to parking.

- **Development Guidelines – Off-Street Parking.** Driveways should not be permitted along primary arterials and major streets where lower classification streets are available to provide adequate access. If driveways along major streets cannot be avoided, then design parking facilities to minimize the number of driveways needed. Private access roads may be used for combined parking areas.
- **Development Guidelines – Off-Street Parking.** Design parking facilities to ensure proper access and specify if for use by residents, employees, customers, visitors, goods delivery, or the handicapped.
- **Development Guidelines – Off-Street Parking.** Provide for safe and convenient pedestrian movement both within and to and from parking areas. Pedestrian ways should be incorporated into the design of parking areas so as to provide pedestrian passage through parking areas to pedestrian destinations (buildings, streets, etc.).

Pedestrian Circulation

- **Objective.** Improve the visual quality as well as the physical efficiency of the existing and future pedestrian circulation system.

Conservation and protection of natural resources are addressed in the *Conservation Element*. Resources to be conserved and/or protected include air, water, land, and energy. The following proposal is relevant to the Witt Mission Valley project:

- **Proposal.** Conserve energy by utilizing alternative energy sources and energy-efficient building and site design principles.

The *Urban Design Element* provides guidance for future development with the goal of enhancing the form and function of developments and tying the various components of the community together. The relevant design guidelines for the project are the following:

- **Design Guidelines for Landmarks.** The gateways, or entrances, into the community are [a] type of landmark. Being crisscrossed by regional freeways, Mission Valley has many of them. Each should provide a clear view into, as well as through, the community. New development located at these entrances will also become community landmarks, and should be designed with that in mind.
- **Design Guideline for Solar Access.** Buildings should orient the majority of their glass areas to the south, and deciduous trees should be located on that southern facade. This allows sun to warm the building in winter, when it is highly desirable, while providing shade in the warmer summer months.
- **Design Guideline for Solar Access.** Building facades should incorporate overhangs or canopies to shade direct sun and reduce heat gain.
- **Design Guideline for Water Conservation.** Buildings should be designed with mechanisms that will reduce water consumption. The following water saving devices should be considered: Low flow plumbing fixtures; cycle adjustment machines; pressure regulators to maintain water pressure to desirable conservation levels; hot water pipe insulation; and, automatic sprinkler systems.
- **Design Guideline for Water Conservation.** Water should be conserved by using low maintenance drought tolerant plant material, and the use of inert landscape materials (rocks, gravel, ornamental paving) and sculptured forms.

As described above, the project would be developed under the Multiple Use Development Option of the Mission Valley Community Plan. The following guidelines are specifically included for Multiple Use Development Option projects:

- **Objective:** Provide new development and redevelopment which integrates various land uses into coordinated multiuse projects.
- **Proposal:** Include a variety of revenue-producing uses in each large-scale multi-use project.
- **Proposal:** Ensure functional and physical integration of the various uses within the multi-use project and between adjacent uses or projects.
- **Development Guideline:** Multi-use development projects should include all of the following design elements: (a) Separate vehicular access and delivery loading zones. (b) People-oriented spaces. (c) Compatibility with adjacent development. (d) Uninterrupted pedestrian connections.
- **Development Guideline:** Encourage activity on a 24-hour basis within a development project by including one or more of the following types of uses in addition to office and retail: (a) Restaurants, (b) Theatres, (c) Hotels, (d) Residences.
- **Development Guideline:** Multi-use development projects should be processed and evaluated through the use of PCD permits and/or Specific Plans.
- **Characterization:** Public transit opportunities and commitments and permanent pedestrian linkages to public transit systems.
- **Characterization:** Interconnection of project components through an elaborate pedestrian circulation network (e.g., subterranean concourses, walkways and plazas at grade and aerial bridges between buildings).
- **Policy:** Provide a landscaping plan to tie the various uses together.
- **Policy:** Provide careful positioning of key project components around centrally located focal points (e.g., a shopping gallery or hotel containing a large central court).

The Mission Valley Community Plan is currently undergoing an update process which is scheduled to be completed in the summer of 2019. The last update of the Community Plan was in 1985 and with increasing development in Mission Valley, as Mission Valley becomes an alternative to downtown living, a new plan is needed to direct growth and better promote transit use. The updated Community Plan will promote the creation of walkable, mixed-use community areas, better connectivity, increased spaces for parks and recreation facilities, more mobility choices, and has a focus on celebrating the San Diego River.

Zoning

Zoning for property located in the City of San Diego is governed by the City's Land Development Code. The project site is governed by the Mission Valley Planned District Ordinance, which appears as Chapter 15, Article 14, in the City's Land Development Code. As presented in Section 2.0, *Environmental Setting*, and shown on Figure 2-7, *Existing Zoning*, the Witt Mission Valley project site is zoned MVPD-MV-CR. The purpose of the commercial zones in Mission Valley is to "provide office, hotel, and retail commercial uses as defined in the Mission Valley Community Plan." The MV-CR zone is primarily intended to accommodate community and regional-serving retail sales establishments,

As discussed in Section 2.5.2, *Mission Valley Community Plan*, the project would develop under the "Multiple Use Development Option" allowed in the Community Plan. A Multiple Use Development Option approach is intended to permit greater flexibility in project design than is possible through strict application of conventional zoning

regulations. It permits developers to combine land uses in such a way that community and individual project “self-containment” can be achieved. Self-containment means that all support facilities and services associated with a project are located either within the project or within a short walking distance. Examples include banks, restaurants, health facilities, and food markets. Self-containment is intended to reduce the number of intra-Valley automobile trips, resulting in fuel conservation, decreased air pollution, and less traffic. According to the Community Plan, developments may employ the Multiple Use Development Option when:

- Two or more significant revenue-producing uses such as retail, office, residential (either as rentals or condominiums), hotel/motel, and/or recreation—which, in well-planned projects, are financially supportive of the other uses;
- Significant functional and physical integration of project components including uninterrupted pedestrian connections, if available, to adjacent developments;
- Development in conformance with a coherent plan (which frequently stipulates the type and scale of uses, permitted densities and related items); and
- Public transit opportunities and commitments.

City of San Diego Multiple Species Conservation Program Subarea Plan

The MSCP is a comprehensive plan that has been established to preserve a network of habitat and open space in the region. The MSCP identifies a MHPA in which the permanent MSCP preserve will be assembled and managed for its biological resources. In accordance with the MSCP, the City has developed a Subarea Plan to implement the MSCP and habitat preserve within the City of San Diego. Within the MSCP, the project site is located within an urban habitat area. The Witt Mission Valley project site is within the City’s MSCP Subarea, but is not located within or adjacent to the MHPA. The closest MHPA is mapped for the San Diego River, located on the north side of Camino de la Reina beyond existing infill development, approximately 0.20 mile from the project site.

Airport Land Use Compatibility Plans

The basic function of ALUCPs is to promote compatibility between airports and the land uses that surround them to the extent that these areas are not already devoted to incompatible uses. With limited exception, California law requires preparation of an ALUCP for each public-use and military airport in the state. Most counties have established an ALUC, as provided for by law, to prepare compatibility plans for the airports in that county and to review land use plans and development proposals, as well as certain airport development plans, for consistency with the compatibility plans. In San Diego County, the ALUC function rests with the San Diego County Regional Airport Authority (SDCRAA), as provided in Section 21670.3 of the California Public Utilities Code. The project site is within the AIAs for the Montgomery Field and San Diego International Airport ALUCPs.

The project site is within the Airport Influence Area Review Area 2 and Part 77 Airspace Protection Height Notification Boundary for the Montgomery Field ALUCP. As such, the project is required to obtain an Federal Aviation Administration (FAA) Part 77 Notice of Determination letter. The project site is outside of all other Montgomery Field policy maps, which include Noise, Safety, Overflight, and Avigation Easement and Overflight Notification Area.

The project site is within the Airport Influence Area, Review Area 2, Airspace Protection Boundary, and Overflight Area Boundary for the San Diego International Airport ALUCP. The project site is outside of the Noise Contour, Safety Zone, ALUCP Impact Area, and Airport Approach Overlay Boundary policy maps. The project site is within

the Airspace Protection Boundary, but outside of the FAA Part 77 Surfaces. As such, the project is not required to obtain an FAA Part 77 Notice of Determination letter for SDIA.

5.1.3 Impact Analysis

Issue 1

Would the proposal result in a conflict with the environmental goals, objectives, or recommendations of the General/Community Plan in which it is located?

Impact Thresholds:

- Inconsistency/conflict with the environmental goals, objectives, or guidelines of a Community Plan or General Plan;
- Substantial incompatibility with an adopted plan;
- Inconsistency/conflict with adopted environmental plans for an area.

Impact Analysis

CITY OF SAN DIEGO GENERAL PLAN

The City of San Diego General Plan identifies the project site as Commercial Employment, Retail, and Services. The project does not result in a land use conflict or need for a change in land use designation because the proposed uses are consistent with the Mission Valley Community Plan, which acts as the community-specific policy document for the General Plan. The stretch of Camino de la Reina from Hotel Circle to Qualcomm Way is emerging as Mission Valley's "Main Street". The project is located along this stretch of Camino de la Reina and is within a designated gateway to the community as shown in Figure 5.1-3. *Mission Valley Community Plan – Urban Design Landmarks and Community Entrances*.

Section 5.1.2, *Regulatory Framework*, above, presents the relevant goals and policies of the City of San Diego General Plan for the project. Table 5.1-2, *General Plan Consistency Analysis*, includes the previously identified goals and policies and a discussion relative to the project's consistency with the respective goals and policies. As analyzed in Table 5.1-2, the project would be consistent with the City of San Diego General Plan. The project would support the City of Villages Strategy in that it would develop a mix of employment, retail, and residential opportunities within an existing mixed-use village that is walking distance to high-quality transit. The project would be supportive of active transportation with proximity to local pedestrian circulation facilities and regional bicycle transportation. Architecturally, the project would provide in-fill housing that is sensitive to the character and quality of the existing neighborhood, while creating a distinct identity on-site. The project would provide on-site recreational opportunities for residents and would implement sustainable design and operation strategies.

CITY OF SAN DIEGO CLIMATE ACTION PLAN

The City of San Diego adopted its Climate Action Plan in December 2015. The CAP quantifies GHG emissions, establishes citywide reduction targets for 2020 and 2035, identifies strategies and measures to reduce GHG levels, and provides guidance for monitoring progress on an annual basis. The City of San Diego CAP identifies a comprehensive set of goals and actions, including ordinances, policies, resolutions, programs, and incentives, that the City can use to reduce GHG emissions. The CAP includes strategies and actions that encourage (1) water and energy efficiency buildings; (2) clean and renewable energy; (3) bicycling, walking, transit and land use; (4) zero waste; and (5) climate resiliency. The City has adopted a CAP Consistency Checklist to determine compliance with the CAP. [The project completed an evaluation of the project's consistency with the CAP Consistency Checklist. As

presented in Section 5.5, the project has been determined to be consistent with the CAP and, therefore, would not result in a significant impact relative to GHG emissions. Refer to Section 5.5, *Greenhouse Gas Emissions*, for further detail.]

MISSION VALLEY COMMUNITY PLAN

The project is located within the Mission Valley Community Plan area. Table 5.1-3, *Mission Valley Community Plan Consistency Analysis*, includes a discussion relative to the project's consistency with the respective goals, policies, and guidelines. The analysis demonstrates that the project would be overall consistent with the goals, policies, and guidelines.

Project consistency with the San Diego International Airport and Montgomery Field ALUCPs is addressed in Section 5.10, *Health and Safety*. As is concluded in Section 5.10, the project is consistent with the applicable ALUCPs and no impacts would occur.

Relative to project consistency with an adopted environmental plan, the project site is within the City of San Diego MSCP Subarea Plan. However, the project site is not located within or adjacent to the MHPA. Therefore, no impacts would occur, and no additional analysis is required.

Significance of Impacts

The project would be consistent with all applicable goals, policies, and objectives of the General Plan as demonstrated in Table 5.1-2 and the project would be consistent with the City of San Diego's Climate Action Plan. The project would be consistent with the land use designations of the City of San Diego General Plan and the Mission Valley Community Plan. Thus, the project would be consistent with the overall goals, objectives, and/or recommendations of the General Plan, Community Plan, and any other applicable plans. Impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

Issue 2

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

Impact Threshold:

- Conflict with an adopted land use designation or intensity or secondary environmental impacts could occur.

Impact Analysis

MISSION VALLEY PLANNED DEVELOPMENT ORDINANCE

Zoning and development regulations for the project are provided in the MVPDO. Pertinent development regulations and the project parameters are illustrated in Table 5.1-4, *Mission Valley PDO Development Regulations*. The project would meet the Development Regulations of the PDO presented in Table 5.1-4, with allowable deviations from developmental regulations. The project proposes a deviation to the maximum structural development coverage to allow for maximum and efficient use of the project site. Residential, commercial retail,

and commercial office buildings are proposed to front on and address surrounding streets. An internal parking garage would provide parking for residential uses and would be wrapped inside the residential development on three sides. The deviation to allow 50.9 percent structural development coverage where 50 percent is allowed in the underlying zone.

Table 5.1-4. *Mission Valley PDO Development Regulations*

Regulation	Mission Valley PDO	Project
<i>Minimum Lot Dimension</i>		
Area	5,000 sq. ft.	223,463 sq. ft. (5.13 acres)
Street Frontage	50 ft.	> 50 ft.
Width	50 ft.	> 50 ft.
Max. Structural Coverage	50%	50.9%
<i>Setbacks</i>		
Minimum Street Yard Factor: 20	Minimum Street Yard Required – 20,540 sq. ft.	Total Street Yard Provided – 23,699 sq. ft.
Min. Street Yard Setback	10 ft.	10 ft.
Min. Property Side Setback	10 ft.	10 ft.
Rear Setback	8 ft.	16 ft.

The deviation relative to lot coverage would not result in a physical impact to the environment. The deviation would allow the project to develop greater useable open space than is required, allow for a more efficient use of the project site, and allow for greater architectural articulation. None of these features would result in a physical environmental impact. Therefore, impacts due to the project's proposed deviation would be less than significant.

The project would not meet the sidewalk and parkway width requirements of the PDO for Camino de la Reina. The PDO requires a 10-foot sidewalk and eight-foot parkway along Camino de la Reina. Along Camino de la Reina, the project proposes a five-foot wide sidewalk with a five-foot wide parkway (which includes a 4.5-foot landscaped parkway and six-inch curb), which is not in direct compliance with Table 1514-04A of the PDO. The project would not meet the sidewalk width requirements for Camino de la Siesta and Camino del Rio North. For both streets, the PDO requires a six foot sidewalk and five foot parkway. Along these streets, the project proposes five foot wide sidewalks, which is not in compliance with Table 1514-04A of the PDO.

The project proposes a deviation from the requirements along Camino de la Reina, Camino de la Siesta, and Camino del Rio North to allow for development that addresses the street and allows for pedestrian-scale project features. Specifically, the project proposes commercial buildings along Camino de la Reina, an open plaza, outdoor seating, and a grand staircase connected to the public sidewalk to access the commercial buildings and plaza area. The project proposes two courtyard amenity areas along Camino de la Siesta and a dog park at the corner of Camino de la Siesta and Camino del Rio North, which provide additional pedestrian area for residents and creates additional articulation along these streets to enhance the pedestrian experience.

Additionally, as a result of the project being located within the floodplain, proposed project development must be raised. To soften the visual appearance of the project from the street, two low terraced walls functioning as raised planters provide the necessary elevation while minimizing the visual effect to motorists and pedestrians along Camino de la Reina and Camino de la Siesta, which results in an additional constraint upon the sidewalk and parkway development along these streets. The reduced sidewalk and parkway widths do not affect pedestrian access as adequate sidewalk and parkways would still be provided for pedestrians, albeit at slightly lesser widths.

Street landscaping and the project's architectural features (i.e., low terraced walls, on-site landscaping, grand staircase) would ensure that the reduced sidewalk and parkway width would not detract from public views.

Other requirements of the PDO applicable to the project are listed below in Table 5.1-54, *Mission Valley PDO Consistency Analysis*, as well as a discussion relative to the project's consistency with the requirements. This also includes *Special Regulations* of the PDO that would apply to the project site and proposed development. The purpose of these regulations is to supplement the regulations of the underlying zones and sub-districts in order to focus on the circulation system elements of private and public development projects, site and building design features that affect public views, and signage. The project is processing a Site Development Permit with the project entitlements that satisfies the PDO requirement for a discretionary Mission Valley Development Permit. As discussed previously, the project would provide housing with residential amenities on-site (including shopkeepers units), as well as commercial retail and commercial office space. As shown in Table 5.1-54, the project meets the general and supplemental regulations of the PDO.

As shown on Table 5.2-3, *Witt Mission Valley Project Trip Generation*, up to 581 ADT is expected to be generated by the Witt Mission Valley project. The Mission Valley PDO strictly limits development intensity. According to the PDO Section 1514.0301(c)(1), "Development intensity shall be limited by the number of average daily trips (ADT) generated by the existing and proposed land uses of any development proposal". The project is located in Development Intensity District G. According to Table 1514-03A of the MVPDO, up to 344 ADT per gross acre is allowed under Development Threshold 2. For the 5.13-acre project site, the Community Plan would allow up to 1,765 ADT. As shown in Table 5.1-65, *Witt Mission Valley ADT Generation*, it can be seen that the project would generate 1,638 ADT. Therefore, the project is expected to generate fewer average daily trips than allowed under Development Threshold 2 and would be consistent with the Community Plan.

Table 5.1-65. Witt Mission Valley ADT Generation

Land Use	Intensity	Rate*	ADT
Multiple Dwelling Units	277	6/unit	1,662
Commercial Office	3600	20/KSF	72
Specialty Retail Center/Strip Commercial	2.5/KSF	40/KSF	100
High-Turnover (sit-down) Restaurant	3.5/KSF	40/KSF	140
PROPOSED SUB-TOTAL			1,974
MXD CREDIT %			17%
MXD CREDIT			336
SUB-TOTAL WITH MXD CREDIT			1,638

Source: *Rates taken from the City of San Diego, Municipal Code Table 1514-03B

Note:

ADT=Average Daily Trips

KSF= 1,000 Square Feet

Density = 54 units per acre

Significance of Impacts

The project would request deviations from maximum lot coverage and sidewalk and parkway widths required by the PDO. These deviations are permissible under the City of San Diego Land Development Code and would not result in direct or secondary physical effects. Impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

Issue 3

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

Impact Threshold:

- Exposure of sensitive receptors to noise levels that exceed standards established in the Noise Element of the General Plan (45 dBA CNEL for multi-family residential interior).

Impact Analysis

As shown in Table 5.7-4, *Existing Noise Levels*, existing/ambient measurements indicate that existing noise levels range from 64.8 dBA CNEL at the north property boundary to 70.1 dBA CNEL and 76.2 dBA CNEL at the south property boundary, first floor and upper floors, respectively. The existing noise levels at the south boundary exceed the General Plan Conditionally Compatible limit of 70 dBA CNEL, as shown in Table 5.1-1, *City of San Diego Noise Compatibility Guidelines*. However, the Noise Element of the General Plan provides that, although not considered compatible, the City conditionally allow future multiple unit and mixed-use residential uses in areas above 70 dBA CNEL, where affected primarily by motor vehicle traffic noise, provided that these uses include building design noise attenuation measures to ensure an interior noise level of 45 dBA CNEL. (Future traffic volume projections are presented in Table 5.1-76, *Future Traffic Volume Projections*. Existing speed limits and vehicle mixes on all roadways are expected to remain constant.) These uses must be located in an area where a community plan allows for multiple unit and mixed-use residential uses.

Table 5.1-76. Future Traffic Volume Projections

Roadway	Future ADT	Projection Year	Source
I-8 between SR 163 and Mission Center Road	241,100	2050	SANDAG 2017
SR 163 between I-8 and Friars Road	207,200	2050	SANDAG 2017
I-8 WB on-ramp from NB SR 163	9,100	2050	SANDAG 2017
I-8 EB off-ramp to NB SR 163	49,500	2050	SANDAG 2017
I-8 WB off-ramp to SB SR 163	30,100	2050	SANDAG 2017
I-8 WB off-ramp to NB SR 163 and Hotel Circle North	25,700	2050	SANDAG 2017
I-8 EB on-ramp from SR 163 / off to Auto Circle	30,400	2050	SANDAG 2017
I-8 WB on-ramp from Mission Center Road	16,100	2050	SANDAG 2017
Camino del Rio North between Camino de la Siesta and Camino del Arroyo	12,640	2035 (with Project)	USAI 2017
Camino de la Siesta between Camino de la Reina and Camino del Rio North	5,434	2035 (with Project)	USAI 2017
Camino de la Reina between Camino de la Siesta and Camino del Arroyo	6,774	2035 (with Project)	USAI 2017

Relative to the commercial components of the project, the existing noise level at the north boundary is 66 dBA CNEL and at the northwest corner is 69 dBA CNELAs shown in Table 5.1-1, noise levels up to 70 dBA CNEL are Conditionally Compatible. Buildings would attenuate interior noise levels to 50 dBA CNEL, as required by the City of San Diego General Plan.

Future exterior roadway noise levels on the project site were estimated based on adjustments to existing levels. Existing noise levels were increased according to the difference between the existing and future ADT volumes, as shown in Table 5.1-87, *Future Exterior Roadway Noise Levels*. Note that the existing-to-future interchange ramp volume increases were generally similar in relative magnitude to those on the main lines of I-8 and SR 163; therefore, the main lines were used as the basis of the noise increases. Future exterior roadway noise levels on the project site would range 66.1 dBA CNEL at north property boundary to 70.7 dBA CNEL and 76.8 dBA CNEL at the

project south boundary on the first floor and upper floors, respectively.

Table 5.1-87. Future Exterior Roadway Noise Levels (dBA CNEL)

Location		Existing Noise Level	Existing ADT	Future ADT	Existing-to-Future Traffic Noise Increase	Future Noise Level
ML1	South project boundary, upper floors	76.2	210,000	241,100	+0.6	76.8
ML2	South project boundary, first floor	70.1	210,000	241,100	+0.6	70.7
ML3	West project boundary, third floor	67.4	12,340	12,640	+0.1	67.5
ML4	North project boundary, first floor	64.8	153,000	153,000	+1.3	66.1

To avoid a potential inconsistency with the General Plan Noise Element, an exterior to interior acoustical analysis would be required during building permit issuance, as a condition of approval, to identify appropriate sound attenuation measures to achieve a 45 dBA CNEL interior noise level. Typical attenuation measures, such as mechanical ventilation, walls, and windows with a minimum sound transmission class rating, would be identified and implemented to assure a 45 dBA CNEL interior noise level.

Noise limits at outdoor usable areas are applicable only at required spaces. The project includes two required common outdoor usable areas: the passive courtyard facing west between two building wings in the southwest area of the project site; and the pool courtyard in the west area of the project site. These areas are included in the usable common open space required for the project. As shown in Figure 5.1-4, *Future Exterior Noise Levels*, the future noise level conditions at these courtyards would be 68 dBA CNEL and 67 dBA CNEL, respectively. As designed, future exterior roadway traffic noise levels at all required outdoor usable areas in the project would be 70 dBA CNEL or lower, and considered acceptable by the City. Future exterior roadway traffic noise levels would be 75 dBA CNEL or lower at all commercial outdoor usable areas, and considered acceptable by the City. Exterior traffic noise impacts to the project would be less than significant.

Significance of Impacts

The project would result in interior noise levels in excess of the City's Noise Compatibility Guidelines requirements. As a condition of project approval, an exterior to interior noise analysis would be required during building permit issuance to ensure that appropriate attenuation measures are implemented to achieve a 45 dBA CNEL interior noise level. The interior noise analysis would identify sound transmission loss requirements for building elements exposed to exterior noise levels exceeding 60 dBA CNEL. If the interior 45 dBA CNEL limit can be achieved only with the windows closed, the residence design would include mechanical ventilation that meets applicable California Building Code (CBC) requirements. Impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

Issue 4

Would the proposal result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?

Impact Threshold:

If the project is proposed within the Airport Environs Overlay Zone (AEOZ) as defined in Chapter 13, Article 2, Division 3 of the San Diego Municipal Code, the potential exterior noise impacts from aircraft noise would not constitute a significant environmental impact.

However, interior noise impacts will be regulated by the requirement for residential development within the AEOZ to reduce interior noise levels attributable to airport noise to 45 dB Community Noise Equivalent Level (CNEL).

Remodels and additions to single-family and multi-family residences subject to airport noise levels above 65 dB (A) CNEL ordinarily would not be considered a significant issue and a noise study would not be required for the purposes of CEQA analysis. However, new construction of hospitals, schools, day care centers, or other sensitive uses subject to airport noise levels in excess of 65 dB(A) CNEL would be considered a significant issue.

Impact Analysis

The project site is outside the projected future 60 dBA CNEL noise contour of SDIA. The project site is outside the projected future 60 dBA CNEL noise contour of Montgomery Field. Although noise associated with aircraft operations may be periodically audible on the project site or within the project buildings, airport noise impacts to the project would be less than significant.

While the project site is located within the AIA of the SDIA, the airport is eight miles southwest of the project site. Due to the distance of SDIA from the site, aircraft activities contribute very little to the ambient noise levels in the project vicinity. Based on the noise contour map in the San Diego International Airport Land Use Compatibility Plan (2014), the project site is located in an area outside the 60 dBA CNEL contours.

The project site is also located within the AIA for Montgomery Field which, is located approximately six miles north of the project site. Due to the distance of Montgomery Field from the site, aircraft activities contribute very little to the ambient noise levels in the project vicinity. Based on the noise contour map in the Montgomery Field Airport Land Use Compatibility Plan (2010), the project site is located in an area outside the 60 dBA CNEL contours.

The project proposes residential (including shopkeepers units), commercial retail, and commercial office uses. As shown in Table 5.1-1, *City of San Diego Noise Compatibility Chart*, the project is compatible with noise levels of 60 to 65 dB CNEL. Therefore, the project would be compatible with the ALUCP noise regulations.

The project site is not within the noise contours identified on the Compatibility Policy Map: Noise for Montgomery Field. The project site is also not within the safety zones identified on the Compatibility Policy Map: Safety for Montgomery Field or within the airport overflight notification area identified on the Compatibility Policy Map: Overflight and Avigation Easement and Overflight Notification Areas map. The project site is within the FAA Height Notification Boundary identified on Compatibility Policy Map: Part 77 Airspace Protection. Within the boundary, Part 77, Subpart B requires that the FAA be notified of any proposed construction of alteration having a height greater than an imaginary surface extending 100 feet outward and one foot upward (slope of 100 to one) from the runway elevation. The project site is more than five miles from Montgomery Field and within Mission Valley, which sits below the mesa where Montgomery Field is located. Tallest structures would be below 65 feet in height. The project would not result in obstruction to airport operations from Montgomery Field. Therefore, the project would not result in any significant land use impacts relative to land use compatibility with the Montgomery Field ALUCP.

Relative to the SDIA ALUCP, the project site is not within the noise contours identified on the Noise Contour Map. The project site is not within the safety zones identified on the Safety Compatibility Zones map. The project site is located within the Airspace Protection Boundary on the Airspace Protection Boundary map, but outside of the FAA Part 77 certification of non-obstruction area. Additionally, the site is within the Overflight Area Boundary on the Overflight Area Boundary map. An Overflight Notification is a buyer awareness tool that ensures prospective buyers of residential land use development near an airport are informed about the airport's potential impact on the property. The project does not propose for-sale residential land uses; therefore, this notification area is not applicable. Therefore, the project would not result in any significant land use impacts relative to land use compatibility with the SDIA ALUCP.

Significance of Impacts

The project would not result in a land use incompatibility with either SDIA or Montgomery Field ALUCPs. Therefore, impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

Table 5.1-2. General Plan Consistency Analysis

Land Use & Community Planning Element	
City of Villages Strategy	
Goal: Mixed-use villages located throughout the City and connected by high-quality transit.	Consistent – The project integrates residential (including shopkeepers units), commercial retail, and commercial office uses with a bus stop located along the project’s frontage and within walking distance of the Fashion Valley Transit Center, which provides light rail transit (trolley) and bus service connecting to destinations throughout the County. The trolley is considered high-quality, high-performing transit, and functions with peak headways of 15 minutes. The project’s mix of residential (including shopkeepers units), commercial retail, and commercial office uses in proximity to high-performing transit, when considered with the existing mix of residential, commercial, and employment uses surrounding the project site, contributes to the mixed-use village emerging within central Mission Valley.
<i>Policy LU-A.7.b.</i> Achieve transit-supportive density and design, where such density can be adequately served by public facilities and services.	
<i>Policy LU-A.10.</i> Design infill projects along transit corridors to enhance or maintain a “Main Street” character through attention to site and building design, land use mix, housing opportunities, and streetscape improvements.	Consistent – The project is located along Camino de la Reina, a designated gateway to the community. The stretch of Camino de la Reina from Hotel Circle to Qualcomm Way is emerging as Mission Valley’s “Main Street”, with an increasingly vibrant mix of residential, commercial, and employment uses as redevelopment occurs in a complementary manner to the current land uses. The portion of Camino de la Reina within the vicinity of the project site includes multi-family residential developments, commercial retail centers, and offices uses, which together provide enhanced landscaping and sidewalk treatments and 24-hour life that create the Main Street feel in this area. The project would locate the commercial retail and commercial office components to address Camino de la Reina, reinforcing this Main Street character, with a Main Street supportive residential component.
Balanced Communities and Equitable Development	
Goal: Ensure diverse and balanced neighborhoods and communities with housing available for households of all income levels.	Consistent – The project contributes to making Mission Valley a balanced community by providing for a variety of housing types and sizes within the same development. By providing a mix of studio, one-bedroom, and two-bedroom units, in addition to shopkeeper units, the project contributes to the existing variety of housing in the area and provides for a range of affordability. The unit mix also accommodates the needs of older people, as they can select a unit that meets their size and budgetary needs, all with Americans with Disabilities Act (ADA) access. Being a mixed-use project, the project provides for housing, employment, and retail amenities proximate to similar uses and transit. The project site is located within a high village propensity area and provides uses to add to the village character of this portion of Mission Valley. The Fashion Valley Transit Center is within walking distance from the site and a bus stop is adjacent to the site.
<i>Policy LU-H.1.d.</i> Ensure that neighborhood development and redevelopment addresses the needs of older people, particularly those disadvantaged by age, disability, or poverty.	
<i>Policy LU-H.4.</i> Strive for balanced commercial development.	
	Consistent – Mission Valley houses a varied mix of commercial developments, from strip commercial to

<i>Policy LU-H.4.c.</i> Ensure that commercial districts are balanced and do not exclude the retail, employment and service needs of local residents.	regional retail centers. Increasingly, as redevelopment occurs in a mixed-use fashion, commercial uses are being vertically and horizontally mixed with residential components. The project would provide commercial office and commercial retail uses within a mixed-use setting, proximate to other commercial uses and office employment. As such, the project contributes to the balance of commercial uses available within the community. The project contributes to the commercial district located within central Mission Valley and provides for additional commercial and services opportunities for residents, employees, and visitors, both of the project and the adjacent community. New employment opportunities would be provided within the project, and the project's commercial and residential uses would be available to employees of surrounding businesses. Additionally, the relatively smaller square footage of the proposed commercial uses encourages new business development and local entrepreneur opportunities.
<i>Policy LU-H.4.d.</i> Encourage local employment within new developments and provide entrepreneurial opportunities for local residents.	
<i>Policy LU-H.6.</i> Provide linkages among employment sites, housing, and villages via an integrated transit system and a well-defined pedestrian and bicycle network.	Consistent – The project would provide employment, housing, and commercial uses within walking distance of the bus and light rail transit systems, as well as the multi-use San Diego River Park Trail, which provides safe travel opportunities for pedestrian and bicyclists.
<i>Policy LU-H.7.</i> Provide a variety of different types of land uses within a community in order to offer opportunities for a diverse mix of uses and to help create a balance of land uses within a community.	Consistent – The project provides a mix of residential (including shopkeepers units), commercial retail, and commercial office uses, as well as employment opportunities, which contribute to the diversity of uses within Mission Valley and assist in the balance of land uses within the community.
Mobility Element	
Walkable Communities	
<p>Goal: A city where walking is a viable travel choice, particularly for trips of less than one-half mile.</p> <p>Goal: A safe and comfortable pedestrian environment.</p> <p>Goal: A complete, functional, and interconnected pedestrian network that is accessible to pedestrians of all abilities.</p> <p>Goal: Greater walkability achieved through pedestrian-friendly street, site and building design.</p>	<p>Consistent – The project promotes walkability by providing for a variety of uses on-site with clear pedestrian pathways to and from the site, as well as through the site to the interconnected project land use elements. The project proposes a non-contiguous sidewalk along Camino de la Reina, with a landscaped parkway planted in a variety of street trees, shrubs, and groundcovers to create a safe and comfortable pedestrian environment.</p> <p>Implementation of the parkway provides a buffer from both vehicular traffic along Camino de la Reina, as well as from the weather, as the street trees would provide shade in the summer and deciduous varieties would allow for solar heating in the winter. Additionally, the project includes internal pathways that connect the various commercial and residential elements and clearly demarcate the pedestrian circulation network. All pedestrian travel ways would be ADA accessible, ensuring usability for all pedestrians.</p> <p>Buildings within the project have been designed to address the pedestrian and create a pedestrian-friendly street scene, both along Camino de la Reina and within the project's internal drive. Commercial office and commercial retail uses along Camino de la Reina would have large windows and entries, where possible, facing the roadway. Internal to the site, shopkeeper units, commercial retail, and commercial</p>

	office uses would address the internal drive, assuring that the pedestrian feels welcome around all components of the project site.
<p><i>Policy ME-A.2.d.</i> Implement Crime Prevention Through Environmental Design (CPTED) measures to reduce the threat and incidence of crime in the pedestrian environment.</p> <p><i>Policy ME-A.2.f.</i> Provide adequate levels of lighting for pedestrian safety and comfort.</p>	<p>Consistent – The inclusion of a mix of uses which would provide for 24-hour life on the project site reduces the threat and incidence of crime. Additionally, the provision of residential units around the entire site ensures greater “eyes on the street,” acting as passive threat reduction and crime deterrent.</p> <p>The project would provide lighting in accordance with Municipal Code regulations to ensure pedestrian safety in the evening hours. Lighting would be hierarchical, with pedestrian-level lighting provided along pedestrian travel ways and crossings. Lighting would be provided at all pedestrian access points to ensure safety.</p>
<p><i>Policy ME-A.6.a.3.</i> Design grading plans to provide convenient and accessible pedestrian connections from new development to adjacent uses and streets.</p> <p><i>Policy ME-A.7.a.</i> Enhance streets and other public rights-of-way with amenities such as street trees, benches, plazas, public art or other measures including, but not limited to those described in the Pedestrian Improvement Toolbox, Table ME-1.</p> <p><i>Policy ME-A.7.b.</i> Design site plans and structures with pedestrian-oriented features.</p> <p><i>Policy ME-A.7.c.</i> Encourage the use of non-contiguous sidewalk design where appropriate to help separate pedestrians from auto traffic. In some areas, contiguous sidewalks with trees planted in grates adjacent to the street may be a preferable design.</p>	<p>Consistent – Grading for the project would create a generally flat pad outside of the flood plain. Pedestrian access to the site from the street would be provided via a grand staircase and ramps at the plaza entry in the northwest corner of the site. Connectivity to adjacent uses would be provided from public sidewalks along Camino de la Reina, Camino del Rio North, and Camino de la Siesta. Additional connectivity would be provided from the project’s internal street paralleling Camino de la Reina to the Millennium Mission Valley project to the east, as well as internal connectivity within the project. All access ways would be ADA accessible.</p> <p>Project street frontages would be enhanced with non-contiguous sidewalks and a landscaped parkway. The landscaped parkway would include street trees, shrubs, and groundcover, all of which would define the project and enhance the pedestrian experience.</p> <p>Additionally, the project would promote the use of non-motorized transportation by providing bike racks and bicycle storage with combined capacity for 129 bicycles. The provision of a wrapped parking garage (on three sides) further provides for land use efficiencies. The project would provide a landscaped buffer between surrounding streets (Camino de la Reina, Camino de la Siesta, and Camino del Rio North) and the project buildings. Full pedestrian circulation is provided along the entire perimeter of the site and enhanced pedestrian connections are included internally throughout the site, connecting the residential, open space, commercial office, and commercial retail amenity uses.</p>
<i>Policy ME-A.8.</i> Encourage a mix of uses in villages, commercial centers, transit corridors, employment centers and other areas as identified in community plans so that it is possible for a greater number of short trips to be made by walking.	<p>Consistent –The project provides a mix of residential (including shopkeepers units), commercial retail, and commercial office uses, as well as employment opportunities, which contribute to the diversity of uses within Mission Valley and assist in the balance of land uses within the community. These employment, housing, and retail uses would be provided within walking distance of the bus and light rail transit systems, as well as the multi-use San Diego River Park Trail, which provides safe travel opportunities for pedestrian and bicyclists.</p>

Bicycling	
<p><i>Policy ME-F.4.</i> Provide safe, convenient, and adequate short and long term bicycle parking facilities and other bicycle amenities for employment, retail, multi-family housing, schools, colleges, and transit facility uses.</p> <p>b. Provide bicycle facilities and amenities to help reduce the number of vehicle trips.</p>	<p>Consistent – Pedestrian/bicyclist connectivity to the Fashion Valley Transit Center is provided via the shared pedestrian/bicycle path along the San Diego River accessed by crossing Camino de la Reina. Bicycle racks would be provided at the project site for resident and employee/visitor use meeting City requirements.</p> <p>The project would reduce vehicle trips by providing easy and safe access to pedestrian and bicycle facilities, making active transit a viable first choice in transportation. Furthermore, the project provides for a mix of uses on-site, further reducing the number of vehicle trips, as residents, employees, and visitors to the site can easily walk from one use to another.</p>
Parking Management	
Goal: Increased land use efficiencies in the provision of parking	Consistent - The project proposes a central wrapped parking garage that increases land use efficiency.
Urban Design Element	
General Urban Design	
<p>Goal: A pattern and scale of development that provides visual diversity, choice of lifestyle, opportunities for social interaction, and that respects desirable community character and context.</p> <p>Goal: A City with distinctive districts, communities, neighborhoods, and village centers where people gather and interact.</p>	<p>Consistent – Project design would provide visual diversity that is articulated 360 degrees with features that range from varying building heights to recessed/protruding design elements to diverse finish materials and color palette. Opportunities for social interaction would be provided for project residents and their guests in the two project courtyards and dog park. Additionally, project residents, employees, visitors, and community members would have social interaction opportunities in the public plaza located in the northern portion of the project site. Lifestyle choices are provided within the project's multiple housing opportunities, some of which support local entrepreneurship. As such, the project contributes to the distinct Main Street district emerging in Mission Valley along Camino de la Reina, providing a hub for gathering and activity.</p>
<i>Policy UD-A.4.</i> Use sustainable building methods in accordance with the sustainable development policies in the Conservation Element.	<p>Consistent – The project would be designed to meet with LEED for Homes Silver certification. The project would provide renewable solar energy, which includes solar photovoltaic modules that would reduce fossil energy use for the project's proposed commercial uses by 30 percent. Additionally, through the use of solar photovoltaic modules, the project would reduce fossil energy use for the residential use by 50 percent.</p>
<p><i>Policy UD-A.5.</i> Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.</p> <p><i>Policy UD-A.5.b.</i> 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.</p> <p><i>Policy UD-A.5.c.</i> Provide architectural features that establish and define a building's appeal and enhance the neighborhood character.</p>	<p>Consistent – Project design would provide visual diversity that is articulated 360 degrees, from varying building heights to recessed/protruding design elements to finish materials and color palette. The project would feature architectural elements such as window and balconies; varied building mass and rooflines; and varied finishes and materials including stucco siding, stacked stone fiber cement siding, aluminum storefronts, glass railings, painted metal railings, metal awnings, sun shades, vinyl windows, metal siding, and composite wood panels. The project's architectural elements are intended to provide interesting and identifiable features, which would allow pedestrians and the motoring public to easily find their destinations. Architectural features such as varied building material,</p>

<p><i>Policy UD-A.5.d.</i> Encourage the use of materials and finishes that reinforce a sense of quality and permanence.</p> <p><i>Policy UD-A.5.e.</i> 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 experience. For example, walls could protrude, recess, or change in color, height or texture to provide visual interest.</p> <p><i>Policy UD-A.5.f.</i> 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>heights, and setbacks would provide vertical relief to the façades and would create focal points around the project for both pedestrians and passing vehicles. The project's massing, colors, and materials have been selected to complement the adjacent developments.</p> <p>The project proposes development that would vary in height from one to five stories. The residential building would be wrapped around three sides of a five-story parking structure. Lower massing would occur along Camino de la Reina in the form of single-story commercial office and commercial retail buildings. Lower massing would continue partially along Camino de la Siesta and the eastern portion of the property to allow for transition between existing uses and the project. Additionally, the project would include a plaza along Camino de la Reina, two courtyards, and a dog park. These open spaces further break up the bulk and scale of the project and avoid a solid massed appearance along the roadways or from vantage points.</p>
<p><i>Policy UD-A.5.g.</i> Design rear elevations of buildings to be as well-detailed and visually interesting as the front elevation, if they will be visible from a public right-of-way or accessible public place or street.</p>	<p>Consistent – The project proposes a wrap design, where the residential building component would wrap around a central parking garage. As such, all elevations would be treated as a front elevation, with the same amount of detail and visual interest on all sides.</p>
<p><i>Policy UD-A.5.i.</i> Maximize natural ventilation, sunlight, and views.</p>	<p>Consistent – The project maximizes natural ventilation, sunlight, and views through siting and design. The inclusion of two courtyards and a dog park around the project, as well as the public plaza, creates areas for ventilation and light to flow through the project and provides views to and from the project. Additionally, the project's varied building heights and setbacks would further maximize ventilation, sunlight, and views.</p>
<p><i>Policy UD-A.5.j.</i> Provide convenient, safe, well-marked, and attractive pedestrian connections from the public street to building entrances.</p> <p><i>Policy UD-A.6.</i> Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.</p> <p><i>Policy UD-A.6.a.</i> Locate buildings on the site so that they reinforce street frontages.</p> <p><i>Policy UD-A.6.c.</i> Ensure that building entries are prominent, visible, and well-located.</p> <p><i>Policy UD-A.6.d.</i> Maintain existing setback patterns, except where community plans call for a change to the existing pattern.</p>	<p>Consistent – The project includes public entrances from surrounding streets, as well as from the internal street that parallels Camino de la Reina. Public entrances would be demarcated with landscaping, enhanced paving, and signage to provide for safe and convenient pedestrian access. Additionally, pedestrian entrances to buildings fronting public streets would be clearly defined, prominent, and well-located for access and synergy throughout the site and adjacent uses.</p> <p>The project includes a number of features to address the street and enhance the pedestrian experience. Landscaping would be provided around the entire project, providing for visual interest at the pedestrian level along public streets and internal to the project. Residential architecture would contribute to the street frontage with first floor walk-up entries and courtyards that face the street. The commercial component includes office and retail buildings that address Camino de la Reina, as well as the project's internal street that parallels Camino de la Reina. Both the residential and commercial components to the project are sited in a manner that reinforces the street frontages. Additionally, setbacks would be consistent with those on the block to the east to maintain a consistent streetscape.</p>

<p><i>Policy UD-A.6.e.</i> Minimize the visual impact of garages, parking and parking portals to the pedestrian and street façades.</p>	<p>Consistent – The project proposes a wrap design, where the residential building component would wrap around a central parking garage. As such, all elevations would be treated as a front elevation, with the same amount of detail and visual interest on all sides. The garage and garage entrances would be fully screened by both the residential building and project landscaping. Surface parking would be landscaped and screened from view of the pedestrian on surrounding public streets by the project's commercial buildings.</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><i>Policy UD-A.8.a.</i> Maximize the planting of new trees, street trees and other plants for their shading, air quality, and livability benefits.</p> <p><i>Policy UD-A.8.b.</i> Use water conservation through the use of drought-tolerant landscape, porous materials, and reclaimed water where available.</p> <p><i>Policy UD-A.8.c.</i> Use landscape to support storm water management goals for filtration, percolation and erosion control.</p> <p><i>Policy UD-A.8.e.</i> Landscape materials and design should complement and build upon the existing character of the neighborhood.</p> <p><i>Policy UD-A.8.h.</i> Shade paved areas, especially parking lots.</p> <p><i>Policy UD-A.8.i.</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.</p> <p><i>Policy UD-A.8.j.</i> Use landscaped walkways to direct people to proper entrances and away from private areas.</p>	<p>Consistent – The project's landscape plan includes the planting of street trees along Camino de la Siesta, Camino de la Reina, and Camino del Rio North. Along Camino de la Reina, where a street tree theme is emerging, the project would use consistent species and varieties to create a cohesive appearance, while allowing for the project to have its own identity. The streetscape would be supplemented with additional parkway trees, groundcover, and low growing shrubs. The landscaping plan includes the planting of accent palm trees, as well as evergreen and deciduous trees, to create a unique aesthetic on the project site and define project entries; demarcate public, semi-public, and private spaces; identify public access points; and accentuate prominent project elements, such as the public plaza.</p> <p>Landscaping would include native, native-friendly, drought-tolerant, and low water demand plant material. Porous materials and biofiltration would be provided within the landscape plan, which support storm water management goals. Although reclaimed water is not available on the site at this time, the project would be designed to accommodate future reclaimed water access.</p> <p>Parking would be shaded. Surface parking adjacent to the commercial component would include trees for shading at regular intervals consistent with municipal code requirements. The parking garage would include a combination of shade structures and solar panels on the roof level, which provide shade to the top floor of the parking garage.</p>
<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.</p>	<p>Consistent – The project proposes a wrap design, where the residential building component would wrap around a central parking garage. Surface parking would be limited to those spaces serving the patrons of the commercial office and commercial retail components of the project and guests.</p>
<p><i>Policy UD-A.11.d.</i> Provide well-defined, dedicated pedestrian entrances.</p>	<p>Consistent – The project includes public entrances from surrounding streets, as well as from the internal street that parallels Camino de la Reina. Public entrances would be demarcated with landscaping, enhanced paving, and signage to provide for safe and convenient pedestrian access.</p>
<p><i>Policy UD-A.11.f.</i> 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><i>Policy UD-A.12.a.</i> Encourage placement of parking along the rear and sides of street-oriented buildings.</p>	<p>Consistent – The project proposes a wrap design, where the residential building component would wrap around a central parking garage. As such, all elevations would be treated as a front elevation, with the same amount of detail and visual interest on all sides.</p> <p>Commercial uses in the north portion of the project site would be located on the ground floor and would include tall,</p>

	<p>largely transparent façades. Pedestrian access would be provided from as many sides of the buildings as possible.</p> <p>The parking garage would be located away from public streets, internal to the project site. Surface parking would be located south of the commercial office and commercial retail components, screened from view by the street-oriented commercial buildings.</p>
<i>Policy UD-A.13.</i> Provide lighting from a variety of sources at appropriate intensities and qualities for safety.	Consistent – The project would provide lighting in accordance with Municipal Code regulations to ensure pedestrian safety in the evening hours. Lighting would be hierarchical, with pedestrian-level lighting provided along pedestrian travel ways and crossings. Lighting would be provided at all pedestrian access points to ensure safety.
<i>Policy UD-A.17.</i> Incorporate Crime Prevention Through Environmental Design (CPTED) measures, as necessary, to reduce incidences of fear and crime, and design safer environments.	Consistent – The inclusion of a mix of uses which would provide for 24-hour life on the project site reduces the threat and incidence of crime. Additionally, the provision of residential units ensures greater “eyes on the street,” acting as passive threat reduction and crime deterrents. The project would provide lighting in accordance with Municipal Code regulations to ensure pedestrian safety in the evening hours. Lighting would be hierarchical, with pedestrian-level lighting provided along pedestrian travel ways and crossings. Lighting would be provided at all pedestrian access points to ensure safety.
Distinctive Neighborhoods and Residential Design	
<p>Goal: Infill housing, roadways and new construction that are sensitive to the character and quality of existing neighborhoods.</p> <p><i>Policy UD-B.1.a.</i> Integrate new construction with the existing fabric and scale of development in surrounding neighborhoods. Taller or denser development is not necessarily inconsistent with older, lower-density neighborhoods but must be designed with sensitivity to existing development. For example, new development should not cast shadows or create wind tunnels that will significantly impact existing development and should not restrict vehicular or pedestrian movements from existing development.</p>	<p>Consistent – The project provides for in-fill redevelopment within an established portion of Mission Valley. Project design would provide visual diversity that is articulated 360 degrees, from varying building heights to recessed/protruding design elements to finish materials and color palette. The project would feature architectural elements such as window and balconies; varied building mass and rooflines; and varied finishes and materials including stucco siding, stacked stone fiber cement siding, aluminum storefronts, glass railings, painted metal railings, metal awnings, sun shades, vinyl windows, metal siding, and composite wood panels. The project’s architectural elements are intended to provide interesting and identifiable features, which would allow pedestrians and the motoring public to easily find their destinations. Architectural features such as varied building material, heights, and setbacks would provide vertical relief to the façades and would create focal points around the project for both pedestrians and passing vehicles. The project’s massing, colors, and materials have been selected to complement the adjacent development.</p> <p>The project proposes development that would vary in height from one to five stories. Lower massing would occur along Camino de la Reina in the form of commercial office and commercial retail buildings, as well as partially along Camino de la Siesta and the eastern portion of the property to allow for transition between existing uses and the project. The residential building would be wrapped around three sides of a five-story parking structure and would be located in the southern portion of the project site, a distance from existing multi-family residential developments to the north of the</p>

	<p>project. Additionally, the project would include a plaza along Camino de la Reina, two courtyards, and a dog park. These open spaces further break up the bulk and scale of the project and avoid a solid massed appearance along the roadways or from vantage points.</p> <p>Due to the location of the tallest project elements in the southern portion of the project site and the location of existing developments primarily to the north and west of the project, shadows would not be cast on existing developments. The project has been designed to be complementary to the redevelopment project to the east, with a lower massing on the east interfacing with the lower massing of the Millennium Mission Valley project's west side. All of these elements prevent shadow cast on adjacent developments.</p>
<i>Policy UD-B.2.a.</i> Incorporate a variety of unit types in multifamily projects.	Consistent – The project contributes to making Mission Valley a balanced community by providing for a variety of housing types and sizes within the same development. By providing a mix of studio, one-bedroom, and two-bedroom units, as well as shopkeeper units, the project contributes to the existing variety of housing in the area and provides for a range of affordability. The unit mix also accommodates the needs of older people, as they can select a unit that meet their size and budgetary needs, all with ADA access.
<i>Policy UD-B.2.c.</i> Provide transitions of scale between higher-density development and lower-density neighborhoods.	Consistent – The project generally keeps in scale with surrounding development intensity with four and 12 story office buildings to the west and five story residential to the east. Nonetheless, the project provides transition between existing and proposed development by stepping back project massing from Camino de la Reina, as well as on the east where the project interfaces with adjacent redevelopment.
<i>Policy UD-B.4.a.</i> Locate buildings on the site so that they reinforce street frontages.	<p>Consistent – The project includes public entrances from surrounding streets, as well as from the internal street that parallels Camino de la Reina. Public entrances would be demarcated with landscaping, enhanced paving, and signage to provide for safe and convenient pedestrian access. Additionally, pedestrian entrances to buildings fronting public streets would be clearly defined, prominent, and well-located for access and synergy throughout the site and adjacent uses.</p> <p>The project includes a number of features to address the street and enhance the pedestrian experience. Landscaping would be provided around and throughout the entire project, providing for visual interest at the pedestrian level along public streets and internal to the project. Residential architecture would contribute to the street frontage with first floor walk-up entries and courtyards that face the street. The commercial component includes retail and office buildings that address Camino de la Reina, as well as the project's internal street that parallels Camino de la Reina. Both the residential and commercial components to the project are sited in a manner that reinforces the street frontages. Additionally, setbacks would be consistent with those on the block to the east to maintain a consistent streetscape.</p>

<p><i>Policy UD-B.8.</i> Provide useable open space for play, recreation, and social or cultural activities in multifamily as well as single-family projects.</p>	<p>Consistent – The project includes a number of useable open space elements. The public plaza in the northwest corner of the site provides a prominent pedestrian entrance to the project and invites residents, employees, visitor, and members of the community to gather at the project site. Internal to the project would be two courtyards offering various degrees of activity, from a passive gathering courtyard to a pool courtyard as well as a dog park. These courtyards reinforce the project identity and provide abilities for residents and guests to gather.</p>
<p>Mixed-Use Villages and Commercial Areas</p>	
<p><i>Policy UD-C.1.a.</i> Encourage both vertical (stacked) and horizontal (side-by-side) mixed-use development.</p>	<p>Consistent – The project provides both vertical and horizontal mixed-use development on the same site. The stand-alone commercial office and commercial retail buildings create a synergy with the potential economic uses housed in the shopkeeper units and the residential component.</p>
<p><i>Policy UD-C.4.b.</i> Design or redesign buildings to include pedestrian-friendly entrances, outdoor dining areas, plazas, transparent windows, public art, and a variety of other elements to encourage pedestrian activity and interest at the ground floor level.</p>	<p>Consistent – The project includes pedestrian entrances from Camino de la Reina, Camino de la Siesta, and Camino del Rio North that would be clearly defined and accessible to pedestrians of all abilities. A public plaza would be provided at the northwest corner of the project site, acting as a defining project element opening the project to the community. Buildings within the project have been designed to address the pedestrian and create a pedestrian-friendly street scene, both along Camino de la Reina and within the project's internal drive. Commercial uses along Camino de la Reina would have large windows and entries, where possible, facing the roadway. Internal to the site, shopkeeper units and commercial uses would address the internal drive, assuring that the pedestrian feels welcome all around the project site. Commercial office and commercial retail buildings would include transparent windows at the pedestrian level, encouraging pedestrian activity and interest. Project landscaping and architectural elements would further promote visual interest and pedestrian activity.</p>
<p><i>Policy UD-C.4.d.</i> Provide pathways that offer direct connections from the street to building entrances.</p> <p><i>Policy UD-C.7.</i> Enhance the public streetscape for greater walkability and neighborhood aesthetics.</p>	<p>Consistent – The project includes public entrances from surrounding streets, as well as from the internal street that parallels Camino de la Reina. Public entrances would be demarcated with landscaping, enhanced paving, and signage to provide for safe and convenient pedestrian access. Additionally, pedestrian entrances to building fronting public streets would be clearly defined, prominent, and well-located for access and synergy throughout the site and adjacent uses.</p> <p>The project includes a number of features to address the street and enhance the pedestrian experience and walkability. Landscaping would be provided around the entire project, providing for visual interest at the pedestrian level along public streets and internal to the project. Residential architecture would contribute to the street frontage with first floor walk-up entries and courtyards that face the street. The commercial component includes office and retail buildings that address Camino de la Reina, as well as the project's internal street that parallels Camino de la Reina. Both the residential and commercial components to</p>

	the project are sited in a manner that reinforces the street frontages and enhances neighborhood aesthetics.
Economic Prosperity Element	
Commercial Land Use	
<i>Policy EP-B.8.</i> Retain the City's existing neighborhood commercial activities and develop new commercial activities within walking distance of residential areas, unless proven infeasible.	Consistent – The project would not retain the car dealership that is currently exists on-site. However, the project would develop new commercial activities within walking distance of residential areas, including both proposed and existing residential areas.
Public Facilities, Services, and Safety Element	
Goal: Protection of beneficial water resources through pollution prevention and interception efforts.	Consistent – As discussed in Section 7.3, <i>Hydrology</i> , and Section 7.8, <i>Water Quality</i> , water resources (i.e., the San Diego River) are in the project area. Compliance with the General Construction, Municipal Stormwater Permit, and the City of San Diego Stormwater Standards Manual would protect beneficial uses through pollution prevention and interception.
Goal: A storm water conveyance system that effectively reduces pollutants in urban runoff and storm water to the maximum extent practicable.	Consistent – As discussed in Section 7.3, <i>Hydrology</i> , and Section 7.8, <i>Water Quality</i> , water resources are located within the project area. Compliance with the City of San Diego Stormwater Standards Manual, which includes preparation of a Storm Water Pollution Prevention Plan. Implementation of construction BMPs, post-construction Standard Development Project LID/Site Design, Priority Development Project BMPs, and Treatment Control BMPs would reduce runoff rates and durations and avoid runoff of urban pollutants to the maximum extent practicable.
Goal: Protection of public health and safety through abated structural hazards and mitigated risks posed by seismic conditions.	Consistent – As discussed in Section 5.8, <i>Geologic Conditions</i> , the project would comply with all City and State structural engineering standards relative to seismicity. Additionally, the project site is not located within a high seismic risk area.
Goal: Development that avoids inappropriate land uses in identified seismic risk areas.	

Recreation Element	
<i>Policy RE-A.8.</i> Provide population-based parks at a minimum ratio of 2.8 useable acres per 1,000 residents (see also Table RE-2, Parks Guidelines). <ul style="list-style-type: none"> a. All park types within the Population-based Park Category could satisfy population-based park requirements (see also Table RE-2, Parks Guidelines). b. The allowable amount of useable acres exceeding two percent grade at any given park site would be determined on a case-by-case basis by the City. c. Include military family housing populations when calculating population-based park requirements. 	Consistent – The project proposes 267 residential units and 10 shopkeeper units and would be subject to the City's population-based park requirements. Based on a density factor of 1.85 persons per household unit according to SANDAG's 2017 forecast, at 2.8 acres per 1,000 persons, 1.38 acres of usable park land are required to serve the proposed population. Relative to the provision of population-based parks, the project would pay the park portion of the Mission Valley Development Impact Fee, which would contribute to the Mission Valley Public Facilities Financing Plan for development of future population-based parks in Mission Valley.
<i>Policy RE.A.10.</i> Encourage private development to include recreation facilities, such as children's play areas, rooftop parks and courts, useable public plazas, and mini-parks to supplement population-based parks.	Consistent – The project would provide many amenity areas. To serve residents of the project, a pool courtyard, passive courtyard, and, dog park would be provided, as well as two roof decks located on the fifth floor. The project also includes a public plaza located in between the commercial retail and commercial office uses. In total, the project proposes 15,033 square feet of private open space in the form of private balconies and 50,050 square feet of common open space in the form of on-site amenities, such as the public plaza, roof decks, and courtyards.

<p><i>Policy RE-D.6.</i> Provide safe and convenient linkages to, and within, park and recreation facilities and open space areas.</p> <p><i>Policy RE-D.6.a.</i> Provide pedestrian and bicycle paths between recreation facilities and residential development.</p>	<p>Consistent – The project site is approximately 400 feet from an entrance to the San Diego River Park Trail, a recreational facility. Safe and convenient linkage to this facility is provided via a signalized crosswalk at the intersection of Camino de la Reina and Camino de la Siesta.</p> <p>The project does not propose the development of new public recreational facilities. Instead, the project provides for both private recreation facilities for residents, as well as a plaza accessible to the public. Relative to the provision of population-based parks, the project would pay the park portion of the Mission Valley Development Impact Fee, which would contribute to the Mission Valley Public Facilities Financing Plan for development of future population-based parks in Mission Valley.</p>
<p>Conservation Element</p>	
<p>Climate Change and Sustainable Development</p>	
<p><i>Policy CE-A.5.</i> Employ sustainable or “green” building techniques for the construction and operation of buildings.</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"> • Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases; • 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; • Removing code obstacles to using recycled materials in buildings and for construction; and • Implementing effective economic incentives to recycle construction and demolition debris. <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> <p><i>Policy CE-A.10.a.</i> Provide permanent, adequate, and convenient space for individual building occupants to collect refuse and recyclable material.</p> <p><i>Policy CE-A.10.b.</i> 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> <p><i>Policy CE-A.11.</i> Implement sustainable landscape design and maintenance.</p>	<p>Consistent –The project provides for a number of sustainable design features, to include low water usage appliances, drought tolerant landscaping, solar, and promotion of recycling on-site. The project would be designed to meet with LEED for Homes Silver certification. The project would provide renewable solar energy, which includes solar photovoltaic modules that would reduce fossil energy use for the project’s proposed commercial uses by 30 percent. Additionally, through the use of solar photovoltaic modules, the project would reduce fossil energy use for the residential use by 50 percent.</p> <p>Relative to demolition and construction waste, a Waste Management Plan has been approved for the project. Per the project’s approved Waste Management Plan, the project would divert 96 percent of the demolition materials. The project would achieve 89 percent landfill diversion for construction materials. Additionally, the project would implement a target of 20 percent recycled materials. The project would provide required refuse and recyclable material storage space, as well as recyclable collection areas, in all project components.</p> <p>The project would comply with the Uniform Building Code and Title 24 requirements for building materials and insulation in order to reduce unnecessary loss of energy.</p> <p>Landscaping would include native, native-friendly, drought-tolerant, and low water demand plant material. Porous materials and biofiltration would be provided within the landscape plan, which support storm water management goals. Although reclaimed water is not available on the site at this time, the project would be designed to accommodate future reclaimed water access.</p>
<p>Sustainable Energy</p>	
<p><i>Policy CE-I.5.b.</i> Promote the use and installation of renewable energy alternatives in new and existing development.</p>	<p>Consistent – The project would be designed to meet with LEED for Homes Silver certification. The project would provide renewable solar energy, which includes solar photovoltaic modules that would reduce fossil energy use for the project’s proposed commercial use by 30 percent.</p>

<i>Policy CE-I.10.</i> Use renewable energy sources to generate energy to the extent feasible.	Additionally, through the use of solar photovoltaic modules, the project would reduce fossil energy use for the residential use by 50 percent.
Urban Runoff Management	
Goal: Protection and restoration of water bodies, including reservoirs, coastal waters, creeks, bays, and wetlands.	Consistent – Compliance with the General Construction Permit, the Municipal Stormwater Permit, and the City of San Diego Stormwater Standards Manual would reduce impacts to water quality. The project would reduce runoff rates, as the project includes greater pervious area and stormwater control features than what currently exists on-site. Project development would be two feet above the mapped flood elevation and the project would process a Conditional Letter of Map Revision per City and FEMA requirements, which demonstrates that there would be no rise in surface elevation of the River and no upstream or downstream affects.
Goal: Preservation of natural attributes of both the floodplain and floodway without endangering life and property.	
Air Quality	
Goal: Regional air quality which meets state and federal standards.	Consistent – As discussed in Section 5.4, <i>Air Quality</i> , emissions associated with the project would meet Regional Air Quality Standards.
Goal: Reduction in greenhouse gas emissions effecting climate change.	Consistent – As discussed in Section 5.5, <i>Greenhouse Gas Emissions</i> , a CAP Consistency Checklist has been completed for the project and the project was found to be in compliance.
<i>Policy CE-F.4.</i> Preserve and plant trees, and vegetation that are consistent with habitat and water conservation policies and that absorb carbon dioxide and pollutants.	Consistent –The project provides an extensive and varied landscape palette that includes an array of drought-tolerant plants, including native and native-friendly trees. Vegetation would be consistent with water conservation policies and absorb carbon dioxide and pollutants.
<i>Policy CE-F.6.</i> Encourage and provide incentives for the use of alternatives to single-occupancy vehicle use, including using public transit, carpooling, vanpooling, teleworking, bicycling, and walking. Continue to implement programs to provide City employees with incentives for the use of alternative to single-occupancy vehicles.	<p>Consistent – The project supports the use of alternatives to single-occupancy vehicles. The project is located within walking distance of Fashion Valley Transit Center, which provides local and regional mass transit opportunities via bus and light-rail transit. A bus stop for Bus Route 6 is located in front of the project site on Camino de la Reina.</p> <p>The project site is walking distance to Fashion Valley Mall, a regional mall, located north of the project site, as well as Westfield Mission Valley Mall, to the east of the project site. Other employment and retail opportunities are located within walking or local transit distance, to include office development located west of the project site and Hazard Center located to the northeast of the project site. All of these uses within walking distance support active transportation.</p> <p>The project would provide 129 bicycle parking spaces to accommodate resident, employee, and visitor bicycles. Additionally, the project includes 10 shopkeeper residential units that include retail and/or office space below. Further, the project includes a Transportation Demand Management plan that aims to reduce the use of single-occupancy vehicles through a number of mechanisms, to include unbundled residential parking.</p>
Urban Forestry	
<i>Policy CE-J.1.b.</i> Plant large canopy shade trees, where appropriate and with consideration of habitat and water	Consistent – The project’s landscape plan includes the planting of street trees along Camino de la Siesta, Camino de la Reina, and Camino del Rio North. The streetscape would

conservation goals, in order to maximize environmental benefits.	include additional parkway trees, accent palm trees, and evergreen and deciduous trees. The planting of these trees would provide shade, aid in water conservation, and provide for carbon sequestration.
Noise Element	
Noise and Land Use Compatibility	
<i>Policy NE-A.1.</i> Separate excessive noise-generating uses from residential and other noise-sensitive land uses with a sufficient spatial buffer of less sensitive uses.	<p>Consistent – As discussed in Section 5.7, <i>Noise</i>, the project would avoid noise impacts to the extent practicable, and would minimize unavoidable impacts through project design features such that no significant impacts occur. Project features would be provided to reduce noise impacts on residential units facing I-8 to allow for the efficient use of an in-fill project on the site.</p> <p>The project's main drive aisle would be located in the northern portion of the project site, away from the residential component. Mechanical equipment would be located predominantly on the roof of the buildings. Trash enclosures for the residential component would be located within the parking garage area, away from residential uses. The parking garage would have single entries from the south and north, resulting in minimal noise on residential units, and loading areas would be in the eastern portion of the site, along the fire lane. The siting and design of the project would result in minimal noise exposure to residential units.</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 to minimize the effects on noise-sensitive land uses.	<p>Consistent – As discussed in Section 5.7, <i>Noise</i>, the project would avoid noise impacts to the extent practicable, and would minimize unavoidable impacts through project design features such that no significant impacts occur. As such, the project would be consistent with General Plan Table NE-3.</p>
<i>Policy NE-A.3.</i> Limit future residential and other noise-sensitive land uses in areas exposed to high levels of noise.	<p>Consistent – As discussed in Section 5.7, <i>Noise</i>, the project would avoid noise impacts to the extent practicable, and would minimize unavoidable impacts through project design features such that no significant impacts occur. Project features would be provided to reduce noise impacts on residential units facing I-8 to allow for the efficient use of an in-fill project on the site.</p> <p>The project's main drive aisle would be located in the northern portion of the project site, away from the residential component. Mechanical equipment would be located predominantly on the roof of the buildings. Trash enclosures for the residential component would be located within the parking garage area, away from residential uses. The parking garage would have single entries from the south and north, resulting in minimal noise on residential units, and loading areas would be in the eastern portion of the site, along the fire lane. The siting and design of the project would result in minimal noise exposure to residential units.</p>
<i>Policy NE-A.4.</i> Require an acoustical study consistent with Acoustical Study Guidelines 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 of the General Plan), so that noise mitigation measures can be included in the project design to meet the noise guidelines.	<p>Consistent – As discussed in Section 5.7, <i>Noise</i>, the project would avoid noise impacts to the extent practicable, and would minimize unavoidable impacts through project design features such that no significant impacts occur. As such, the project would be consistent with General Plan Table NE-3.</p>

Motor Vehicle Noise	
<p><i>Goal:</i> Minimal excessive motor vehicle traffic noise on residential and other noise-sensitive land uses.</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.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>Consistent – As discussed in Section 5.7, <i>Noise</i>, the project would avoid noise impacts to the extent practicable, and would minimize unavoidable impacts through project design features such that no significant impacts occur. Project features would be provided to reduce noise impacts on residential units facing I-8 to allow for the efficient use of an in-fill project on the site.</p>
Commercial and Mixed-Use Activity Noise	
<p><i>Goal:</i> Minimal exposure of residential and other noise-sensitive land uses to excessive commercial and mixed-use related noise.</p> <p><i>Policy NE-E.1.</i> Encourage the design and construction of commercial and mixed-use structures with noise attenuation methods to minimize excessive noise to residential and other noise-sensitive land use.</p> <p><i>Policy NE-E.2.</i> Encourage mixed-use developments to locate loading areas, parking lots, driveways, trash enclosures, mechanical equipment, and other high-noise components away from the residential component of the development.</p>	<p>Consistent – As discussed in Section 5.7, <i>Noise</i>, the project would avoid noise impacts to the extent practicable, and minimizing unavoidable impacts through project design features such that no significant impacts occur. Project features would be provided to reduce noise impacts on residential units facing I-8 to allow for the efficient use of an in-fill project on the site.</p> <p>The project's main drive aisle would be located in the northern portion of the project site, away from the residential component. Mechanical equipment would be located predominantly on the roof of the buildings. Trash enclosures for the residential component would be located within the parking garage area, away from residential uses. The parking garage would have single entries from the south and north, resulting in minimal noise on residential units, and loading areas would be in the eastern portion of the site, along the fire lane. The siting and design of the project would result in minimal noise exposure to residential units.</p>
Construction, Refuse Vehicles, Parking Lot Sweepers, and Public Activity Noise	
<p><i>Goal:</i> Minimal exposure of residential and other noise-sensitive land uses to excessive construction refuse vehicles, parking lot sweeper-related noise and public noise.</p> <p><i>Policy NE-G.1.</i> Implement limits on the hours of operation for non-emergency construction and refuse vehicle and parking lot sweeper activity in residential area and areas abutting residential areas.</p> <p><i>Policy NE-G.2.</i> Implement limits on excessive public noises that a person could reasonably consider disturbing and/or annoying in residential areas and areas abutting residential areas.</p>	<p>Consistent – As discussed in Section 5.7, <i>Noise</i>, the project's construction activities would occur during allowable times and generate sound levels below 75 dBA Leq (12 hours), in compliance with Section 59.5.404 of the City of San Diego Municipal Code.</p>
Typical Noise Attenuation Methods	
<p><i>Goal:</i> Attenuate the effect of noise on future residential and other noise-sensitive land uses by applying feasible noise mitigation measures.</p> <p><i>Policy NE-I.1.</i> Require noise attenuation measures to reduce the noise to an acceptable noise level for proposed developments to ensure an acceptable interior noise level, as appropriate, in accordance with California's noise insulation standards (CCR Title 24) and Airport Land Use Compatibility Plans.</p>	<p>Consistent – As discussed in Section 5.7, <i>Noise</i>, the project would comply with CCR Title 24 noise attenuation measures. Additionally, as discussed in Section 5.10, <i>Health and Safety</i>, the project would be consistent with the ALUCPs for San Diego International Airport and Montgomery Field. The project site is located outside the noise contours for both applicable airports.</p>

<p><i>Policy NE-I.2.</i> Apply CCR Title 24 noise attenuation measures requirements to reduce the noise to an acceptable noise level for proposed single-family, mobile homes, senior housing, and all other types of residential uses not addressed by CCR Title 24 to ensure an acceptable interior noise level, as appropriate.</p>	
<p>Housing Element</p>	
<p>Goal: Ensure the provision of sufficient housing for all income groups to accommodate San Diego's anticipated share of regional growth over the next housing element cycle, 2013-2020, in a manner consistent with the development pattern of the Sustainable Communities Strategy (SCS), that will help meet regional GHG targets by improving transportation and land use coordination and jobs/housing balance, creating more transit-oriented, compact and walkable communities, providing more housing capacity for all income levels, and protecting resource areas.</p> <p>Goal: Cultivate the City as a sustainable model of development.</p> <p>Objective: Promote the reduction of GHG in accordance with SB 375 and the California Long-Term Energy Efficiency Strategic Plan; and promote consistency with the General Plan's City of Villages Strategy and other Citywide planning efforts.</p> <p><i>Policy HE-J.3.</i> Seek to locate higher-density housing principally along transit corridors, near employment opportunities, and in proximity to village areas identified elsewhere in community plans.</p>	<p>Consistent – The project furthers the City's ability to meet its housing needs in a manner that provides for jobs and housing on-site in a compact development that is transit-oriented and walkable. By providing housing in a variety of forms, from studio to two-bedroom and shopkeeper units, the project provides a range of affordability within its housing capacity. The project would contribute to the village forming along Camino de la Reina in Mission Valley and would promote the reduction of GHG emissions through project location (close to bus and light rail transit corridors and active transportation routes), land use mix (with housing, jobs, and retail provided both on-site and in walking distance), and design (as a LEED Silver project with solar energy provided on-site).</p>

Table 5.1-3. Mission Valley Community Plan Consistency Analysis

Land Use	
Residential	
<p>Objective. Provide a variety of housing types and densities within the community.</p> <p>Objective. Encourage development which combines and integrates residential uses with commercial and service uses.</p> <p>Proposal. Provide amenities for residents such as recreation, shopping, employment and cultural opportunities within or adjacent to residential development.</p> <p>Development Guideline. Provide amenities intended primarily for use by residents.</p> <p>Development Guideline. Encourage a wide variety of housing types and styles. Although detached single-family dwellings are probably not feasible, there are still many options available.</p> <p>Development Guideline. Encourage close, easy access between residences and daily shopping facilities.</p>	<p>Consistent – The project contributes to making Mission Valley a balanced community by providing for a variety of housing types and sizes within the same development. By providing a mix of studio, one-bedroom, and two-bedroom units, as well as shopkeeper units, the project contributes to the existing variety of housing in the area and provides for a range of affordability.</p> <p>Being a mixed-use project, the project provides for housing, employment, and retail amenities proximate to similar uses and transit. The project site is located within a high village propensity area and provides uses that add to the village character of this portion of Mission Valley. The Fashion Valley Transit Center is within walking distance from the site.</p> <p>The project would provide many amenity areas. To serve residents of the project, a pool, passive courtyard, and dog park would be provided, as well as two roof decks located on the fifth floor. The project also includes a public plaza located in between the commercial retail and commercial office uses. In total, the project proposes 15,033 square feet of private open space in the form of private balconies and 50,050 square feet of common open space in the form of on-site amenities, such as the public plaza, roof decks, and courtyards.</p>
Commercial	
<p>Objective. Encourage multi-use development in which commercial uses are combined or integrated with other uses.</p> <p>Proposal. Provide neighborhood/convenience commercial facilities near, or as part of, residential developments.</p>	<p>Consistent – The project provides multi-use development, with neighborhood commercial facilities integrated as part of residential development. The commercial retail and commercial office uses of the project are integrated horizontally and vertically, with stand-alone commercial buildings fronting Camino de la Reina and shopkeeper units facing the project's internal drive that runs parallel to Camino de la Reina.</p>
<p>Development Guideline. Provide parking garages as an integral part of new development utilizing existing ground level spaces for retail activity. These parking garages should be adjacent to public streets.</p>	<p>Consistent – The project includes a wrapped parking garage, integrated into the core of the project and surrounded by residential development on three sides. As such, it is not appropriate to integrate commercial uses into the ground floor of the parking garage, although the project does provide ground floor commercial office space in the northern portion of the project. The parking garage may be accessed from Camino del Rio North or Camino de la Siesta.</p>
<p>Development Guideline. Provide commercial-retail development in areas that are pedestrian-oriented and have pedestrian linkages to other pedestrian activity areas. Retail-oriented parking facilities should be located in close proximity to the developments.</p>	<p>Consistent – Pedestrian pathways connect the entrances to the commercial office and commercial retail uses to the pedestrian sidewalk network along Camino de la Reina and Camino de la Siesta. Pedestrian linkages to the project's office, retail, and residential features are demarcated, with the primary pedestrian entrance occurring at the public plaza in the northern portion of the project site. Parking to serve the commercial and retail uses would be provided as surface parking adjacent to the uses.</p>
Multiple Use Development Option	
<p>Objective. Provide new development and</p>	<p>Consistent – The project is a mixed-use development that integrates various land uses to include commercial retail,</p>

<p>redevelopment which integrates various land uses into coordinated multi-use projects.</p> <p>Proposal. Combine uses within a multi-use project to create a 24-hour cycle of activity.</p> <p>Development Guideline. Encourage activity on a 24-hour basis within a development project by including one or more of the following types of uses in addition to office and retail: restaurants, theatres, hotels, residences.</p>	<p>commercial office, and residential uses (including shopkeepers units), which creates a 24-hour cycle of activity.</p>
<p>Guideline. Multi-use development projects should include separate vehicular access and delivery loading zones, people oriented spaces, compatibility with adjacent development, and uninterrupted pedestrian connections.</p>	<p>Consistent — The project includes separate vehicular access and delivery loading zones from the pedestrian access points. The project incorporates many pedestrian-oriented spaces, including a public plaza, two courtyards, and a dog park. The project has been designed to be compatible with and complement adjacent development, and provides for stepped massing to reinforce the street scene and blend with the community. Uninterrupted pedestrian connections would be provided to the Millennium Mission Valley project to the east, as the two projects share an internal drive parallel to Camino de la Reina.</p>
Transportation	
Public Transit	
<p>Objective. Provide mitigation for traffic generation impacts through the provision and/or financing of public transportation facilities on a project-by-project basis.</p>	<p>Consistent — The project does not include any traffic impacts that may be mitigated through the provision and/or financing of public transportation facilities. The project would have one cumulative impact at the segment of Camino del Rio North from Camino de la Siesta to Camino del Arroyo. That impact would be mitigated by extending the two-way left turn lane on Camino del Rio North through Camino de la Siesta. The project is located adjacent to established transit in the form of bus and light rail transit. The project would retain the bus stop located on Camino de la Reina adjacent to the project site.</p>
Parking and Goods Delivery	
<p>Objective. Provide adequate off-street parking for all new development in Mission Valley.</p> <p>Proposal. Discourage on-street curbside parking.</p> <p>Proposal. Minimize conflicts between driveways and traffic flow.</p> <p>Proposal. Provide adequate, well-designed off-street parking facilities.</p> <p>Development Guidelines – Off-Street Parking. Provide attractively designed parking structures or underground facilities to reduce the area of a site which must be devoted to parking.</p> <p>Development Guidelines – Off-Street Parking. Driveways should not be permitted along primary arterials and major streets where lower classification streets are available to provide adequate access. If driveways along major streets cannot be avoided, then design parking facilities to minimize the number of driveways needed. Private access roads may be used for combined parking areas.</p>	<p>Consistent — The project would accommodate all its parking needs solely on-site. The vast majority of project parking (422 spaces) would be housed in wrapped parking garage, screened from view by residential units and landscaping. The balance of the parking (56 spaces) would be provided in a small surface lot and would predominantly serve the commercial office and commercial retail components of the project. The project requires three driveways and minimizes conflict between traffic flow and driveways. These driveways are located at areas that naturally slow traffic flow (the northern two driveways are located at each end of the project's internal street and the southern driveway is located near a bend in the road), further minimizing conflict. No driveway is located along a primary arterial or major street and access to parking facilities would be clearly demarcated for residents, employees, visitors, and deliveries.</p> <p>Pedestrian movement would be accommodated through clearly defined pedestrian walkways. Passage to and from the residential component from the commercial retail and commercial office uses and the garage would be dedicated and demarcated.</p>

<p>Development Guidelines – Off-Street Parking. Design parking facilities to ensure proper access and specify if for use by residents, employees, customers, visitors, goods delivery, or the handicapped.</p> <p>Development Guidelines – Off-Street Parking. Provide for safe and convenient pedestrian movement both within and to and from parking areas. Pedestrian ways should be incorporated into the design of parking areas so as to provide pedestrian passage through parking areas to pedestrian destinations (buildings, streets, etc.)</p>	
Pedestrian Circulation	
<p>Objective. Improve the visual quality as well as the physical efficiency of the existing and future pedestrian circulation system.</p>	<p>Consistent – The project would improve the visual quality, as well as the physical efficiency, of the existing and future pedestrian circulation system. The project includes a landscape plan that would provide extensive streetscape landscaping in the form of street trees, low shrubs, and groundcover. The pedestrian experience would be enhanced with the inclusion of a non- contiguous sidewalk and landscaped parkway along Camino de la Reina where currently only a contiguous sidewalk exists. The project provides easy pedestrian access from the road through the pedestrian pathways that would connect to Camino de la Reina, Camino de la Siesta, and Camino del Rio North. Physical efficiency is improved with the provision of an internal drive that connects to the development to the east, allowing pedestrians to move through developments without needing to access the primary sidewalk network. Access for pedestrians of all abilities is provided in all areas of pedestrian activity, parking areas, buildings, and pedestrian linkages.</p>
<p>Proposal. Provide adequate light in public areas.</p>	<p>Consistent – The project would provide lighting in accordance with Municipal Code regulations to ensure pedestrian safety in the evening hours. Lighting would be hierarchical, with pedestrian-level lighting provided along pedestrian travel ways and crossings. Lighting would be provided at all pedestrian access points to ensure safety.</p>
<p>Development Guideline. Urban plazas and project recreational areas for the commercial, residential, hotel, and office development should have direct links to both the river and the public streets parallel to the river, re: Friars Road and Camino de la Reina.</p>	<p>Consistent – The project would provide a public plaza in the northern portion of the project site. This plaza would have direct access to a public street that parallels the River (Camino de la Reina). To the north of this plaza, across the street, is a direct access to the San Diego River and view points for the San Diego River.</p>
<p>Development Guideline. Landscaped pedestrian sidewalks should be provided along all public streets to encourage pedestrian activity and expedite pedestrian access. Trees should be located adjacent to the curb to provide pedestrian scale and separation from vehicular activity without reducing normal sidewalk area. Tall, canopied trees are preferable to other trees.</p> <p>Development Guideline. Projects should front on the public street and provide identifiable pedestrian access from the street into the project, even in areas where parking lots are located between the street and the buildings.</p>	<p>Consistent – The project includes a number of features to address the street and enhance the pedestrian experience. Landscaping would be provided around the entire project, providing for visual interest at the pedestrian level along public streets and internal to the project. The project's landscape plan includes the planting of street trees along Camino de la Siesta, Camino de la Reina, and Camino del Rio North. The streetscape would be supplemented with additional parkway trees, accent palm trees, and evergreen and deciduous trees. The planting of these trees would provide shade, aid in water conservation, and provide for carbon sequestration.</p>

<p>Development Guideline. Handicapped access must be provided to all areas of pedestrian activity, parking areas, buildings, pedestrian linkages, and the community-wide pedestrian system.</p>	<p>The project includes public entrances from surrounding streets, as well as from the internal street that parallels Camino de la Reina. Public entrances would be demarcated with landscaping, enhanced paving, and signage to provide for safe and convenient pedestrian access. Additionally, pedestrian entrances to buildings fronting public streets would be clearly defined, prominent, and well-located for access and synergy throughout the site and adjacent uses.</p> <p>All provided walkways would be accessible to pedestrians of all abilities, providing linkages between the street (and surrounding community), internal project components, and parking areas.</p>
<p>Conservation</p>	
<p>Proposal. Conserve energy by utilizing alternative energy sources and energy-efficient building and site design principles.</p>	<p>Consistent – The project would be designed to meet with LEED for Homes Silver which incorporates energy efficient building and site design principles. The project would provide renewable solar energy, in the form of solar photovoltaic modules that would reduce fossil energy use for the project's proposed commercial uses by 30 percent. Additionally, through the use of solar photovoltaic modules, the project would reduce fossil energy use for the residential use by 50 percent.</p>
<p>Urban Design</p>	
<p>Design Guidelines for Landmarks. The gateways, or entrances, into the community are [a] type of landmark. Being crisscrossed by regional freeways, Mission Valley has many of them. Each should provide a clear view into, as well as through, the community. New development located at these entrances will also become community landmarks, and should be designed with that in mind.</p>	<p>Consistent – As the project area is considered a gateway to the community, the project would be designed in such a manner as to visually open this gateway area through such design treatments as stepped massing and courtyards that provide views to and from the project. Additionally, the public plaza would provide a landmark for entry into what is the emerging Main Street of Mission Valley.</p>
<p>Design Guideline for Solar Access. Buildings should orient the majority of their glass areas to the south, and deciduous trees should be located on that southern facade. This allows sun to warm the building in winter, when it is highly desirable, while providing shade in the warmer summer months.</p> <p>Design Guideline for Solar Access. Building facades should incorporate overhangs or canopies to shade direct sun and reduce heat gain.</p>	<p>Inconsistent – The project would not be consistent with the solar access design guideline calling for buildings to orient the majority of their glass areas to the south. The project includes a parking structure that is almost completely wrapped by residential units. Therefore, the glass areas of the project are spread nearly 360 degrees around the residential component. The parking garage has a roof level that is fully exposed. As such, the project design incorporates photovoltaic infrastructure into the rooftop shade structures on the upper level of the parking garage, as well as photovoltaic panels on the rooftops of the residential and commercial buildings. These shade structures generate alternative energy and provide shade over the pavement to reduce heat gain. This inconsistency does not result in a significant environmental effect, because the goal of this design guideline is to provide solar access to minimize energy demand, which is already encapsulated in project design due to the project's sustainable features.</p>
<p>Design Guideline for Water Conservation. Buildings should be designed with mechanisms that will reduce water consumption. The following water saving devices should be considered: Low flow plumbing fixtures; cycle adjustment machines; pressure regulators to maintain water pressure to desirable conservation levels; hot water pipe insulation; and, automatic sprinkler systems.</p>	<p>Consistent – The project would provide for sustainable and low water usage development. The project would comply with the Uniform Building Code (UBC) Title 24, and LEED for Homes Silver requirements for building materials and insulation in order to promote water conservation within building operation. The project incorporates water-conserving irrigation, low-flow water fixtures, and high efficiency toilets. Additionally, the project provides an extensive and varied landscape palette that includes an</p>

Design Guideline for Water Conservation. Water should be conserved by using low maintenance drought tolerant plant material, and the use of inert landscape materials (rocks, gravel, ornamental paving) and sculptured forms.	array of drought-tolerant plants and inert material for water conservation and biofiltration.
Multiple Use Development Option	
Objective: Provide new development and redevelopment which integrates various land uses into coordinated multiuse projects.	Consistent – The project integrates in-fill redevelopment with a mix of residential and commercial uses.
Proposal: Include a variety of revenue-producing uses in each large-scale multi-use project.	Consistent – Although the project is not considered a large-scale development, the project is designed to be a multi-use project that includes a variety of revenue-producing uses, including new residential, commercial retail, and commercial office uses.
Proposal: Ensure functional and physical integration of the various uses within the multi-use project and between adjacent uses or projects.	Consistent – The project includes significant functional and physical integration of project components, horizontally and vertically. The project provides uninterrupted pedestrian connections, both within the project and to adjacent developments.
Development Guideline: Multi-use development projects should include all of the following design elements: (a) Separate vehicular access and delivery loading zones. (b) People-oriented spaces. (c) Compatibility with adjacent development. (d) Uninterrupted pedestrian connections.	Consistent – The project includes: (a) separate vehicular access from pedestrian access and delivery/loading zones; (b) amenity areas for use by residents, employees, and visitors to the site (including two resident courtyards, a dog park, and a public plaza); (c) compatibility with adjacent development through complementary materials, color palette, and stepped massing; and (d) uninterrupted pedestrian connections between uses.
Development Guideline: Encourage activity on a 24-hour basis within a development project by including one or more of the following types of uses in addition to office and retail: (a) Restaurants, (b) Theatres, (c) Hotels, (d) Residences.	Consistent – The project includes multi-family residential development incorporated with a variety of commercial uses that provides for 24-hour life on the site.
Development Guideline: Multi-use development projects should be processed and evaluated through the use of PCD permits and/or Specific Plans.	Consistent – The project is being processed and evaluated through a Planned Development Permit and a Site Development Permit.
Characterization: Public transit opportunities and commitments and permanent pedestrian linkages to public transit systems.	Consistent – A bus stop for Bus Route 6 is located in front of the project site on Camino de la Reina and the project is located within walking distance to the Fashion Valley Transit Center via the protected San Diego River multi-use path. The project would enhance the permanent pedestrian access from the site to the transit center at the public plaza.
Characterization: Interconnection of project components through an elaborate pedestrian circulation network (e.g., subterranean concourses, walkways and plazas at grade and aerial bridges between buildings).	Consistent – Pedestrian linkages are provided throughout the project site that connect the various uses of the project. An internal drive would connect to the redevelopment to the east. The public plaza in the northern portion of the site provides an embellished pedestrian entry to the site and connection to the pedestrian circulation network.
Policy: Provide a landscaping plan to tie the various uses together.	Consistent – The project includes a landscaping plan that incorporates pedestrian focal points and enhanced landscaping at project entries and access points. The project landscaping palette has been designed to cohesively tie together the various components of the project, as well as integrate the project into the surrounding community.
Policy: Provide careful positioning of key project components around centrally located focal points (e.g., a shopping gallery or hotel containing a large central court).	Consistent – The project features a public plaza intended to serve residents, employees, and visitors of the project, as well as the community as a whole. The public plaza is located in the northern portion of the project site and provides a focal point to the project and a gateway to this portion of Mission Valley.

Table 5.1-54. Mission Valley PDO Consistency Analysis

Permits and Procedures	
Permit Application, Review and Issuance	
Discretionary Mission Valley Development Permit	
<p>Regulation. The Hearing Officer may approve or conditionally approve a discretionary Mission Valley Development Permit if the application is determined to be complete, and in conformance with all applicable City Council adopted regulations, policies and guidelines, and if it is found from the evidence presented that all of the following facts exist:</p> <ul style="list-style-type: none"> (A) The proposed development is consistent with the Mission Valley Community Plan and the Progress Guide and General Plan; and (B) The proposed development provides the required public facilities and is compatible with adjacent open space areas; and (C) The proposed development meets the purpose, intent and criteria of the Mission Valley Planned District Ordinance including the applicable "Guidelines for Discretionary Review" adopted as a part of this planned district; and (D) The proposed development will comply with all other relevant regulations in the San Diego Municipal Code. 	<p>Consistent –</p> <p>(A) The project proposes a mix of land uses allowed by the Mission Valley Community Plan in the MV-CR zone utilizing the Multiple Use <u>Development</u> Option of the Community Plan. Therefore, the project is consistent with the Mission Valley Community Plan. As such, the project is additionally consistent with the General Plan, and specifically implements the vision of the City of Villages Strategy.</p> <p>(B) The project does not require the provision of public facilities. The project site is outside the River Influence Area of the San Diego River Park Master Plan.</p> <p>(C) The project meets the purpose, intent, and criteria of the Mission Valley Planned District Ordinance, including the applicable Guidelines for Discretionary Review except for the sidewalk and parkway width requirement. As stated above, the project also requires a deviation to the Planned District Ordinance for Maximum Lot Coverage <u>sidewalk and parkway widths</u>.</p> <p>(D) The project complies with all other relevant regulations in the San Diego Municipal Code and does not require any deviations.</p>
Zoning and Subdistricts	
Residential Zones (MVR-1, MVR-2, MVR-3, MVR-4, MVR-5)	
Mission Valley Planned District Residential Zones Guidelines for Discretionary Review	
<p>Guideline. Provide a variety of architecturally stimulating housing types densities.</p>	<p>Consistent – The project provides architecturally distinct housing types in the form of stacked flat apartments and shopkeeper units. These housing types contribute the diverse fabric of housing opportunities in Mission Valley and particularly along Camino de la Reina, Mission Valley's emerging Main Street.</p>
<p>Guideline. Integrate residential with commercial and service uses, but discourage visitor-oriented uses immediately adjacent to residential development.</p>	<p>Consistent – The project proposes a mix of residential, shopkeeper, commercial retail, and commercial office uses. All uses within the project site are community-oriented with a pedestrian focus and intended to serve the project site and surrounding community. The visitor-oriented uses are separated from the residential uses by the internal driveway and face the shopkeeper units located in the residential building.</p>
<p>Guideline. Provide active recreation areas, common open space, child care and passive recreation amenities.</p>	<p>Consistent – The project provides active recreation in the form of the Pool Courtyard and the Fitness Center; passive recreation in the Passive Courtyard; and common open space throughout the project site, specifically within the dog park. Child care is not provided on the project site.</p>
<p>Guideline. Architectural design and appearance throughout the development should be complementary.</p>	<p>Consistent – The various project features and buildings elevations have been designed to provide a cohesive project with infusions of interest and pops of color to avoid the appearance of a uni-dimensional development. Building identities relative to the uses they house (residential,</p>

	shopkeeper, commercial, etc.) are unique in design and execution, while remaining complementary to the overall project with consistent finishes, materials, and/or design elements.
Guideline. Common areas and recreational facilities should be readily accessible to the occupants of the dwelling units.	Consistent – Common areas are located throughout the project, with ready access for all residents. Residential amenities would be in the southwest corner of the project (dog park), along the western boundary of the project (Passive Courtyard and Pool Courtyard), and in the central portion of the site (Fitness Center, Bike Shop, and Communal Workspace).
Commercial Zones (MV-CO, MV-CV, MV-CR)	
Street and Major Pedestrian Path Orientation	
<p>Regulation. All commercial and multiple use structures shall contain an identifiable pedestrian entrance from the street into the project. Attention should be given to safe pedestrian passage through parking areas.</p> <p>Regulation. If adjacent to Mission Valley Community Plan identified “Major Pedestrian Paths”</p> <ul style="list-style-type: none"> (A) The dominant feature of all ground floor frontage of all new or reconstructed first story building walls that face a Mission Valley Community Plan identified “Major Pedestrian Path” shall be pedestrian entrances or windows affording views into retail consumer services, offices, lobby space or display windows. (B) Where a project is bounded on one or two sides by major pedestrian paths, parking structures shall not be located between the buildings and the major pedestrian path(s). (C) Where a project is bounded on three or more sides by major pedestrian paths, parking structures are not permitted between the building and two of these paths. (D) Exemption. Where offices are located along major pedestrian paths, the windows facing the path shall not be required to afford views into offices when the building is setback an additional 15 feet over the required setback. 	<p>Consistent – Pedestrian circulation for the project is shown in Figure 3-3, <i>Access & Open Space Diagram</i>. As shown, pedestrian access is identified at several locations. Non-contiguous public sidewalks would provide access along bordering streets. Access into residential buildings and shopkeeper units would occur from the public sidewalk, and additional pedestrian paths throughout the project would be provided. The commercial uses proposed along Camino de la Reina would have access where feasible and through the plaza. Safe pedestrian access is also identified through the public parking area located between the commercial uses and the residential structures.</p> <p>(A) – (D): As shown in Figure 5.1-2, <i>Mission Valley Community Plan – Pedestrian Circulation System</i>, the project site is bounded by one Major Pedestrian Path located along Camino de la Reina. In accordance with the PDO, the pedestrian access and entrances are located on this frontage at the east and west corners. Windows of commercial space would front on Camino de la Reina, as well as a plaza that would be open to the public. No parking structures would be located between the commercial buildings and the Major Pedestrian Path.</p>
Architectural Design	
<p>Regulation. All commercial or mixed-use structures processed with a discretionary permit shall provide at least two of the features listed below. Exceptions may be made to achieve a superior design as stated in Section 1514.0201(d)(4).</p> <ul style="list-style-type: none"> (E) Slim Tower - To maximize view corridors to the river and hillside areas, the upper levels of the structure shall diminish in size to create a slimmer silhouette than the lower levels of the structure. This feature is particularly desirable for buildings over 100 feet high located along major north-south streets. (F) Plaza - To create a pedestrian gathering spot, provide a landscaped/hardscaped area that is 	<p>Consistent –</p> <p>(E) The project site is not located adjacent to a view corridor to the San Diego River or hillside areas. The San Diego River is blocked from view due to existing multi-family residential and freeway development. Upper level units along the southern portion of the project may be able to view the southern hillsides of Mission Valley leading up to Uptown and North Park; however, there are no identified view corridors to be preserved to these hillsides from the project site and views at the pedestrian level are blocked by freeway development and buildings south of the freeway.</p> <p>(F) The project provides a landscaped and hardscaped plaza in the northwest corner of the site, accessible from public</p>

<p>open to the sky at street level and visually and physically accessible from a major pedestrian path (see Appendix B, Figure 5) or public right-of-way. The plaza should have a focal point such as a sculpture, garden or fountain and are to be located readily adjacent to the public right-of-way. This feature would be especially suited to structures located along Mission Valley Community Plan identified "Major Pedestrian Paths (see Appendix B, Figure 5)".</p> <p>(G) Roof Element - To create a unique skyline and enhance views of building tops from above flat or unusable roof area shall be minimized.</p> <p>(H) Architectural Detail - To increase interest in the community through variations in building facades, architectural detail may include, material and color variations, bay windows, awnings, columns, cornices, eaves, window casings or any combination of these or other similar elements acceptable to the City Manager.</p> <p>(I) Offsetting Surfaces - To break up building mass to achieve a more human scale, each building wall elevation which faces any street or river yard shall have building offset variations, acceptable to the City Manager.</p>	<p>right-of-way along Camino de la Reina and Camino de la Siesta, as well as from internal project components. The focal point of the plaza would be the amphitheater-style steps featuring hardscape and landscape that create space for socializing, gathering, observation, and reflection adjacent to the San Diego River and project commercial components.</p> <p>(G) Roof area would be utilized for photovoltaic panels on the residential building and parking on the garage. A portion of the roof on the northwestern edge of the building would be open to two decks located on the fifth story. As such, most roof space would be useable and occupied.</p> <p>(H) The active commercial component of the project is in the northern portion of the project site. Architectural detail includes double-height commercial base (shopkeeper units), which promotes a pedestrian scale and creates a unified look and scale with commercial uses on both sides of the internal street. The residential building component of the project is in the central portion of the project site. This building includes a simple massing of stacked flats interrupted by courtyards and wrapped around the central parking garage. The lower level of the building has different material and color to bring the massing to a more residential scale. Additionally, the massing steps and balcony pairing in key areas adds interest to the elevations. The freeway building component of the project is in the southern portion of the project site. This building features large massing that is easy to perceive by motorists while going by on the freeway. There are material and color changes for visual interest along the façade. Additionally, the massing of the building steps down to pair with the lower height of the project under construction to the east.</p> <p>(I) As described above, the project design offers several offsetting planes along the freeway, as well as Camino de la Reina. Infusion of courtyard in the western portion of the project further breaks up the massing of the building. Similarly, the placement of the commercial buildings along Camino de la Reina, with the residential building behind, creates interest at the human scale and breaks up building mass.</p>
Commercial Zones (MV-CO, MV-CV, MV-CR) Guidelines for Discretionary Review	
<p>Guideline. Continue the commercial recreation, retail, and office land use emphasis in the western, central, and eastern, respectively, portions of the valley, but permit mixed use projects within these areas.</p> <p>Guideline. Provide new neighborhood convenience centers, especially 1 with a supermarket, near residential areas.</p> <p>Guideline. Pedestrian and bicycle connections between activity centers and transit station/stops should be provided to increase use of alternative forms of transportation.</p>	<p>Consistent – The project provides commercial emphasis in the central portion of Mission Valley within a mixed-use project.</p> <p>Consistent – N/A. The project does not propose a neighborhood convenience center, as it is an in-fill redevelopment of a single parcel. The project size and intention does not support development of something as large as a neighborhood convenience center with a supermarket.</p> <p>Consistent – Pedestrian and bicycle connections would be provided in the form of sidewalks, the San Diego River multi-use path, and in-road bicycle routes to such activity centers</p>

<p>Automobile circulation within developments should be designed to minimize impacts upon these connections.</p> <p>Guideline. Relate new projects physically and visually to existing development by linking pedestrian paths and providing compatible signage, landscaping, or various architectural features as appropriate.</p> <p>Guideline. Architectural design and appearance throughout the development should be complementary.</p>	<p>as Fashion Valley Mall and Westfield Mission Valley Mall (as well as farther activity centers, such as those found in Civita and around Qualcomm Stadium) and both transit stops (adjacent bus stops) and transit stations (Fashion Valley Transit Center, Hazard Center trolley station, Mission Valley trolley station).</p> <p>Consistent – The project physically connects to the project under construction to the east (Millennium Mission Valley) through a continuation of an internal street being provided on that under construction project. Additionally, because the project and the project under construction share the same architect and applicant, the architecture and design of both the hardscape and softscape has been undertaken to be complementary while enabling each development to have its own unique identity.</p> <p>Consistent – As discussed above, project design utilizes consistent elements such as materials, color, and architectural details to ensure complementary design throughout the project.</p>
General and Supplemental Regulations	
Landscaping	
Sidewalks/Parkways	
<p>Regulation. Pedestrian sidewalks separated from the street by landscaped parkways shall be provided in relation to street classification.</p> <p>Regulation. The placing of signs, utilities and other public facilities shall be done in a manner so as to provide the clear unobstructed corridor sidewalk width and parkway design as required by the Mission Valley Planned District Ordinance.</p> <p>Regulation. Pedestrian sidewalks and parkways are to be provided in accordance with Table 1514-04A of the PDO, which requires that a 10-foot wide sidewalk and eight-foot wide parkway be provided along Camino de la Reina, a six-foot wide sidewalk and five-foot wide parkway be provided along Camino del Rio North, and a six-foot wide sidewalk with a five-foot wide parkway be provided along Camino de la Siesta.</p>	<p>Consistent – The project provides sidewalks that are separated from public streets by a landscaped parkway. All project sidewalks would be five feet wide. The sidewalks would not meet the requirements of the PDO for Camino de la Reina where a 10-foot-wide sidewalk is required and Camino del Rio North and Camino de la Siesta where six-foot-wide sidewalks are required. Additionally, the parkway would not meet the requirement for Camino de la Reina (five feet proposed where eight feet is required). The project proposes a deviation from these requirements to allow for development that addresses the street and allows for pedestrian-scale project features, which address the intent of this regulation. As such, the project would be consistent with the regulation with the allowable deviations. The reduced sidewalk and parkway widths do not affect pedestrian access as adequate sidewalk space would be provided for pedestrians.</p> <p>The placement of signs, utilities, and other public facilities would provide a clear unobstructed sidewalk width and parkway design as required by the PDO.</p>
Parking and Circulation System	
Vehicular Use Area	
<p>Surface Parking</p> <p>Regulation. Pedestrian Access - safe, usable pedestrian pathways shall be provided through parking areas to building entrances.</p> <p>Regulation. Driveway widths shall be in conformance with Land Development Code Section 142.0560(j).</p>	<p>Consistent – The surface parking areas have been designed in accordance with City requirements. Safe pedestrian access is identified through the surface parking areas adjacent to the commercial office and commercial retail buildings and connects with building entrances and the pedestrian plaza.</p> <p>Land Development Code Section 142.0560(j) requires a minimum width for two-way driveways of 20 feet and a maximum width of 25 feet; driveways that serve as direct access to off-street parking spaces and traverse a sidewalk</p>

	<p>or curb shall be at least 20 feet long measured from the back of the sidewalk to that portion of the driveway most distant from the sidewalk; driveway entrances crossing a sidewalk shall maintain the scoring pattern and color used in the adjacent sidewalk areas; a maximum of one driveway opening for each 150 feet of street frontage; driveways may be up to five percent gradient with no transitions; and all driveways shall lead to a legal, off-street parking area or loading area on the same premises. Driveway widths for the project are 24 feet and the internal driveway that serves off-street surface parking and crosses a sidewalk would be more than 20 feet long measured from the back of the sidewalk to that portion of the driveway most distant from the sidewalk in compliance with Land Development Code Section 142.0560(j). All project driveway entrances crossing a sidewalk would maintain the scoring pattern and color used in the adjacent sidewalk areas and project driveways would have a five percent gradient per the regulations of the Land Development Code Section 142.0560(j). The project's street frontage and the three project driveways are in accordance with regulations of the Land Development Code Section 142.0560(j).</p>
<p>Structured Parking Regulation. Parking structures shall be in conformance with Land Development Code Section 142.0560(k).</p>	<p>Consistent – Land Development Code Section 142.0560(k) requires the perimeter of each parking structure floor above street level to have an opaque screen or other screening mechanism at least three and a half feet high to shield automobiles from public view; an architectural treatment, such as a finished fascia, shall be provided to shield any unfinished structural elements or mechanical appurtenances from a viewing position at grades from the opposite side of the street; lights visible from the exterior of the structure shall comply with Section 142.0740; the top floor of parking structures that are open to the sky are subject to the vehicular use area requirements of the Landscape Regulations (Chapter 14, Article 2, Division 4); and the maximum gradient in any direction within a parking structure is six percent except that where unusual or special circumstances warrant.</p> <p>The parking structure is wrapped by the project's residential units on three sides; therefore, no automobiles would be in the public view. All mechanical equipment would be screened so that they are not in view. The Landscape Regulations would require vehicular use areas exposed to open sky to provide landscape planting area and points for shade over pavement and screening. In lieu of providing trees on the rooftop, the project proposes solar panels on the roof level which, in combination with shade structures, will provide shade to the top floor of the parking garage. The gradient in the parking structure would be five percent, which complies with the Land Development Code Section 142.0560(k). The parking structure has been designed in accordance with City requirements and is in conformance with Land Development Code Section 142.0560(k).</p>
<p>Bicycle Parking Facilities Regulation. Bicycle parking facilities and lockers shall be provided in accordance with Land Development Code Sections 142.0525 and 142.0530.</p>	<p>Consistent – Land Development Code Section 142.0525 requires 123 bicycle parking spaces for the residential uses of the project and Section 142.0530 requires four bicycle</p>

	parking spaces for the retail/office uses of the project. The project would provide 129 bicycle parking spaces and lockers that have been designed in accordance with City requirements and are in accordance with Land Development Code Sections 142.0525 and 142.0530.
Public Access Easement	
Regulation. A pedestrian public access easement shall be provided through projects that are greater than 4 acres in size. These easements should provide links between public roads, high activity centers, recreational areas and transit corridors.	Consistent – The project would provide a public plaza in the northern portion of the project site. This plaza would have direct access to a public street that parallels the River (Camino de la Reina). To the north of this plaza, across the street, is direct access to the San Diego River trail and view points for the San Diego River.
Supplemental Design Requirements	
Height	
Requirement. Buildings located north of Interstate 8 and south of Friars Road shall not exceed 250 feet in height.	Consistent – The project's building heights would not exceed 60 feet. The project would be in compliance with this requirement.
Reflectivity	
Requirement. Reflective material should not be used in a way which causes a traffic hazard, diminishes the quality of riparian habitat, or reduces the enjoyment of public open space.	Consistent – The project would not use reflective materials in a way which causes a traffic hazard, diminishes the quality of riparian habitat, or reduces the enjoyment of public open space. Additionally, reflective building materials would not to be permitted where the City Manager determines that their use would contribute to potential traffic hazards, diminished quality of riparian habitat, or reduced enjoyment of public open space.
Roof Treatment	
<p>Requirement. All new structures or enlargements shall have no single flat roof element (less than 10 percent in slope) constitute more than 40 percent of the building's coverage. Separate flat roof elements must be differentiated by an elevation of at least 5 feet; OR</p> <p>Requirement. At least 40 percent of the flat roof elements shall be designed structurally and architecturally to accommodate outdoor activities; OR</p> <p>Requirement. The flat roof element shall be designed as an architectural/landscape amenity to enhance the views from the proposed structure or adjacent structures. Such enhancements may consider roof gardens, architectural features, special pavings and patterns or other comparable treatment.</p>	Consistent – The project proposes roofs with varying heights and slopes. Flat roof elements incorporate three roof decks, as well as roof parking with a combination of shade structures and solar panels on the roof level to provide shade to the top floor of the parking garage. As such, the project includes roof elements that enhance views of the proposed building.
Enclosures	
Requirement. Mechanical Equipment- no utility equipment, mechanical equipment, tank, duct, elevator enclosure, cooling tower, or mechanical ventilator shall be erected, constructed, maintained, or altered anywhere on the premises unless all such equipment and appurtenances are contained within a completely enclosed penthouse or other portion of a building having walls or visual screening with construction and appearance similar to the main building. Other methods of screening and/or visually blending mechanical equipment with the appearance of the main building shall be considered through the processing of a discretionary permit.	<p>Consistent – The project would, in accordance with City regulations, enclose and/or screen all rooftop mechanical equipment.</p> <p>All fences and walls would adhere to the Fence Regulations in the Land Development Code (Chapter 14, Article 2, Division 3). Use of walls is limited on the project. Wall heights on the project site range from one foot to eight feet. Where walls are proposed, they have been designed in accordance with the City's Fence Regulations.</p>

Requirement. Fence and Wall- applicable fence and wall regulations are contained in Land Development Code Chapter 14, Article 2, Division 3 (Fence Regulations).	
Signage	
<p>Land Development Code Chapter 12, Article 9, Division 8 (Sign Permit Procedures) and Chapter 14, Article 2, Division 12 (Sign Regulations) apply except as stated below:</p> <p>Requirement. Directional signage. All residential and commercial office establishments shall provide a maximum 2-foot high ground mounted sign located within the street yard setback within 5 feet of the driveway entrance, with maximum 6-inch high characters intended solely for the purpose of street address identification. This signage will not be calculated against permitted signage allowed under the Land Development Code.</p> <p>Requirement. Roof signs shall not be permitted anywhere within the Mission Valley Planned District Ordinance area.</p>	Consistent – The project would be in conformance with the City’s Sign Regulations. No signs would be placed on the roof of any project buildings.
Lighting	
Requirement. Any artificial lighting shall be directed or shaded so as not to fall onto adjacent properties not held in the same ownership.	Consistent – The project would direct or shade any artificial lighting as not to fall onto adjacent properties.
Guidelines for Discretionary Review	
Guideline. Building height, spacing and bulk should be designed to create landscaped see-through areas from projects to community landmarks and open space features.	Consistent – The Mission Valley Community Plan describes the many gateways, or entrances, into the community as a type of landmark, where development should provide a clear view into, as well as through, the community. The project has been designed to be sensitive to community views, as described in Section 5.3, <i>Visual Effects and Neighborhood Character</i> . Buildings would be setback and view openings to and from the project are provided at the various amenity areas.
Guideline. Incorporate crime inhibiting design principles into project design.	Consistent – Crime-inhibiting design principles have been incorporated into the project design, such as the provision of multiple uses to create 24-hour life on the project site; access control to properly locate entrances, exits, fencing, landscaping and lighting that can subtly direct both foot and vehicular traffic in ways that decreases criminal opportunities; and well-defined spaces. Additionally, the provision of residential units ensures greater “eyes on the street,” acting as passive threat reduction and crime deterrents.
Guideline. Incorporate employee services (restaurants, cleaners, showers etc.) into developments.	Consistent –The project includes commercial office and commercial retail uses. It is anticipated that restaurants, with outdoor seating areas, would be part of the retail uses, as well as other employee serving uses.
Guideline. Cluster neighborhood commercial uses near residential developments.	Consistent – The project would infuse commercial uses into an area with existing residential and office development.
Guideline. Long term maintenance for all vegetation should be provided in accordance with adopted City-wide landscape standards.	Consistent – All landscaping would be maintained in accordance with adopted Citywide landscape standards.
Guideline. Roofs should be designed to enclose mechanical equipment and to be used for recreational, retail, or restaurant uses.	Consistent – The project would, in accordance with City regulations, enclose and/or screen all rooftop mechanical equipment.
Transportation	
Guideline. Site circulation elements to reduce conflicts between pedestrians, bicycles transit uses, and vehicles.	Consistent – Site circulation elements would include clearly demarcated pathways for pedestrians, bicyclists, and

	motorists. Conflicts between pedestrians and motorists would be avoided by locating pedestrian and vehicular entries in different areas of the project. Transit opportunities exist within the project area currently and would not be affected by the project.
Guideline. Provide theme street tree planting.	Consistent – The project provides a palette of theme street tree plantings that are compatible with the existing community while providing for project identification.
Guideline. Implement transportation demand management techniques such as employer subsidization of transit passes and van pools, employee flex-time, and preferential parking for car pools to reduce reliance on the single occupant motor vehicle.	Consistent – The project would include transportation demand management techniques such as unbundled residential parking, preferred parking for carpools and vanpools, preferred parking for energy efficient vehicles, and electric vehicle charging.
Parking Areas	
Guideline. Permit and encourage shared parking areas.	Consistent – Within the project site, areas where parking may be shared between commercial users and visitors would be provided.
Guideline. Minimize driveways along primary arterials and major street through parking facility design and the use of lower classification streets for access.	Consistent – The project provides multiple points of entry. The primary access points would be from Camino del Rio (for the residential component) and Camino de la Siesta (for the commercial component), which are lower classification streets. Only one driveway would be provided along Camino de la Reina.
Guideline. Provide safe, convenient and pleasant pedestrian passages, within, to and from parking areas.	Consistent – The project would include safe, convenient, and pleasant pedestrian passages to and from parking areas. Pedestrian paths would be demarcated with landscaping, enhanced paving, and signage to provide for safe and convenient pedestrian access. Lighting would be provided at all pedestrian access point to further ensure safety.
<p>Guideline. Landscape parking areas with long lived, round headed trees that have a mature height and spread of at least 30 feet, screening hedges and shrubs, and mounding around the edges. Turf areas should be minimized. The adopted city-wide landscape regulations should be used as a minimum standard.</p> <p>Guideline. Use trees and plants as the dominant elements of major project entries.</p> <p>Guideline. Screen parking areas with berms and landscaping.</p> <p>Guideline. Patterned paving may be substituted for part of the living landscaping requirement.</p> <p>Guideline. A minimum of 10 percent of the parking lot area should be landscaped.</p>	<p>Consistent – As described in Section 3.0, <i>Project Description</i>, the project includes a comprehensive landscape plan. Landscaping of parking areas is proposed in accordance with the City's Landscape Regulations. Parking areas would be landscaped with mature evergreen trees with a large canopy such as Marina Madrone, fern pine, African sumac, and New Zealand Christmas tree, as well as screening shrubs. The parking garage and garage entrances would be fully screened by both the residential building and project landscaping. Project entrances would be enhanced with trees and shrubs. Turf areas would be kept to a minimum. Surface parking would be landscaped and screened from view of pedestrians on surrounding streets by the project's commercial buildings.</p> <p>The project includes 21,800 square feet of parking lot area to serve the commercial components of the project. 3,445 square feet of the parking lot is set aside for planting area. As such, 16 percent of the parking lot area is dedicated to landscaped area.</p>
Bicycle Facilities	
<p>Guideline. Provide secure bicycle parking at activity areas, transit stops, commercial areas and sports/recreational facilities.</p> <p>Guideline. Bicycle parking facilities should include both bicycle racks and bicycle lockers. Bicycle lockers should be provided for employees arriving by bicycle at major activity centers.</p>	Consistent – The project would provide 129 bicycle parking spaces, which exceeds the City's Municipal Code (Chapter 14, Article 2, Division 5) requirement of 127 bicycle parking spaces. Both short-term (bicycle racks) and long-term (bicycle lockers) would be provided, as appropriate. Short-term bicycle parking would be located outside near commercial areas. The long-term bicycle parking would be located near the residential areas in the parking structure.

<p>Guideline. Bicycle parking facilities should be located close to the entrance of the activity center.</p>	<p>The project does not propose an activity center. However, bicycle parking would be located close to the intended user group (i.e. residential bicycle parking near residential components and commercial bicycle parking near commercial components).</p>
<p>Pedestrian Circulation</p> <p>Guideline. Provide pedestrian amenities such as public plazas, canopies, patterned sidewalks, information kiosks, benches, and adequate lighting along sidewalks and pedestrian paths through and between developments located along transit corridors.</p> <p>Guideline. Locate tall, canopied trees adjacent to the curb, between the street and sidewalk, in accordance with Land Development Code Chapter 14, Article 2, Division 4 (Landscape Regulations).</p> <p>Guideline. Projects should front on the public street and provide pedestrian access from the street.</p> <p>Guideline. Provide safe routes between and through the interior of the developments. Routes should be; separated from vehicular traffic, and distinguished by paving, slopes, landscaping, retail uses, public events, food sales, public art, sitting areas and adequate lighting.</p> <p>Guideline. Incorporated handicapped access into design.</p> <p>Guideline. Link project pedestrian areas to community open space network.</p>	
<p>Noise</p> <p>Guideline. Separate development from freeways and busy roads through walls and/or landscaped berms. Wall design should incorporate landscaping materials and sculptural forms.</p> <p>Guideline. Buffer residential development from noise with setbacks or elevation differences.</p>	
<p>Water</p> <p>Guideline. Public and private developments should use recycled water and install water saving devices, where practical.</p>	
<p>Consistent – The project would be setback from the I-8 freeway. As discussed in Section 5.7, <i>Noise</i>, interior noise levels would exceed City of San Diego General Plan Noise Compatibility Guidelines requirements of 45 dBA CNEL. To avoid a potential land use impact, as a condition of project approval, an interior noise analysis would be required to be approved by the City’s Development Services Department upon application for a building permit. The interior noise analysis would identify sound transmission loss requirements for building façade elements (windows, walls, doors, and exterior wall assemblies) necessary to limit the interior noise to 45 dBA CNEL in habitable residential rooms. Upgraded windows and/or doors with sound transmission class (STC) ratings of 35 or higher may be necessary. If the interior 45 dBA CNEL limit can be achieved only with the windows closed, the residence design must include mechanical ventilation that meets applicable CBC requirements. The project would result in a less than significant interior noise impact with project features incorporated in accordance with the interior noise analysis.</p>	<p>Consistent – The project would be designed and developed utilizing sustainable development practices, which would be in compliance with these Guidelines. The project would incorporate low-flow water fixtures, high-efficiency toilets,</p>

<p>Guideline. Control Surface runoff by promptly planting disturbed sites with ground cover vegetation, and incorporating sedimentation ponds into flood control or runoff control facilities. Long term maintenance for all vegetation should be provided.</p> <p>Guideline. Preserve water by utilizing native, drought resistant vegetation for project landscaping in a manner consistent with the adopted city-wide landscape regulations.</p> <p>Guideline. Use water from the City's water reclamation project for irrigation.</p> <p>Guideline. Implement Department of Water Resources conservation and reclamation recommendations in development projects.</p>	<p>high-efficiency irrigation system, and drought tolerant landscaping. Although, there is no reclaimed water connection available in this locale, the project would be piped so that recycle water may be utilized when available. Disturbed sites would be promptly planted with vegetation and long-term maintenance of all vegetation would be provided. The project proposes a mix of native, native-friendly, and drought tolerant landscaping, consistent with City-wide landscape regulations. The project implements appropriate water conservation measures to ensure that water use is not excessive.</p>
<p>Energy</p> <p>Guideline. Cluster buildings to use a common heating/cooling source.</p> <p>Guideline. Design buildings to allow for flow-through ventilation.</p> <p>Guideline. Use building materials which will act as insulators or conductors, depending on energy needs.</p> <p>Guideline. Use architecture, materials and site planning to minimize energy use to maximize use of solar energy and to avoid casting shadows on existing buildings and public plazas. New structures should be designed so that no more than 50 percent of the areas of a sidewalk, existing buildings, or public plaza should be shaded by the new structure for more than one hour between 11. AM and 2 PM to the extent feasible.</p>	<p>Consistent – Project buildings have been designed to allow flow-through ventilation through the placing of the amenity areas and public plaza, as well as pedestrian paths. The project would be constructed with sustainable design features including LEED for Homes Silver Certification, ENERGYSTAR window and kitchen appliances, energy efficient air conditioning and heating, energy efficient lighting, programmable thermostats, eco-friendly construction materials and finishes, and would be compliant with Title 24. Solar panels would be provided on the roofs of all project buildings.</p> <p>The project includes low- to mid-rise structures up to five stories. As such, buildings would not cast long shadows and would not result in lengthy periods of shading on sidewalks and existing buildings. The project's public plaza would not be shaded by project buildings or adjacent existing buildings.</p>
<p>Cultural and Heritage Resources</p> <p>Guidelines. During the environmental review process identify all archaeological, historical geological and paleontological sites and artifacts. Significant resources should be protected, preserved or salvaged.</p>	<p>Consistent – As discussed in Section 5.8, <i>Historical Resources</i>, of this EIR, the project would involve the demolition of the existing structures on the site. Structures on the property were constructed in 1973 and meet the age threshold for eligibility under the City's regulations for listing on the California Register of Historic Resources. However, the project site does not meet local criteria as an individually significant resource under the adopted Historic Resources Board Criteria. No potentially significant structures are present on the property.</p> <p>Although no historical resources were identified within the boundaries of the project site, recorded sites have been identified within proximity to the project site. Due to the sensitivity of the area, potentially significant impacts to unknown subsurface archeological resources could result during ground-disturbing activities. In order to mitigate potential impacts to unknown subsurface archaeological resources, archaeological monitoring would be required in areas of the project site not impacted by the construction of the existing building, such as the landscaped areas and parking lots surrounding the existing building.</p>

Landmarks	
<p>Guideline. Provide view corridors to identified community landmarks through conditions of approval in specific plans and planned development permits.</p> <p>Guideline. New development should complement and respect views of landmarks and community entrance areas. The freeways in particular are gateways which should provide a clear view into and through the community. New development located in community entrance areas should be designed to enhance these areas and should be reviewed for architectural style, building mass, landscaping and color.</p> <p>Guideline. New developments may create landmarks through the development of vertical building elements.</p>	<p>Consistent – Figure 5.1-3, <i>Mission Valley Community Plan Urban Design – Landmarks and Community Entrances</i>, shows the landmarks and community entrances and their relationship to the project. As shown in Figure 5.1-3, the project site is within a landmark/view sensitive area. The Mission Valley Community Plan describes the many gateways, or entrances, into the community as a type of landmark, where development should provide a clear view into, as well as through, the community. The project has been designed to be sensitive to community views. Buildings would step back and view openings through the project have been provided in the north corner, western border, and along the internal drive aisle to allow views into the Mission Valley community.</p> <p>The project is located along Camino de la Reina, a designated gateway to the community. The stretch of Camino de la Reina from Hotel Circle to Qualcomm Way is emerging as Mission Valley's Main Street, with an increasingly vibrant mix of residential, commercial, and employment uses as redevelopment occurs in a complementary manner to the current land uses. The portion of Camino de la Reina within the vicinity of the project site includes multi-family residential developments, commercial retail centers, and office uses, which provide enhanced landscaping and sidewalk treatments and 24-hour life that create the Main Street feel in this area. The project would locate the commercial components to address Camino de la Reina, reinforcing this Main Street character.</p>
Signage	
<p>Guideline. Signs and street graphics should complement the overall urban design goals for the community.</p> <p>Guideline. Signage for adjacent developments should be compatible and not attempt to "out-shout" each other.</p> <p>Guideline. Signage should complement the architectural design of buildings and developments.</p>	<p>Consistent – Signage for the project would be in compliance with the City's Sign Regulations. Project signage would be compatible to that of neighboring Millennium Mission Valley and would complement the architectural design of buildings and developments.</p>

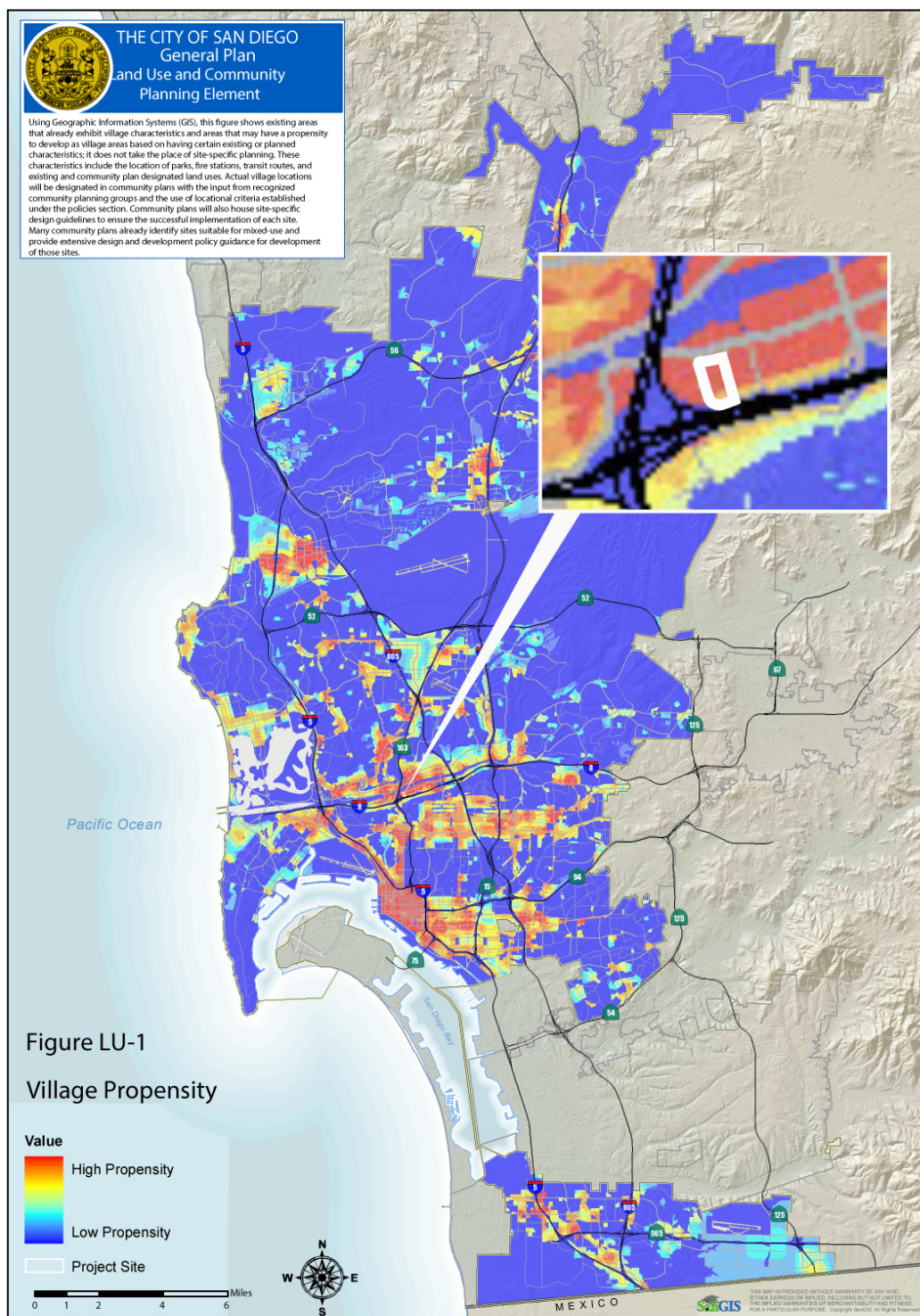


Figure 5.1-1. City of San Diego General Plan Village Propensity Map

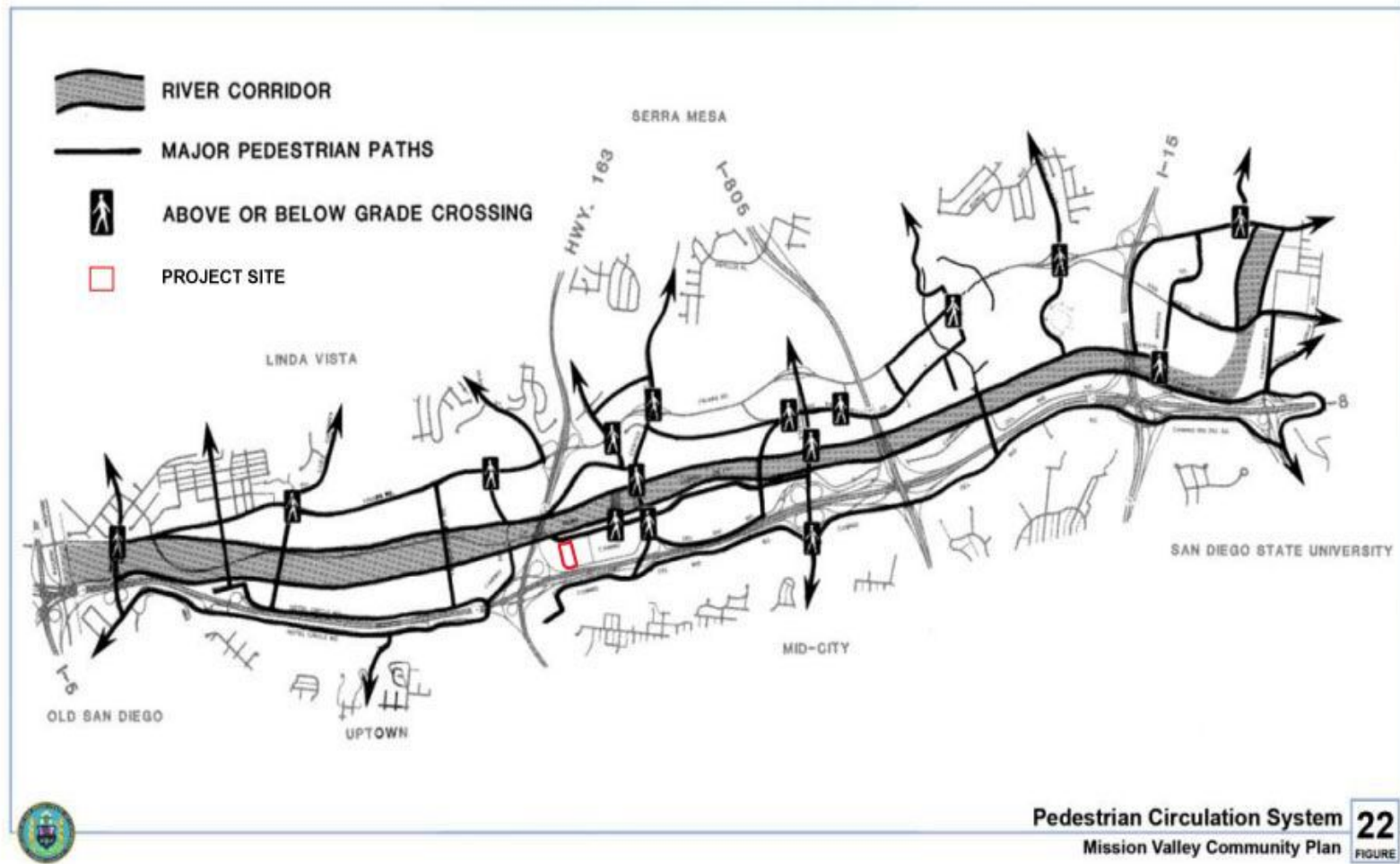


Figure 5.1-2. Mission Valley Community Plan – Pedestrian Circulation System

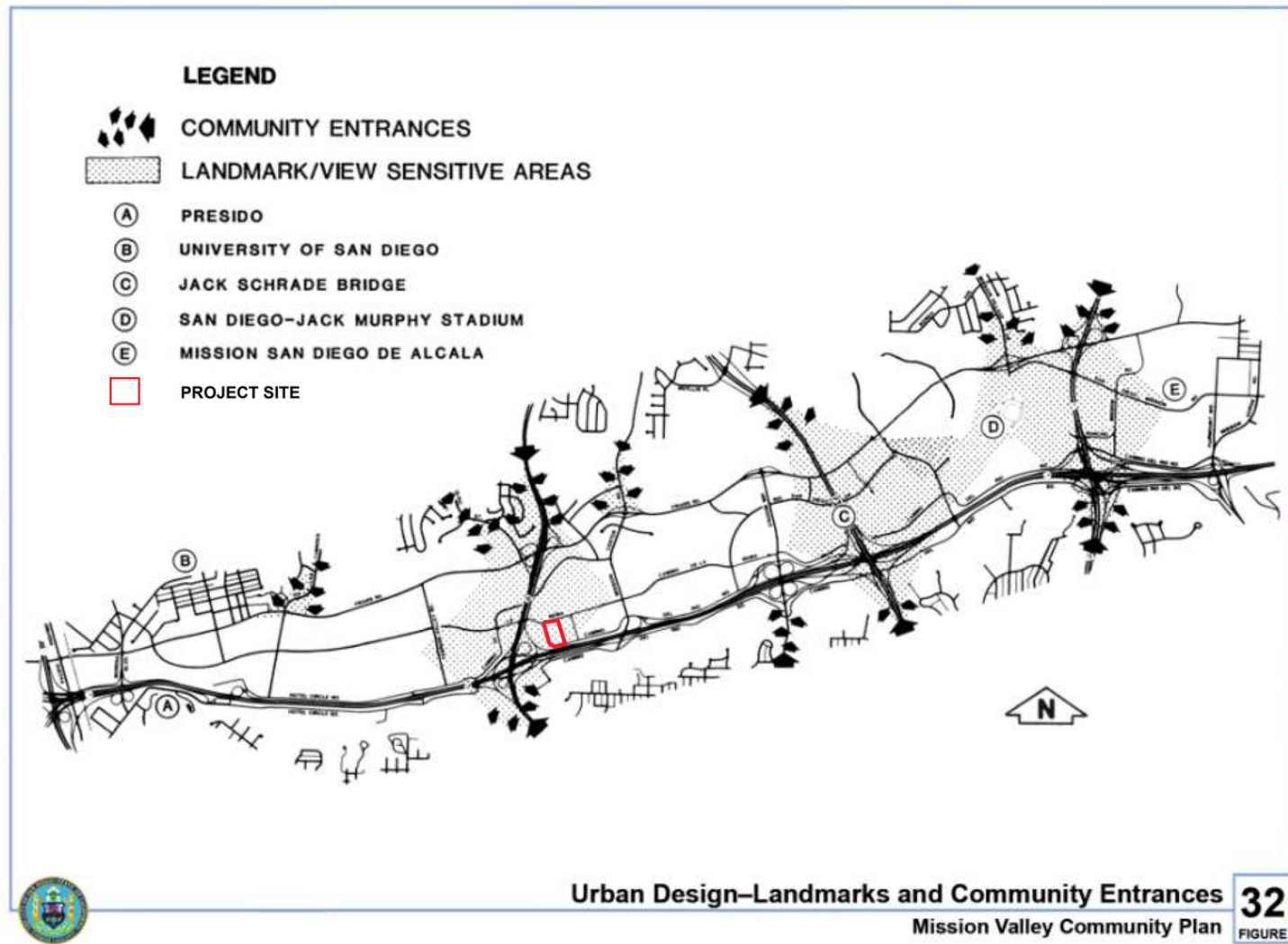


Figure 5.1-3. Mission Valley Community Plan – Urban Design Landmarks and Community Entrances

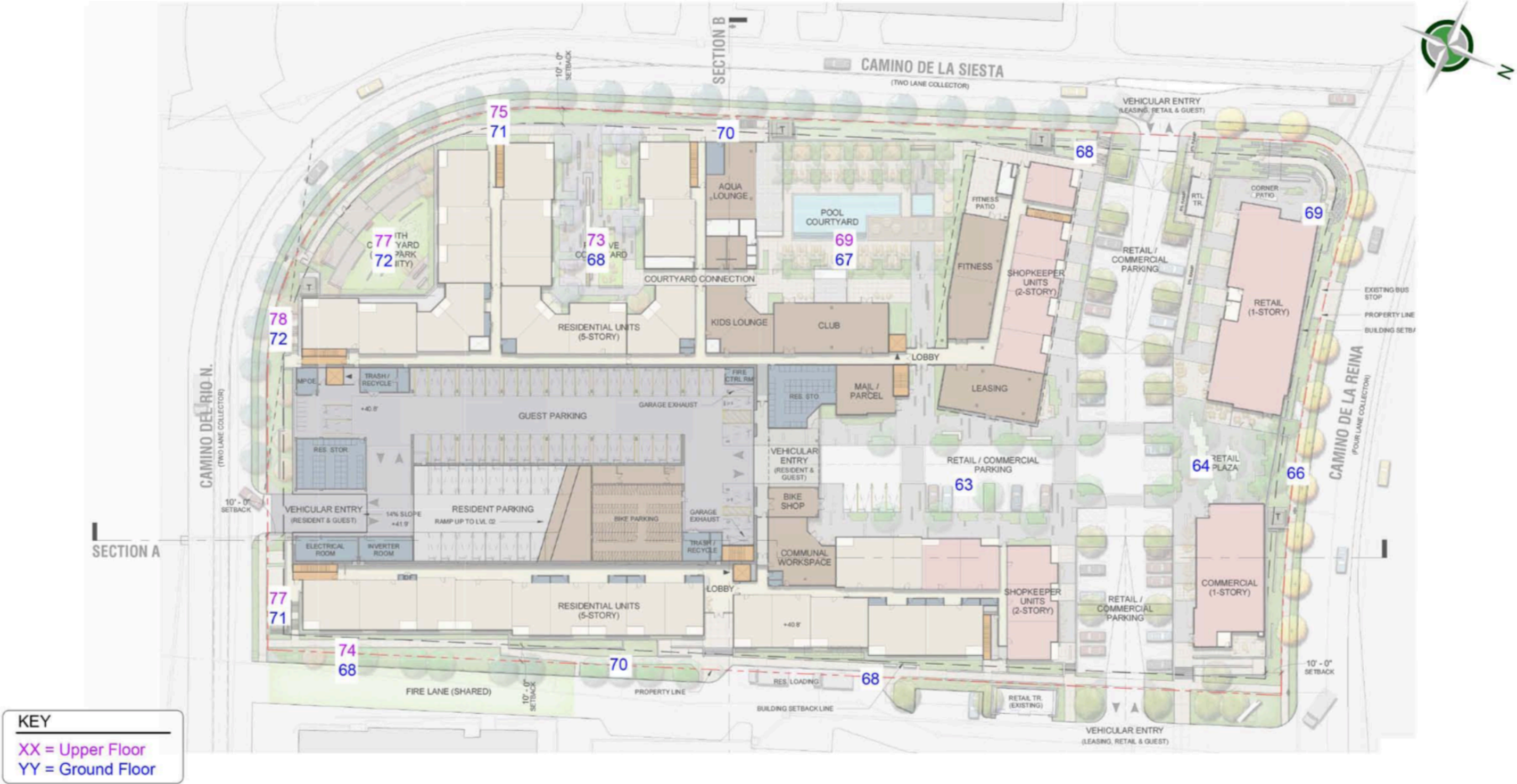


Figure 5.1-4. Future Exterior Noise Levels (CNEL)

5.2 Transportation/Circulation

This section evaluates potential traffic-related impacts associated with the project. The following discussion is based on the *Focused Transportation Study* prepared by Urban Systems Associates, Inc. (USAI) (February, 12, 2018), included as Appendix D.

5.2.1 Existing Conditions

The project site is located between Camino del Rio North and Camino de la Reina, just east of Camino de la Siesta in the Mission Valley community of the City of San Diego (Figure 2-2, *Vicinity Map*). The site is developed with 38,070 square feet of building space and associated surface parking. Provided below is a description of the local and regional roadways serving the project site and surrounding area.

EXISTING ROADWAY FACILITIES

Camino de la Reina is an east–west four-lane Major arterial that runs from Hotel Circle to Qualcomm Way. A small portion of Camino de la Reina within the study area (beneath SR 163) exists as a two-lane Collector roadway with widening at intersections and no fronting property. The remaining length of Camino de la Reina within the study area functions as a four-lane Major arterial with a raised median. The ultimate classification for Camino de la Reina within the Mission Valley Community Plan is a four-lane Major arterial. Parking is permitted along much of Camino de la Reina with the exception of the two-lane portion. The posted speed limit is 35 miles per hour (mph). There is no bike lane on Camino de la Reina within the study area.

Camino de la Siesta is a north-south two-lane Collector road from Camino de la Reina to Camino del Rio North within the study area. Camino de la Siesta acts as a northbound extension of Camino del Rio North and ends at Camino de la Reina with a designated left turn pocket and a shared right turn. Parallel parking is permitted along this segment excluding red curb near driveways and the intersection. The posted speed limit is 25 mph. There is no bike lane along Camino de la Siesta.

Camino del Rio North is an east–west roadway from the I-8 westbound on-ramps to Camino de la Siesta within the study area. Camino del Rio North functions as a four-lane Collector between the I-8 ramps and Mission Center Road and a two-lane Collector with a two-way left turn lane west of Mission Center Road to Camino del Arroyo. The Mission Valley Community Plan identifies the ultimate classification for this roadway as four-lane Major arterial from the I-8 westbound on-ramp to Mission Center Road and either a three- or two-lane Collector along the remaining portion within the study area. Parking is prohibited along the four-lane stretch of Camino del Rio North and permitted elsewhere. The posted speed limit is 30 mph. There are no bike lanes along Camino del Rio North.

Camino del Arroyo is a north–south roadway connecting Camino de la Reina with Camino del Rio North within the study area. Camino del Arroyo functions as a two-lane Collector. Parking is allowed along the road. Camino del Arroyo is unclassified according to the Mission Valley Community Plan. The speed limit on Camino del Arroyo is 25 mph. There are no bike lanes along Camino Del Arroyo.

EXISTING TRANSIT

Existing transit is located in the project area. The project site is directly served by bus, and there is a bus stop for Route 6 located at the project site along Camino de la Reina. Route 6 travels on Camino de la Reina along the project frontage and connects the project site with Westfield Mission Valley Mall and Fashion Valley Mall and Transit Center, as well as to North Park. The route is active Monday through Friday at approximately 15-minute

intervals. The route is also active on Saturday and Sunday at lesser and varying intervals. The project site is located within a 0.5-mile straight line or 0.7-mile walking distance from the Fashion Valley Transit Center, and approximately 0.3-mile straight line distance or 0.7-mile walking distance to the trolley stop at Hazard Center Station.

EXISTING PEDESTRIAN/BICYCLE NETWORK

For the most part, sidewalks occur on all streets surrounding the project site and within the project area. For Camino del Arroyo, sidewalks occur only on the west side of the street. Along Camino del Rio North, sidewalks occur on the north side of the street. Additionally, a pedestrian/bicycle path is located along portions of the San Diego River, from just east of Qualcomm Way to Dog Beach in Ocean Beach, west of the project site. A Class III bike route, where bicyclists travel within the street right-of-way with vehicles, is located on parts of Camino de la Reina, providing east-west travel through Mission Valley; however, the section of Camino de la Reina fronting the project site has no Class III bike route.

EXISTING INTERSECTION AND SEGMENT TRAFFIC VOLUMES AND LEVELS OF SERVICE

Roadway segment and intersection operating conditions are typically described in terms of “Level of Service” (LOS). LOS is a qualitative measure of a roadway’s or an intersection’s operating performance and the motorists’ perception of roadway performance. LOS is expressed as a letter designation from A to F, with A representing the best operating conditions and F the worst. LOS A represents free-flowing traffic conditions with no restrictions on maneuvering or operating speeds, low traffic volumes, and high speeds; LOS B represents stable flow, more restrictions, and operating speeds beginning to be affected by traffic volume; LOS C represents stable flow, more restrictions, and the point at which maneuverability and speed, motorist comfort, and convenience begin to decline noticeably; LOS D represents conditions approaching unstable flow with traffic volumes that profoundly affect arterials; LOS E represents unstable flow and some stoppages; LOS F represents forced flow, many stoppages, and low operating speeds. The acceptable LOS for roadways in San Diego is LOS D.

While roadway LOS based on daily traffic volumes is useful in describing traffic operating conditions, roadway performance is most often controlled by the performance of intersections and, more specifically, intersection performance during peak traffic periods. Intersection performance is important because traffic control at intersections interrupts traffic flow, which would otherwise be relatively unimpeded (except for the influences of on-street parking, access to adjacent uses, or other factors, which result in interaction among vehicles between controlled intersections).

Figure 5.2-1, *Existing Average Daily Traffic*, shows the existing average weekday 24-hour traffic volumes for street segments in the project study area. As shown in Table 5.2-1, *Existing Street Segment Levels of Service*, all street segments are projected to operate at an acceptable LOS D or better in the existing condition.

Table 5.2-1. Existing Street Segment Levels of Service

Road	Segment	Standard	# of Ln.	Class.	Cap.	Volume	V/C	LOS
Camino de la Reina	From Camino de la Siesta to Camino del Arroyo	SD	4	4-M	40,000	12,430	0.31	A
Camino de la Siesta	From Camino de la Reina to Camino del Rio North	SD	2	2-Cc	8,000	5,124	0.64	D
Camino del Rio North	From Camino de la Siesta to Camino del Arroyo	SD	2	2-Cc	8,000	4,970	0.62	C

Legend:

Class. = Functional Classification

Cap. = Capacity

LOS = Level of Service

2-Cc = 2 Lane Collector (w/commercial-industrial property)

4-M = 4 Lane Major Arterial

The analysis of peak hour intersection performance was conducted based on the 2010 Highway Capacity Manual (HCM) using operational analysis procedures. A computer program (Synchro), which is based on the HCM, was used to complete the analysis. As shown on Table 5.2-2, *Existing Intersection Levels of Service*, all intersections currently operate at a LOS D or better during the AM and PM peak hour periods.

Table 5.2-2. Existing Intersection Levels of Service

Intersection	Control	AM Peak Hour		PM Peak Hour	
		Delay	LOS	Delay	LOS
Camino de la Reina at Camino de la Siesta	Signalized	8.6	A	9.2	A
Camino de la Reina at Camino de la Arroyo	Unsignalized	9.1	A	12.0	B
Camino del Rio North at Camino del Arroyo	Unsignalized	10.0	A	10.8	B

Notes:

LOS = Level of Service

5.2.2 Impact Analysis

The project would demolish 38,070 square feet of existing commercial structures and construct 277 multi-dwelling units, 3,600 square feet of commercial office, 2,500 square feet of specialty retail, and 3,500 square feet of high-turnover sit-down restaurant (these categories were used for the purpose of trip analysis). Ten of the proposed residential units would be “shopkeeper” units, which are designed to optimize residents’ ability to work from home. This configuration is expected to primarily serve residents who wish to work out of their residence in a way that tends to reduce trip generation from what is discussed below.

Access for the project is planned via driveways on Camino del Rio North and Camino de la Siesta. A fire lane on the east side of the property would provide emergency access from both Camino del Rio North and Camino de la Reina.

The Focused Transportation Study examines the effects of the project on the existing and planned circulation system based on development of the project and build-out of the community. The study area for the project includes existing intersections and street segments. The following street segments were analyzed as part of the Focused Transportation Study:

- Camino de la Reina from Camino de la Siesta to Camino del Arroyo
- Camino de la Siesta from Camino de la Reina to Camino del Rio North
- Camino del Rio North from Camino de la Siesta to Camino del Arroyo

The following intersections were also analyzed as part of the Focused Transportation Study:

- Camino de la Reina at Camino de la Siesta
- Camino de la Reina at Camino de la Arroyo
- Camino de la Arroyo at Camino del Rio North

The Focused Transportation Study evaluates existing conditions (based on current street improvements and operations), Existing with Project conditions, Near Term without Project Conditions, Near Term with Project Conditions, Horizon Year 2035 without Project, and Horizon Year 2035 with Project. The term “Horizon Year 2035” is meant to discuss traffic conditions to the Year 2035. Traffic volumes for the Horizon Year 2035 conditions are based on A SANDAG Series 12 Year 2035 traffic model.

The Focused Transportation Study also includes an analysis of transit, parking, and access. That analysis is also presented within this EIR section.

Issue 1

Would the proposal result in a substantial impact upon existing or planned transportation systems?

Issue 2

Would the project result in traffic generation in excess of specific community plan allocation?

Issue 3

Would the project result in an increase in projected traffic which is substantial in relation to the existing traffic load and capacity of the street system?

Issue 4

Would the project result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp?

Impact Thresholds:

- If any intersection, roadway segment, or freeway segment affected by a project would operate at LOS E or F under either direct or cumulative conditions, the impact would be significant if the project exceeds the thresholds shown in the table below.
- At any ramp meter location with delays above 15 minutes, the impact would be significant if the project exceeds the thresholds shown in the table below.
- If a project would add a substantial amount of traffic to a congested freeway segment, interchange, or ramp, the impact may be significant.
- If a project would result in the construction of a roadway which is inconsistent with the General Plan and/or a community plan, the impact would be significant if the proposed roadway would not properly align with other existing or planned roadways.

Impact Analysis**PROJECT TRIP GENERATION**

As shown in Table 5.2-3, *Witt Mission Valley Project Trip Generation*, the existing development generates a total of 1,373 ADT with 79 (55 inbound and 24 outbound) morning (AM) peak hour trips and 120 (48 inbound and 72 outbound) afternoon (PM) peak hour trips. The project is expected to generate 1,954 ADT, with 164 (54 inbound and 110 outbound) AM peak hour trips and 182 (115 inbound and 67 outbound) PM peak hour trips. Due to the project's mixed-use nature and proximity to transit, a Mixed-Use Development (MXD) credit has been applied to the analysis. This credit is based on the results of a SANDAG "MXD model," which estimates the amount of traffic that is reduced by walkable features, mixed-use development, and transit integration. The Mission Valley community is well-served by transit and has significant pedestrian and bicycle options, resulting in a reduction of overall traffic compared to a typical suburban community.

Table 5.2-3. Witt Mission Valley Project Trip Generation

Land Use	Intensity	Rate*	ADT	AM Peak Hour					PM Peak Hour				
				Peak %	Vol.	In%:Out%	In	Out	Peak %	Vol.	In%:Out%	In	Out
Proposed Project													
Multiple Dwelling Units	277	6/unit	1,662	8%	133	20%:80%	27	106	9%	150	70%:30%	105	45
Commercial Office	3600	Formula	137	13%	18	90%:10%	16	2	14%	19	20%:80%	4	15
Specialty Retail Center/ Strip Commercial	2.5/KSF	40/KSF	100	3%	3	60%:40%	2	1	9%	-9	50%:50%	5	5
High Turnover (sit-down) Restaurant	3.5/KSF	130/KSF	455	8%	36	50%:50%	18	18	8%	36	60%:40%	22	15
PROPOSED SUB TOTAL			2,354		190		63	127		214		136	80
MXD CREDIT %			17%		14%		14%	14%		15%		15%	15%
MXD CREDIT			400		27		9	18		32		20	12
SUBTOTAL (with MXD Credit)			1,954		163		54	109		182		116	68
Existing Land Uses													
Car Dealer	20.4/KSF	50/KSF	1,019	5%	51	70%:30%	36	15	8%	82	40%:60%	33	49
Repair Shop	17.7/KSF	20/KSF	354	8%	28	70%:30%	20	8	11%	39	40%:60%	16	23
Existing SUBTOTAL			1,373		79		55	24		120		48	72
NET TOTAL (MXD-EXISTING)			581		84		0**	85		62		68	0**

Source:

*Rates taken from City of San Diego Trip Generation manual, May 2003

** Negative values have been adjusted to zero (0)

Note:

ADT = Average Daily Trips

KSF = 1,000 square feet

Density = 54 units per acre

As described above, the existing 38,070 square foot commercial use would be demolished as part of this project and is estimated to generate 1,373 ADT, with 79 AM and 120 PM peak hour trips. After the transit, mixed-use, and existing land use credits are applied, the net new trips generated by the project would be 581 ADT, with 84 (-2 inbound and 86 outbound) AM peak hour trips and 62 (67 inbound and -5 outbound) PM peak hour trips.

Chapter 15, Article 14 of the City of San Diego, Municipal Code establishes rules for the Mission Valley PDO. The proposed project is located within Development Intensity District G. Within this district, the MVPDO limits development as follows: "Development intensity shall be limited by the number of average daily trips (ADT) generated by the existing and proposed land uses of any development proposal" (§1514.0301(c)(1)). According to Table 1514-03A in the MVPDO, up to 344 ADT per gross acre are allowed within Development Threshold 2. For the 5.13-acre project site, the Community Plan would allow up to 1,765 ADT within the allowable development thresholds. The MVPDO establishes trip rates based on equivalent dwelling units similar to the trip rates previously presented but slightly different (6 trips/unit for Multiple Dwelling Units, 20 trips/KSF for Commercial Office, 40 trips/KSF for Specialty Retail Center/Strips Commercial, and 40 trips/KSF for High Turnover (sit-down) Restaurant). Based on these trip rates, the project would generate 1,638 ADT, taking into account a MXD credit. Therefore, the

project would be within the Threshold 2 limits established by the MVPDO.

PROJECT TRIP DISTRIBUTION AND ASSIGNMENT

Project-only trip distribution percentages are shown in Figure 5.2-2, *Project Only Trip Distribution Percentages*. As shown in Figure 5.2-2, project traffic would distribute 17 percent to the west and 83 percent to the east on Camino de la Reina and Camino del Rio North. Figure 5.2-3, *Project Only Average Daily Traffic*, shows the project-only average daily traffic volumes, which are based on the daily net new traffic generation from Table 5.2-3 and distribution of project-only traffic from Figure 5.2-2.

EXISTING WITH PROJECT CONDITIONS

This section evaluates the impacts of the Existing with Project analysis. This analysis evaluates the project's direct impacts by comparing existing conditions without the project to existing conditions with the project.

Street Segments

Street segments LOS with project traffic was determined by adding expected project-only daily volumes to the counted existing daily volumes. Figure 5.2-4, *Existing with Project Average Daily Traffic*, shows the Existing with Project ADT volumes. Table 5.2-4, *Existing with Project Street Segment Levels of Service*, shows street segment LOS with the addition of the project traffic. As shown, all study area street segments are anticipated to operate at an acceptable LOS D or better.

Table 5.2-4. Existing with Project Street Segment Levels of Service

Road	Segment	Standard	# of Ln.	Class.	Cap.	Volume	V/C	LOS
Camino de la Reina	From Camino de la Siesta to Camino del Arroyo	SD	4	4-M	40,000	12,640	0.32	A
Camino de la Siesta	From Camino de la Reina to Camino del Rio North	SD	2	2-Cc	8,000	5,434	0.68	D
Camino del Rio North	From Camino de la Siesta to Camino del Arroyo	SD	2	2-Cc	8,000	5,244	0.66	D

Legend:

Class. = Functional Classification

Cap. = Capacity

LOS = Level of Service

2-Cc = 2 Lane Collector (with commercial-industrial property)

4-M = 4 Lane Major Arterial

Intersections

Project traffic for the AM and PM peak hours was added to existing traffic. Intersection delays and LOS for the Existing with Project peak hour traffic are provided in Table 5.2-5, *Existing with Project Intersection Levels of Service*. As shown, all study intersections operate at acceptable LOS D or better in both the AM and PM peak hour setting.

Table 5.2-5. Existing with Project Intersection Levels of Service

Intersection	Control	AM Peak Hour		PM Peak Hour	
		Delay	LOS	Delay	LOS
Camino de la Reina at Camino de la Siesta	Signalized	8.8	A	9.8	A
Camino de la Reina at Camino de la Arroyo	Unsignalized	9.2	A	12	B
Camino del Rio North at Camino del Arroyo	Unsignalized	10.1	B	10.9	B

Notes:

Delay = Second per Vehicle

LOS = Level of Service

OTHER PROJECTS

To find Other Project volumes, the Focused Transportation Study included volumes from approved projects that are expected to have impacts within the project study area. These “other projects” are added to existing traffic in order to determine “cumulative impacts” as required by CEQA. According to CEQA, a list of “past, present and probable future projects” should be used to determine cumulative project conditions. There are two reasonably foreseeable projects that may have traffic impacts within the project study area. The two projects are the Camino Del Rio Mixed-Use project, located adjacent to the project site at 730 Camino del Rio North, and the Alexan Fashion Valley project, located just west of the project site at 123 Camino de la Reina. Figure 5.2-5, *Other Project Average Daily Traffic*, shows the other project’s average daily traffic volumes when added to existing traffic.

Although there are other active projects in the Mission Valley area, including Civita, Town and Country, Legacy International Center, and Riverwalk, an exploration of the proposed opening day and study area of those projects indicates that they will have little or no effect on the study area in the Near Term. (For a detailed description of these “other projects”, see Section 6.0, *Cumulative Effects*, of this EIR. The Witt Mission Valley project is expected to have an opening day in Year 2020. Due to the complexity of projects such as Riverwalk, they are expected to have a later opening day. Projects such as Town and Country and Legacy International Center are not expected to generate significant new trips, and projects such as Civita have a relatively small influence in the study area. One final “other project” explored is the Union-Tribune project, which is undergoing project revision at the time of this analysis. No significant additional traffic from the Union-Tribune site is anticipated in the immediate short-term. Development of Mission Valley consistent with regional plans is anticipated in future years and is included in the Long-Term analysis pursuant to the SANDAG regional travel forecast model.

NEAR TERM

This section evaluates street segments and intersections within the project’s study area in the Near Term 2020 condition.

Street Segments

Average daily traffic volumes from “other projects” expected to be completed prior to the project added to existing average daily traffic volumes are shown in Figure 5.2-6, *Near Term Average Daily Traffic*. Table 5.2-6, *Near Term Street Segment Levels of Service*, shows street segment LOS without project traffic. As shown in Table 5.2-6, all study street segments are anticipated to operate at an acceptable LOS D or better.

Table 5.2-6. Near Term Project Street Segment Levels of Service

<i>Road</i>	<i>Segment</i>	<i>Standard</i>	<i># of Ln.</i>	<i>Class.</i>	<i>Cap.</i>	<i>Volume</i>	<i>V/C</i>	<i>LOS</i>
Camino de la Reina	From Camino de la Siesta to Camino del Arroyo	SD	4	4-M	40,000	12,808	0.32	A
Camino de la Siesta	From Camino de la Reina to Camino del Rio North	SD	2	2-Cc	8,000	5,138	0.64	D
Camino del Rio North	From Camino de la Siesta to Camino del Arroyo	SD	2	2-Cc	8,000	4,984	0.62	C

Legend:

Class. = Functional Classification

Cap. = Capacity

LOS = Level of Service

2-Cc = 2 Lane Collector (with commercial-industrial property)

4-M = 4 Lane Major Arterial

Intersections

The peak hour traffic volumes from the “other projects” expected to be completed prior to the project are shown in Table 5.2-7, *Near Term without Project Intersection Levels of Service*. As shown in Table 5.2-7, all study intersections currently operate at an acceptable LOS D or better in both the AM and PM peak hour setting.

Table 5.2-7. Near Term without Project Intersection Levels of Service

<i>Intersection</i>	<i>Control</i>	<i>AM Peak Hour</i>		<i>PM Peak Hour</i>	
		<i>Delay</i>	<i>LOS</i>	<i>Delay</i>	<i>LOS</i>
Camino de la Reina at Camino de la Siesta	Signalized	8.6	A	9.3	A
Camino de la Reina at Camino de la Arroyo	Unsignalized	10.4	B	15.3	C
Camino del Rio North at Camino del Arroyo	Unsignalized	10.3	B	11.3	B

Notes:

Delay = seconds per vehicle

LOS = Level of Service

NEAR TERM WITH PROJECT

This section evaluates the Near Term with Project traffic conditions by adding the “other projects” expected to be completed prior to the project plus project traffic to existing volumes. These traffic volumes are then used to evaluate project traffic impacts. No road network changes were assumed for this condition compared to the existing condition.

Street Segments

Average daily traffic volumes with project traffic added to existing plus “other projects” that are expected to be completed prior to the project’s opening day, are shown in Figure 5.2-7, *Near Term with Project Average Daily Traffic*. Table 5.2-8, *Near Term with Project Street Segment Levels of Service*, shows street segment levels of service with project traffic. As shown in Table 5.2-8, all study street segments are anticipated to operate at an acceptable LOS D or better.

Table 5.2-8. Near Term with Project Street Segment Levels of Service

<i>Road</i>	<i>Segment</i>	<i>Standard</i>	<i># of Ln.</i>	<i>Class.</i>	<i>Cap.</i>	<i>Volume</i>	<i>V/C</i>	<i>LOS</i>
Camino de la Reina	From Camino de la Siesta to Camino del Arroyo	SD	4	4-M	40,000	13,018	0.33	A
Camino de la Siesta	From Camino de la Reina to Camino del Rio North	SD	2	2-Cc	8,000	5,448	0.68	D
Camino del Rio North	From Camino de la Siesta to Camino del Arroyo	SD	2	2-Cc	8,000	5,258	0.66	D

Legend:

Class. = Functional Classification

Cap. = Capacity

LOS = Level of Service

2-Cc = 2 Lane Collector (with commercial-industrial property)

4-M = 4 Lane Major Arterial

Intersections

Near Term plus “other projects” expected to be completed by opening day plus project combined traffic volumes during AM/PM peak hours at study area intersections are shown in Table 5.2-9, *Near Term with Project Intersection Levels of Service*. As shown in Table 5.2-9, all study intersections currently operate at acceptable LOS D or better in both the AM and PM peak hour setting.

Table 5.2-9. Near Term with Project Intersection Levels of Service

<i>Intersection</i>	<i>Control</i>	<i>AM Peak Hour</i>		<i>PM Peak Hour</i>	
		<i>Delay</i>	<i>LOS</i>	<i>Delay</i>	<i>LOS</i>
Camino de la Reina at Camino de la Siesta	Signalized	8.8	A	9.8	A
Camino de la Reina at Camino de la Arroyo	Unsignalized	10.6	A	15.4	C
Camino del Rio North at Camino del Arroyo	Unsignalized	10.4	B	11.4	B

Notes:

LOS= Level of Service

HORIZON YEAR 2035 WITHOUT PROJECT

Horizon Year 2035 without Project traffic volumes for the Witt Mission Valley project are based on a SANDAG Series 13 Regional Traffic Model.

Street Segments

Average daily traffic volumes from the Horizon Year 2035 without Project scenario are shown in Figure 5.2-8, *Horizon Year 2035 without Project Average Daily Traffic*. Table 5.2-10, *Horizon Year 2035 without Project Street Segment Levels of Service*, shows street segment LOS without project traffic. As shown in the table, all study street segments are anticipated to operate at acceptable LOS D or better.

Table 5.2-10. Horizon Year 2035 without Project Street Segment Levels of Service

Road	Segment	Standard	# of Ln.	Class.	Cap.	Volume	V/C	LOS
Camino de la Reina	From Camino de la Siesta to Camino del Arroyo	SD	4	4-M	40,000	12,808	0.32	A
Camino de la Siesta	From Camino de la Reina to Camino del Rio North	SD	2	2-Cc	8,000	5,138	0.64	D
Camino del Rio North	From Camino de la Siesta to Camino del Arroyo	SD	2	2-Cc	8,000	6,500	0.81	D

Legend:

Class. = Functional Classification

Cap. = Capacity

LOS = Level of Service

2-Cc = 2 Lane Collector (with commercial-industrial property)

4-M = 4 Lane Major Arterial

Notes:

Taken from SANDAG Series 13 Year 2020 traffic model

Intersections

The peak hour traffic volumes from Horizon 2035 without Project scenario were evaluated at study area intersections. Table 5.2-11, *Horizon Year 2035 without Project Intersection Levels of Service*, shows resulting AM and PM peak hour LOS. As shown in Table 5.2-11, all study intersections currently operate at an acceptable LOS D or better in both the AM and PM peak hour setting.

Table 5.2-11. Horizon Year 2035 without Project Intersection Levels of Service

Intersection	Control	AM Peak Hour		PM Peak Hour	
		Delay	LOS	Delay	LOS
Camino de la Reina at Camino de la Siesta	Signalized	8.6	A	9.3	A
Camino de la Reina at Camino de la Arroyo	Unsignalized	9.1	A	12.0	B
Camino del Rio North at Camino del Arroyo	Unsignalized	10.5	B	10.9	B

Notes:

LOS= Level of Service

HORIZON YEAR 2035 WITH PROJECT

This section evaluates street segments and intersections within the project's study area in the Horizon Year 2035 with Project condition.

Street Segments

Horizon Year 2035 with project traffic added volumes are shown in Figure 5.2-9, *Horizon Year 2035 with Project Average Daily Traffic*. Table 5.2-12, *Horizon Year 2035 with Project Street Segment Levels of Service*, shows street segment levels of service with project traffic. As shown in Table 5.2-12, all study segments are anticipated to operate at an acceptable LOS D or better except for the following segment:

- Camino del Rio North (from Camino de la Siesta to Camino del Arroyo)

Table 5.2-12. Horizon Year 2035 with Project Street Segment Levels of Service

Road	Segment	Standard	# of Ln.	Class.	Cap.	Volume	V/C	LOS
Camino de la Reina	From Camino de la Siesta to Camino del Arroyo	SD	4	4-M	40,000	13,018	0.33	A
Camino de la Siesta	From Camino de la Reina to Camino del Rio North	SD	2	2-Cc	8,000	5,448	0.68	D
Camino del Rio North	From Camino de la Siesta to Camino del Arroyo	SD	2	2-Cc	8,000	6,774	0.85	E

Legend:

Class. = Functional Classification

Cap. = Capacity

LOS = Level of Service

2-Cc = 2 Lane Collector (with commercial-industrial property)

4-M = 4 Lane Major Arterial

Intersections

The peak hour traffic volumes from Horizon 2035 With Project scenario were evaluated at study area intersections. Table 5.2-13, *Horizon Year 2035 with Project Intersection Levels of Service*, shows resulting AM and PM peak hour LOS. As shown in Table 5.2-13, all study intersections would operate at an acceptable LOS D or better in both the AM and PM peak hour setting.

Table 5.2-13. Horizon Year 2035 with Project Intersection Levels of Service

Intersection	Control	AM Peak Hour		PM Peak Hour	
		Delay	LOS	Delay	LOS
Camino de la Reina at Camino de la Siesta	Signalized	8.9	A	9.8	A
Camino de la Reina at Camino de la Arroyo	Unsignalized	9.2	A	12.0	B
Camino del Rio North at Camino del Arroyo	Unsignalized	10.6	B	11.1	B

Notes:

LOS= Level of Service

FREEWAY SEGMENTS

Relative to Issue 4, the project would not result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or metered freeway ramp. The study area for the project's traffic study is based on criteria and threshold established in the City of San Diego Traffic Impact Study Manual and SANDAG's Congestion Management Program. Based on these thresholds, no freeway segments or metered freeway on ramps were included in this study area. Therefore, no evaluation of freeway segments or metered freeway on-ramps was completed.

Summary of Impacts

As shown in Table 5.2-12, *Horizon Year 2035 with Project Street Segment Levels of Service*, the proposed project would result in a cumulatively significant impact at the segment of Camino del Rio North from Camino de la Siesta to Camino del Arroyo under the Horizon Year plus Project conditions.

The project would not result in any significant impacts to study area intersections.

Significance of Impacts

The project is not expected to cause any significant impacts to street segments in the Existing with Project, Near Term with Project, and Horizon Year 2035 with Project scenarios except for the segment of Camino del Rio North from Camino de la Siesta to Camino del Arroyo under Horizon Year with Project conditions. As shown in Tables 5.2-

14 through 5.2-19, the project would not cause any significant impacts to intersections in the Existing with Project, Near Term with Project, and Horizon Year 2035 with Project scenarios.

Table 5.2-14. Existing with and without Project Street Segment Significance

Road	Segment	# of Lanes	LOS "E" Capacity	Class	Existing			Existing + Project			Δ V/C	Is this impact Significant?
					LOS	Volume	V/C	LOS	Volume	V/C		
Camino de la Reina	From Camino de la Siesta to Camino del Arroyo	4	40,000	2-Cc	A	12,430	0.31	A	12,640	0.32	0.005	NO
Camino de la Siesta	From Camino de la Reina to Camino del Rio North	2	8,000	2-Cc	D	5,124	0.64	D	5,434	0.68	0.039	NO
Camino del Rio North	From Camino de la Siesta to Camino del Arroyo	2	8,000	2-Cc	C	4,970	0.62	D	5,244	0.66	0.034	NO

Legend:

LOS= Level of Service

V/C= Volume to Capacity Ratio

Δ V/C= Change in V/C ratio

2-Cc = 2 Lane Collector (w/ commercial-industrial property)

4-M = 4 Lane Major Arterial

Table 5.2-15. Existing with and without Project Intersection Summary

Intersection	Existing				Existing + Project							
	AM Peak Hour		PM Peak Hour		AM Peak Hour		Δ	S?	PM Peak Hour		Δ	S?
	D	LOS	D	LOS	D	LOS			D	LOS		
Camino de la Reina at Camino de la Siesta	8.6	A	9.2	A	8.8	A	0.2	No	9.8	A	0.6	No
Camino de la Reina at Camino del Arroyo	9.1	A	12	B	9.2	A	0.1	No	12.0	B	0.0	No
Camino del Rio North at Camino del Arroyo	10	A	10.8	B	10.1	B	0.1	No	10.9	B	0.1	No

Notes:

LOS = Level of Service

Δ = Change

S = Significant

D = Delay

Table 5.2-16. Near Term with and without Project Street Segment Significance

Road	Segment	# of Lanes	LOS "E" Capacity	Class	Opening Day (2019)			Opening Day (2018) with Project			Δ V/C	Is this impact Significant?
					LOS	Volume	V/C	LOS	Volume	V/C		
Camino de la Reina	From Camino de la Siesta to Camino del Arroyo	4	40,000	4-M	A	12,808	0.32	A	13,018	0.33	0.005	NO
Camino de la Siesta	From Camino de la Reina to Camino del Rio North	2	8,000	2-Cc	D	5,138	0.64	D	5,448	0.68	0.039	NO
Camino del Rio North	From Camino de la Siesta to Camino del Arroyo	2	8,000	2-Cc	C	4,984	0.62	D	5,258	0.66	0.034	NO

Legend:

LOS= Level of Service

V/C= Volume to Capacity Ratio

Δ V/C= Change in V/C ratio

2-Cc = 2 Lane Collector (w/ commercial-industrial property)

4-M = 4 Lane Major Arterial

Table 5.2-17. Near Term with and without Project Intersection Summary

Intersection	Opening Day (2019)				Opening Day (2019) + Project							
	AM Peak Hour		PM Peak Hour		AM Peak Hour		Δ	S?	PM Peak Hour		Δ	S?
	D	LOS	D	LOS	D	LOS			D	LOS		
Camino de la Reina at Camino de la Siesta	8.6	A	9.3	A	8.8	A	0.2	No	9.8	A	0.5	No
Camino de la Reina at Camino de la Arroyo	10.4	B	15.3	C	10.6	B	0.2	No	15.4	C	0.1	No
Camino del Rio North at Camino del Arroyo	10.3	B	11.3	B	10.4	B	0.1	No	11.4	B	0.1	No

Notes:

LOS = Level of Service

Δ = Change

S = Significant

D = Delay

Table 5.2-18. Horizon Year 2035 with and without Project Street Segment Significance

Road	Segment	# of Ln.	LOS "E" Capacity	Class.	Opening Day (2019)			Opening Day (2018) with Project			Δ V/C	Is this impact Significant?
					LOS	Volume	V/C	LOS	Volume	V/C		
Camino de la Reina	From Camino de la Siesta to Camino del Arroyo	4	40,000	4-M	A	12,808	0.32	A	13,018	0.33	0.005	NO
Camino de la Siesta	From Camino de la Reina to Camino del Rio North	2	8,000	2-Cc	D	5,138	0.64	D	5,448	0.68	0.039	NO
Camino del Rio North	From Camino de la Siesta to Camino del Arroyo	2	8,000	2-Cc	D	6,500	0.81	E	6,774	0.85	0.034	YES

Legend:

LOS= Level of Service

V/C= Volume to Capacity Ratio

ΔV/C= Change in V/C ratio

2-Cc = 2 Lane Collector (w/ commercial-industrial property)

4-M = 4 Lane Major Arterial

Table 5.2-19. Horizon Year 2035 with and without Project Intersection Summary

Intersection	Horizon Year 2035				Horizon Year 2035 + Project							
	AM Peak Hour		PM Peak Hour		AM Peak Hour		Δ	S?	PM Peak Hour		Δ	S?
	D	LOS	D	LOS	D	LOS			D	LOS		
Camino de la Reina at Camino de la Siesta	8.6	A	9.3	A	8.9	A	0.3	No	9.8	A	0.5	No
Camino de la Reina at Camino de la Arroyo	9.1	A	12.0	B	9.2	A	0.1	No	12.0	B	0.0	No
Camino del Rio North at Camino del Arroyo	10.5	B	10.9	B	10.6	B	0.1	No	11.1	B	0.2	No

Notes:

LOS = Level of Service

Δ = Change

S = Significant

D = Delay

Mitigation Measures

The following mitigation measure would be implemented to reduce the project's impact to street segments:

- MM 5.2-1** **Camino del Rio North from Camino de la Siesta to Camino del Arroyo** – Prior to issuance of the first building permit, the owner permittee shall assure by permit and bond the construction of a two-way left turn lane on Camino del Rio North from Camino del Arroyo to Camino de la Siesta to the satisfaction of the City Engineer and construction should be complete and accepted by the City prior to the issuance of the first certificate of occupancy. This improvement would provide adequate storage for vehicles wishing to access the project and increase overall segment capacity.

Significance of Impacts Following Implementation of Mitigation Measures

Following implementation of mitigation measure MM 5.2-1, above, the project's cumulative impact to street segments would be mitigated to below a level of significance.

Issue 5

Would the proposal result in an increase in traffic hazards for motor vehicles, bicyclists or pedestrians due to a proposed, non-standard design feature (e.g., poor sight distance or driveway onto an access-restricted roadway)?

Impact Threshold:

- If a project would increase traffic hazards to motor vehicles, bicyclists, or pedestrians due to proposed non-standard design features (e.g., poor sight distance, proposed driveway onto an access-restricted roadway), the impact would be significant.

Impact Analysis

The project would provide site access in a design that is safe for all users. On-site vehicular circulation would be accommodated by two driveways into a parking garage for the residential portion of the project. Additional circulation for the retail portion of the project would be accomplished through a private drive parallel to Camino de la Reina and east of Camino de la Siesta mid-block between Camino del Rio North and Camino de la Reina. This private drive would primarily serve retail tenants, visitors, and guests. There would be limited on-street parking on the new private drive.

Pedestrian circulation for the project would be accommodated through internal walkways within the project, as well as non-contiguous sidewalks on the surrounding segments. (See Figure 3-3, *Access and Open Space Diagram*). Pedestrian access would be provided through sidewalks on Camino de la Reina, Camino del Arroyo, and Camino del Rio North. Project sidewalks would connect to sidewalks on the public streets, which would allow access to transit and adjacent retail services, offices, and multi-family residential development. From the project, pedestrians could utilize sidewalks on Camino de la Reina, Camino del Arroyo, and Camino del Rio North to reach the rest of the community. A crosswalk would be located in the retail parking area, connecting the retail portion of the project to the residential portion of the project in a convenient location.

The on-site circulation and parking aisles configuration have been designed for compatibility with the project's proposed uses and in accordance with City standards. Pedestrian circulation would be clearly identified, with crossings as necessary, to ensure compatibility and safety of all users. Pedestrian access would be provided at project entries with clearly designated paths of travel for pedestrians, as shown in Figure 3-3, *Access and Open Space Diagram*. The project would not result in an increase in traffic hazards for motor vehicles, bicyclists, or pedestrians due to proposed non-standard design features.

As discussed in Section 5.1, *Land Use*, the project would not meet the sidewalk and parkway width requirements of the PDO for Camino de la Reina. The PDO requires a 10-foot sidewalk and eight-foot parkway along Camino de la Reina. Along Camino de la Reina, the project proposes a five-foot wide sidewalk with a five-foot wide parkway (which includes a 4.5-foot landscaped parkway and six-inch curb), which is not in direct compliance with Table 1514-04A of the PDO. The project would not meet the sidewalk width requirements for Camino de la Siesta and Camino del Rio North. For both streets, the PDO requires a six-foot sidewalk and five-foot parkway. Along these streets, the project proposes five-foot wide sidewalks, which is not in compliance with Table 1514-04A of the PDO.

The project proposes a deviation from the requirements along Camino de la Reina, ~~Camino de la Siesta, and Camino del Rio North~~ to allow for development that addresses the street and allows for pedestrian-scale project features. Specifically, the project proposes commercial buildings along Camino de la Reina, an open plaza, outdoor seating, and a grand staircase connected to the public sidewalk to access the commercial buildings and plaza area. ~~The project proposes two courtyard amenity areas along Camino de la Siesta and a dog park at the corner of Camino de la Siesta and Camino del Rio North, which provide additional pedestrian area for residents and creates additional articulation along these streets to enhance the pedestrian experience.~~

Additionally, as a result of the project being located within the floodplain, proposed project development must be raised. To soften the visual appearance of the project from the street, two low terraced walls functioning as raised planters provide the necessary elevation while minimizing the visual effect to motorists and pedestrians along Camino de la Reina ~~and Camino de la Siesta~~, which results in an additional constraint upon the sidewalk and parkway development along these streets. The reduced sidewalk and parkway widths do not affect pedestrian access as adequate sidewalk and parkways would still be provided for pedestrians, albeit at slightly lesser widths. Street landscaping and the project's architectural features (i.e., low terraced walls, on-site landscaping, grand staircase) would ensure that the reduced sidewalk and parkway width would not detract from public views.

The allowable deviations for reduced sidewalk widths and reduced parkway width would not result in an increased hazard to pedestrians. Although sidewalk widths would be less than the PDO requirements (~~five feet for sidewalks along Camino del Rio North and Camino de la Siesta where eight feet is required and~~ five feet for sidewalk along Camino de la Reina where 10 feet is required), sidewalks provided by the project would still be wide enough for comfortable travel and would be buffered from travel lanes by a parkway. Although the parkway would be reduced along Camino de la Reina, which would provide a five-foot parkway where eight feet is required in the PDO), this reduction in parkway width does not diminish the pedestrian experience nor does it present a traffic hazard.

Significance of Impacts

The project would be designed in accordance with City requirements and regulations and would not result in an increase in traffic hazards. No impacts would result.

Mitigation Measures

Mitigation would not be required.

Issue 6

Would the proposal conflict with adopted policies, plans, or programs supporting alternative transportation modes (e.g., bus terminals, bicycle racks)?

Impact Threshold:

- Transportation impacts may be significant if the project would conflict with adopted policies, plans, or programs supporting alternative transportation modes (i.e., bus turnouts, bicycle racks).

Impact Analysis

There is currently a bus stop for Bus Route 6 located on the project's north boundary. This bus stop would be retained with implementation of the project. The project would not conflict with bus transportation.

The project would provide 129 residential bicycle parking spaces (where 123 are required), in addition to five retail commercial bicycle parking spaces. The project site is located approximately 410 feet from an entrance to the San Diego River Park River Pathway, which ultimately provides active transportation linkage from Ocean Beach in the west to the headwaters of the San Diego River in Santee to the east. The project would provide for bicycle access to and from the project site and would provide for bicycle parking on-site. The project would not conflict with bicycle transportation.

The CAP requires implementation of a Transportation Demand Management (TDM) program for projects that would accommodate 50 or more tenant-occupants (employees). Although the project does not reach this threshold for a required TDM program, the project would voluntarily implement TDM strategies as a condition of approval, to include the following:

- Kiosks or bulletin boards in central locations, which encourage alternative modes of transportation.
- Informational newsletters to residents, tenants and employees discussing iCommute RideLink and other tools for carpooling, bicycling, and alternative modes of transportation.
- Designated carpool coordinator for the residents.
- Bicycle parking in central locations.
- Preferred parking for fuel efficient vehicles.
- Shuttle - Nine passenger shuttle, including driver, to transport residents and employees of the project to the nearest transit stations at Fashion Valley and Mission Valley shopping centers. This shuttle would travel on a regular schedule and the service will be provided to residents and employees free of charge.

Significance of Impacts

The project would be designed to be compatible with alternative transportation modes. No impacts would result.

Mitigation Measures

Mitigation would not be required.



Figure 5.2-1. Existing Average Daily Traffic

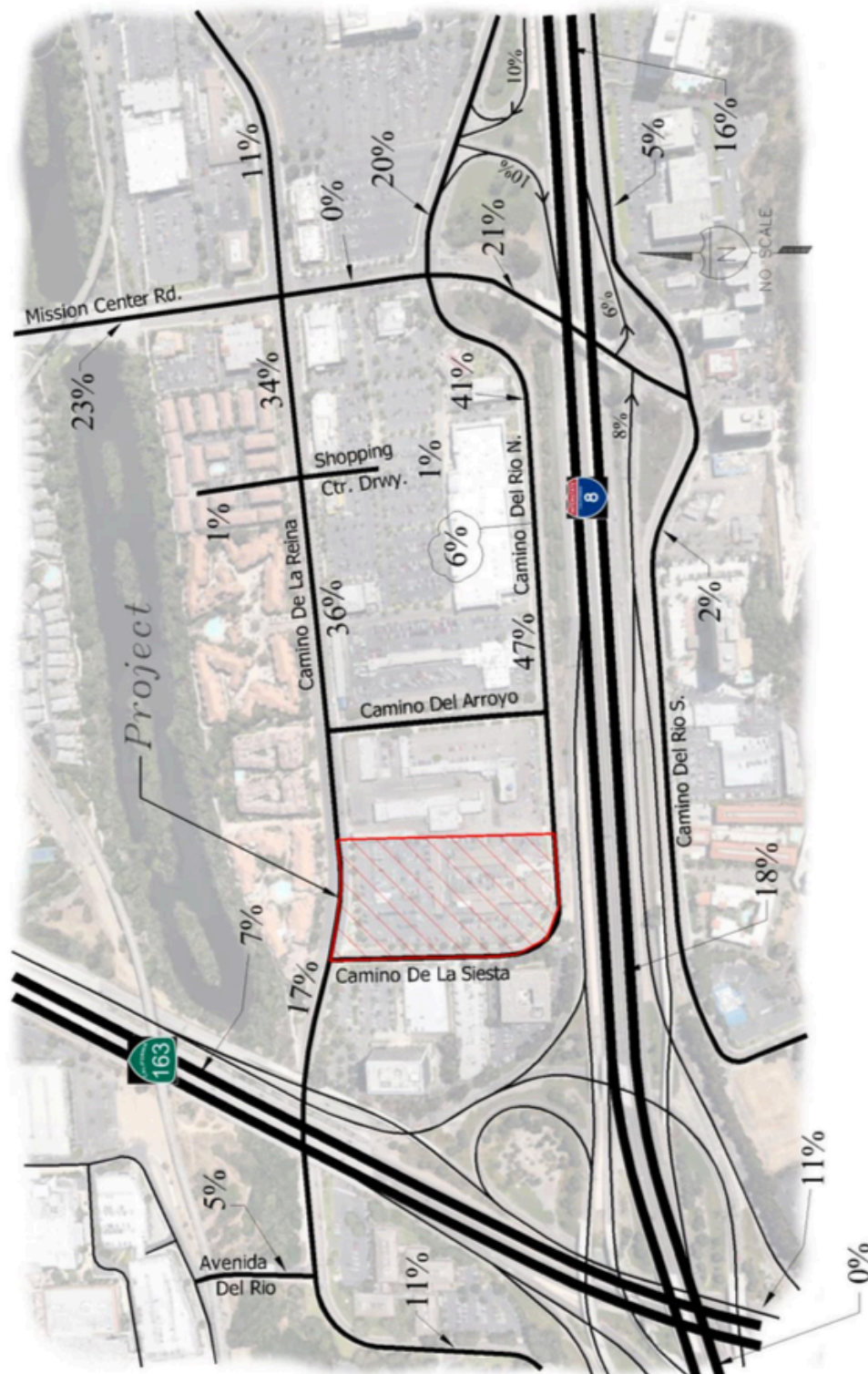


Figure 5.2-2. Project Only Trip Distribution



Figure 5.2-3. Project Only Average Daily Traffic



Figure 5.2-4. Existing with Project Average Daily Traffic



Figure 5.2-5. Other Projects Average Daily Traffic



Figure 5.2-6. Near Term Average Daily Traffic



Figure 5.2-7. Near Term with Project Average Daily Traffic



Figure 5.2-8. Horizon Year 2035 without Project Average Daily Traffic



Figure 5.2-9. Horizon Year 2035 with Project Average Daily Traffic

5.3 Visual Effects and Neighborhood Character

This section describes the existing visual setting of the project and vicinity within the context of the surrounding community. Additionally, this section identifies applicable guidelines and regulations related to visual resources and evaluates potential visual impacts related to implementation of the project.

5.3.1 Existing Conditions

VIEWS OF THE ON-SITE DEVELOPMENT

The Witt Mission Valley project site is situated in the west-central portion of the Mission Valley community (see Figure 2-3, *Project Location Map*). The 5.13-acre project site is the location of an existing 38,070-square-foot commercial auto dealership with sales offices, service bays, and exterior auto sales areas. Existing development includes surface parking, driveways, and landscaping (see Figure 2-4, *Existing Site Conditions*). Views of the project site from the south are currently of the sales office/show room, service entrance, and vehicles for sale of various sizes. Minimal landscaping exists along the contiguous sidewalk. The current main access to the auto dealership also is located off Camino del Rio North. Views of the project site from the north are predominantly screened by chain link fencing topped with barbed wire. Views through the chain link fence are of parked vehicles and vehicle maintenance buildings. Views from the west are of parked vehicles, mostly mid-size sedans. Some landscaping exists along this frontage in the form of low shrubs and mature trees. A second driveway accessing the property occurs along this frontage. Views from the east are blocked by current construction of the Millennium Mission Valley project.

VIEWS FROM THE PROJECT SITE TO OFF-SITE DEVELOPMENT

As shown in Figure 2-3, *Project Location Map*, the Witt Mission Valley project site is located south of Camino de la Reina, north of Camino del Rio North, west of Camino del Arroyo, and east of Camino de la Siesta. Multi-family residential uses are located to the north of the project site. Construction of the Millennium Mission Valley project (a mixed-use project providing multi-family residential housing, office space, and commercial use) is located to the east of the project site. Office uses are located to the west of the project site. The I-8 freeway is located south of the project site separated from the project site by Camino del Rio North and solid wall along the freeway.

Views from the project site are of the surrounding urban development. Views to the south are of I-8 freeway. Existing auto dealerships and hotel development along Camino del Rio South beyond I-8 are also visible from the project site. Views from the project site to the north are of existing multi-family development on the north side of Camino de la Reina. The landscaped median partially screens these views. Views from the project site to the east are of the construction of the Millennium Mission Valley project. Views to the west are of office developments, parking garage, and surface parking, with partial views of the I-8 and SR 163 off-ramp in the distance.

NEIGHBORHOOD CHARACTER

The project site is located in Mission Valley, an urbanized community in the City of San Diego. Situated in the west-central portion of the community, the character of the surrounding area is an evolving mix of multi-family residential; hotel development; retail commercial in the form of regional malls and several smaller commercial retail centers and strip malls; and office/light industry development, both as mid- and high-rise structures and more typical low-rise light industrial buildings. Redevelopment is actively occurring within Mission Valley, most notably on the Vulcan quarry site that is redeveloping as the Civita neighborhood located approximately two miles

to the north of the project site, and the Millennium Mission Valley mixed-use project site located immediately to the east of the project site. Two recent mixed-use projects have been approved for redevelopment located 0.5 mile to the west of the project site, the Union-Tribune project and the Alexan Fashion Valley project. In addition to redevelopment, other developments such as Westfield Mission Valley Mall and Fashion Valley Mall are periodically remodeling and modernizing.

The project site is located within a landmark/view sensitive area, as defined by the Mission Valley Community Plan (see Figure 5.1-3, *Mission Valley Community Plan Urban Design – Landmarks and Community Entrance* in Section 5.1, *Land Use*). According to the Community Plan, “[t]he gateways, or entrances into the community are another type of landmark. Being crisscrossed by regional freeways, Mission Valley has many of them. Each should provide a clear view into, as well as through the community. New development located at these entrances will also become community landmarks, and should be designed with that thought in mind.”

LIGHT/GLARE/SHADING

Outdoor lighting is regulated by Section 142.0740 of the City of San Diego Land Development Code. The purpose of the City’s outdoor lighting regulations is to minimize negative impacts from light pollution including light trespass, glare, and urban sky glow in order to preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination. Regulation of outdoor lighting is also intended to promote lighting design that provides for public safety and conserves electrical energy. New outdoor lighting fixtures must minimize light trespass in accordance with the Green Building Regulations where applicable, or otherwise shall direct, shield, and control light to keep it from falling onto surrounding properties. No direct-beam illumination is permitted to leave the premises. The City’s lighting regulations require that most outdoor lighting be turned off between 11:00 PM and 6:00 AM with some exceptions (such as lighting provided for commercial and industrial uses that continue to be fully operational after 11:00 PM, adequate lighting for public safety, etc.).

Section 142.0730 of the City’s Land Development Code regulates glare. This section permits a maximum of 50 percent of the exterior of a building to be comprised of reflective material that has a light reflectivity factor greater than 30 percent. Additionally, reflective building materials are not be permitted where the City Manager determines that their use would contribute to potential traffic hazards, diminished quality of riparian habitat, or reduced enjoyment of public open space.

The project site is located in a fully developed urban community. Lighting from commercial office, retail, and multi-family residential development, as well as street lighting on public streets and freeways, predominate the area. Because the majority of development in the project area is comprised of retail uses and multi-family residential developments, glare from an expanse of windows is minimal. The nearest office building is located to the west of the project site and is approximately 12-stories in height. The design of that building combines concrete and windows, which limits the amount of glare. Relative to shading, there are no buildings in the immediate project area that can cast substantial shadows on the project site for extended periods of time. The office building to the west of the project site is at a distance such that afternoon shadows from the building do not reach the project site.

5.3.2 Regulatory Framework

San Diego Municipal Code

Chapters 11 through 15 of the SDMC are referred to as the Land Development Code (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 and height limitations based on development standards.

Lighting Regulations

Lighting within the City is controlled by the City's Outdoor Lighting Regulations per SDMC, Section 142.0740. The City's Outdoor Lighting Regulations are intended to protect surrounding land uses as well as activities related to astronomy at the Palomar and Mount Laguna observatories from excessive light generated by new development.

Glare Regulations

Glare within the City is controlled by SDMC, Section 142.0730 (Glare Regulations). The City's Glare Regulations (City of San Diego 2012) include the following:

- A maximum of 50 percent of the exterior of a building may be comprised of reflective material that has a light-reflectivity factor greater than 30 percent (Section 142.0730 (a)).
- Reflective building materials shall not be permitted where the City Manager determines that their use would contribute to potential traffic hazards, diminished quality of riparian habitat, or reduced enjoyment of public open space (Section 142.0730 (b)).

City of San Diego General Plan

Table 5.1-2, *General Plan Consistency Analysis*, in Section 5.1, *Land Use*, describes the Urban Design Element of the General Plan and contains the goals, recommendations, and urban design objectives that relate to visual issues and community and neighborhood character pertaining to the project. Project consistency with these goals and policies is described in detail in Table 5.1-2. Relevant to the discussion of Visual Effects and Neighborhood Character are the General Urban Design goals and policies, as well as the Distinctive Neighborhoods and Residential Design goals and policies.

General Urban Design goals address the pattern and scale of development, as well as the creation of distinctive districts, communities, neighborhoods, and village centers within the City. Policies address sustainability (including conservation and passive temperature regulation) and sustainable building methods, contribution of new development to existing community contexts, architectural features and finishes, and articulated buildings elevations. Demarcation of public and private space is included within these policies, as well as placement of development elements, such as parking, pedestrian entrances, and walkways.

The Distinctive Neighborhoods and Residential Design goals and policies address the desire for in-fill housing to be sensitive to the character and quality of existing neighborhoods. This is addressed through policies aimed at integrating new construction into the existing community fabric, providing transitions in scale between higher-density development and lower-density neighborhoods, incorporating a variety of unit types in multi-family projects, and providing usable open space.

Mission Valley Community Plan

Section 5.1, *Land Use*, describes the Urban Design Element of the Mission Valley Community Plan and contains the goals, recommendations, and urban design objectives that relate to visual issues and community and neighborhood character pertaining to the project. Project consistency with these goals and policies is described in detail in Table 5.1-3, *Mission Valley Community Plan Consistency Analysis*. Design guidelines of this element of the Community Plan relevant to the project include those for landmarks, solar access, and water conservation. Additionally, the project is located along a stretch of Camino de la Reina that is within a designated gateway to the community, as shown in Figure 5.1-3. *Mission Valley Community Plan – Urban Design Landmarks and Community Entrances*.

5.3.3 Impact Analysis**Issue 1**

Would the proposal result in the creation of a negative aesthetic site or project?

Issue 2

Would the proposal's bulk, scale, materials, or style be incompatible with surrounding development?

Issue 3

Would the proposal 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 under developed area?

Impact Thresholds:

- The project would create a disorganized appearance and would substantially conflict with City codes (e.g., a sign plan which proposes extensive signage beyond the City's sign ordinance allowance).
- The project significantly conflicts with the height, bulk, or coverage regulations of the zone and does not provide architectural interest (e.g., a tilt-up concrete building with no offsets or varying window treatment).
- The project exceeds the allowable height or bulk regulations and the height and bulk of the existing patterns of development in the vicinity of the project by a substantial margin.
- The project includes crib, retaining, or noise walls greater than six feet in height and 50 feet in length with minimal landscape screening or berming where the walls would be visible to the public.
- The project would have an architectural style or use building materials in stark contrast to adjacent development where the adjacent development follows a single or common architectural theme (e.g., Gaslamp Quarter, Old Town).
- The project is located in a highly visible area (e.g., on a canyon edge, hilltop, or adjacent to an interstate highway) and would strongly contrast with the surrounding development or natural topography through excessive height, bulk, signage, or architectural projections.

Impact Analysis**Bulk and Scale**

The project site is located within an urbanized portion of Mission Valley surrounded by urban development. Multi-family residential development is located to the north of the project site. Immediately north of the project is the River Scene condominium development. This development features three stories of attached residential development over a partially-below grade parking structure. One additional residential development occurs to the north of the project site. Rio del Oro to the east of River Scene is a four-story condominium development over an at-grade parking structure. With the exception of entry areas, these developments face Camino de la Reina as a more or less solid mass and provide landscaping along the roadway. West of the project site are two multiple-story office buildings with structured and surface parking. To the east, the Millennium Mission Valley mixed-use project is currently under construction. The Millennium Mission Valley project consists of residential, commercial, and shopkeeper units ranging in height from one to five stories wrapped around a five-story parking structure.

The project proposes development that would vary in height from one to five stories. The residential building would be wrapped around a five-story above-ground parking structure. Lower massing would occur along Camino de la Reina in the form of commercial buildings, as well as partially along Camino de la Siesta and in the eastern portion of the property to allow for transition between redevelopment that is under construction and the project. Additionally, the project would include a plaza along Camino de la Reina, two resident amenity courtyards along Camino de la Siesta, and a dog park at the corner of Camino del Rio North and Camino de la Siesta. These open spaces further break up the bulk and scale of the project and allow views into the project, avoiding a solid massed appearance along the roadways or from vantage points.

~~The project proposes an allowable deviation to maximum structure (lot) coverage. As discussed in Section 5.1, the project proposes a deviation to the maximum structural development coverage to allow for maximum and efficient use of the project site. Residential, commercial retail, and commercial office buildings are proposed to front on and address surrounding streets. An internal parking garage would provide parking for residential use and would be wrapped inside the residential development. The project would not exceed allowed building height. The deviation to allow 50.9 percent structural development coverage where 50 percent is allowed in the underlying zone. This deviation of 0.9 percent would not result in an incompatible bulk or scale. The project would be consistent with all other bulk and scale requirements, including required setbacks.~~

The project also proposes retaining walls where necessary due to FEMA requirements to raise the entire site two feet above the floodway elevation. Approximately 3,900 feet of retaining and planter walls are proposed for the project; the maximum height of walls would be approximately eight feet.

Where retaining walls would be required to be higher than six feet within the public right-of-way, a break in the wall with a setback would be provided so no single wall face would be greater than the allowable regulation. In other areas of the project site, where retaining walls exceed six feet in height but are not within the public right-of-way, ample landscaping would be provided to screen the wall from public views.

Project Compatibility and Community Character

The project is located in Mission Valley, an urbanized community. The character of the surrounding area is an evolving mix of multi-family residential; hotel development; retail commercial in the form of regional malls and

several smaller commercial retail centers; and office/light industry development, both as mid- and high-rise structures and more typically low-rise light industrial building. Redevelopment is actively occurring within Mission Valley. No single architectural theme is present in Mission Valley or along Camino de la Reina. The project would be a mixed-use development consisting of residential, commercial office, and commercial retail uses. The project would range in height from one to five stories wrapped around a five-story parking structure. The project's massing, colors, and materials would be compatible with adjacent development. The project would not result in substantial alteration to the existing or planned character of the area.

The project would not create a negative aesthetic site or property, nor would it create a disorganized appearance. Building materials would be compatible with what exists currently. Adjacent residential developments have finishes of stucco and plaster with stone balustrades. The project would utilize similar finishes such as stucco, stone, and fiber cement siding, providing a contemporary complement to the existing development. As shown in Figures 3-2a through 3-2i, *Project Elevations*, as well as Figure 5.3-1, *Perspective View – Project Entry from Camino de la Siesta*, the Witt Mission Valley project would feature architectural elements such as window and balconies; varied building mass and rooflines; and varied finishes and materials including stucco siding, stacked stone fiber cement siding, aluminum storefronts, glass railings, painted metal railings, metal awnings, sun shades, metal siding, and composite wood panels. The project's architectural elements are intended to provide interesting and identifiable features, which would allow pedestrians and motorists to easily find their destinations. Architectural features such as varied building material, heights, and setbacks would provide vertical relief to the façades and would create focal points around the project for both pedestrians and passing vehicles. The project's massing, colors, and materials have been selected to complement and blend with the adjacent development.

The project offers greater architectural detail and color palette than what is existing on-site and in the nearby office development. Project design includes recessed and protruding elements, such as windows and balconies, to add visual interest and character to the project site. Building mass and rooflines would be varied, as would be proposed finishes and materials, as described above. The project would not degrade the visual character of the project site or its surrounding. The project would also not result in creating a negative aesthetic site or property.

Views

The project site is located within a designated landmark or view sensitive area, per the Mission Valley Community Plan. Per the Mission Valley Community Plan, view considerations are in relation to the River and are of two types: (1) ground level views from public areas such as roads, and (2) aerial views from the hillsides into the River area and from public areas such as parks and roads in surrounding communities. Neither of these conditions apply to the project, as the project is not sited along the River or hillside; no impacts to view corridors would occur. The project would contribute to the creation of a community landmark in the form of the emerging Main Street along Camino de la Reina. The project has been designed to be sensitive to community views. Buildings would setback from the roadways; view openings to and from the project would be provided at amenity areas.

Significance of Impacts

The project would not result in substantial alteration to the existing or planned character of the area. The project would not contrast with existing surrounding development through excessive height or bulk. ~~Although the project would require an allowable deviation from the maximum lot coverage requirements, the project would not exceed the height or bulk regulations. Overall, the project would be consistent with existing height and bulk regulations with allowable deviations.~~ Retaining walls proposed would not be in excess of height and length regulations. The

project's bulk, scale, and materials would be compatible with the surrounding development. The project would not create a disorganized appearance, nor would it result in an architectural style or building materials in contrast with surrounding development. Therefore, impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

Impact Analysis

Issue 4

Would the proposal create substantial light or glare that would adversely affect daytime or nighttime views in the area?

Impact 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 material with a light reflectivity greater than 30 percent (see 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 would emit a substantial amount of ambient light into the nighttime sky. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and industrial uses, and natural areas.

Impact Analysis

The project site is currently fully developed. Current development includes four buildings and surface parking. The project area currently contains existing lighting sources, such as streetlights along major roadways and surrounding development parking lot lighting. On-site sources of light are associated with the buildings and parking areas.

Lighting

Landscaping and architectural features of the project would be illuminated and accented with lighting. Lighting would be provided for the parking structure and surface parking areas. Additional lighting would be provided in pedestrian and circulation areas for added security. The project would not create a new source of substantial light that would adversely affect daytime or nighttime views in the area. Outdoor lighting would be regulated by compliance with Section 142.0740 of the City of San Diego Land Development Code and would not trespass onto adjacent properties or into the nighttime sky.

Glare

Glare would be avoided in accordance with Section 142.0730 of the City of San Diego Land Development Code. Less than 50 percent of building façades would incorporate glass or other reflective material that would cause glare effects on surrounding roadways and properties. Where glass is incorporated, it would be non-reflective in nature and meet the 30 percent reflectivity factor requirement.

Shading

The project would not contribute to shading of surrounding areas, as the highest portions of the project site are setback from existing development and would therefore maintain project shading primarily on-site. Such effects

would not substantially interfere with useable areas since shading would be limited. Off-site shading would be comparable to what occurs as a result of surrounding development today, with no buildings tall enough to create permanent pockets of shade throughout the day. Similar to surrounding development and typical of mid-rise urban development, shading provided by the project would move throughout the day with the movement of the sun.

Significance of Impacts

The project would not result in significant lighting, glare, or shading impacts. The project would not create a new source of substantial light that would adversely affect daytime or nighttime views in the area, as the project lighting would be in conformance with the City's outdoor lighting regulations. Glare impacts would not occur because the project would consist of less than 50 percent reflective materials in compliance with the City's glare regulations. The impact of shadows cast by the project would not be considered significant.

Mitigation Measures

Mitigation would not be required.



**Figure 5.3-1. Perspective View- Project
Entry from Camino de la Siesta**

5.4 Air Quality

This section evaluates the potential air quality-related impacts associated with the project. The following discussion is based on the *Air Quality Technical Report* prepared by Scientific Resources Associated (November 16, 2017), included as Appendix E.

5.4.1 Existing Conditions

CLIMATE AND METEOROLOGY

The project site is located in the San Diego Air Basin (SDAB). The climate of the SDAB is dominated by a semi-permanent high pressure cell located over the Pacific Ocean. This cell influences the direction of prevailing winds (westerly to northwesterly) and maintains clear skies for much of the year. The high pressure cell also creates two types of temperature inversions that may act to degrade local air quality.

Subsidence inversions occur during the warmer months as descending air associated with the Pacific high pressure cell comes into contact with cool marine air. The boundary between the two layers of air creates a temperature inversion that traps pollutants. The other type of inversion, a radiation inversion, develops on winter nights when air near the ground cools by heat radiation and air aloft remains warm. The shallow inversion layer formed between these two air masses also can trap pollutants. As the pollutants become more concentrated in the atmosphere, photochemical reactions occur that produce ozone, commonly known as smog.

Figure 5.4-1, *Wind Rose – MCAS Miramar*, provides a graphic representation of the prevailing winds in the project vicinity, as measured at Marine Corps Air Station (MCAS) Miramar, which is the closest meteorological monitoring station to the site.

BACKGROUND AIR QUALITY

The APCD operates a network of ambient air monitoring stations throughout San Diego County. The purpose of the monitoring stations is to measure ambient concentrations of the pollutants and determine whether the ambient air quality meets the California Ambient Air Quality Standards (CAAQS) and the National Ambient Air Quality Standards (NAAQS). The nearest ambient monitoring station to the project site is the Kearny Mesa monitoring station, which measures ozone (O_3), nitrogen dioxide (NO_2), respirable particulate matter (or particulate matter with an aerodynamic diameter of 10 microns or less, PM_{10}), and respirable particulate matter (or particulate matter with an aerodynamic diameter of 25 microns or less, $PM_{2.5}$). The nearest station that measures carbon monoxide (CO) and sulfur dioxide (SO_2) is the downtown San Diego monitoring station. Ambient concentrations of pollutants over the last five years available are presented in Table 5.4-1, *Ambient Background Concentrations*.

Table 5.4-1. Ambient Background Concentrations

Air Quality Indicator	2012	2013	2014	2015	2016
Ozone (O₃)					
Peak 1-hour value (ppm)	0.099	0.081	0.099	0.077	0.087
Days above State standard (0.09 ppm)	1	0	1	0	0
Peak 8-hour value (ppm)	0.076	0.070	0.081	0.070	0.075
Fourth high 8-hour value (ppm)	0.067	0.066	0.071	0.067	0.068
Days above Federal standard (0.070 ppm) ⁽¹⁾	2	0	4	0	3
Days above State standard (0.070 ppm)	2	0	4	0	3
Particulate matter less than or equal to 2.5 microns in diameter (PM_{2.5})					
Peak 24-hour value (µg/m ³)	20.1	22.0	20.2	25.7	19.4
Days above Federal standard (35 µg/m ³)	0	0	0	0	0
Annual Average value (µg/m ³)	8.7	8.3	8.3	7.2	7.5
Particulate matter less than or equal to 10 microns in diameter (PM₁₀)					
Peak 24-hour value (Federal) (µg/m ³) ⁽²⁾	35	39	39	39	36
Peak 24-hour value (State) (µg/m ³) ⁽²⁾	35	38	39	37	35
Days above Federal standard (150 µg/m ³)	0	0	0	0	0
Days above State standard (50 µg/m ³)	0	0	0	0	0
Annual Average value (Federal) (µg/m ³) ⁽²⁾	14.7	19.9	19.4	17.0	17.1
Annual Average value (State) (µg/m ³) ⁽²⁾	16.0	20.0	19.5	16.7	17.1
Carbon Monoxide (CO)					
Peak 1-hour value (ppm)	2.6	1.9	2.0	1.4	1.7
Days above Federal and State standard (9 ppm)	0	0	0	0	0
Peak 8-hour value (ppm)	1.9	1.2	1.8	1.1	1.3
Days above Federal standard (35 ppm)	0	0	0	0	0
Days above State standard (20 ppm)	0	0	0	0	0
Nitrogen Dioxide (NO₂)					
Peak 1-hour value (ppm)	0.057	0.067	0.051	0.051	0.053
Days above Federal standard (0.100 ppm)	0	0	0	0	0
Days above State standard (0.18 ppm)	0	0	0	0	0
Annual Average value (ppm)	0.011	0.011	0.010	0.009	0.009
Sulfur Dioxide (SO₂)					
Peak 1-hour value (ppm)	0.002	0.007	0.001	0.001	0.002
Days above Federal standard (0.075 ppm) ⁽³⁾	0	0	0	0	0
Peak 24-hour value (ppm)	0.000	0.000	0.000	0.000	0.0000
Days above State standard (0.04 ppm)	0	0	0	0	0
Annual Average value (ppm)	0.000	0.000	0.000	0.000	0.000

Notes:

⁽¹⁾ The Federal 8-hour O₃ standard was revised downward in 2015 to 0.070 ppm.⁽²⁾ State and Federal statistics may differ for the following reasons: (1) State statistics are based on California approved samplers, whereas national statistics are based on samplers using Federal reference or equivalence methods. State and Federal statistics may therefore be based on different samplers. (2) State criteria for ensuring that data are sufficiently complete for calculating valid annual averages are more stringent than the national criteria.ppm = parts per million; µg/m³ = Micrograms per cubic meter; N/A = data not availableSource: ARB <http://www.arb.ca.gov/adam/topfour/topfourdisplay.php>; Five-Year Summary <http://www.sdapcd.org/info/reports/5-year-summary.pdf>

The Kearny Mesa monitoring station measured five exceedances of the 8-hour NAAQS in 2008, one exceedance in 2009, and one exceedance in 2011. The station measured 12 exceedances of the 8-hour CAAQS in 2008, and three exceedances each in 2009, 2010, and 2011. The monitoring station measured three exceedances of the 24-hour NAAQS for PM_{2.5} in 2008, and three exceedances in 2009. No exceedances of the 24-hour NAAQS for PM_{2.5} were measured in 2010 or 2011. The data from the monitoring station indicates that air quality is in attainment of all other air quality standards.

5.4.2 Regulatory Framework

Federal

Air quality is defined by ambient air concentrations of specific pollutants identified by the United States Environmental Protection Agency (EPA) to be of concern with respect to health and welfare of the general public. The EPA is responsible for enforcing the Federal Clean Air Act (CAA) of 1970 and its 1977 and 1990 Amendments. The CAA required the EPA to establish the NAAQS, which identify concentrations of pollutants in the ambient air below which no adverse effects on the public health and welfare are anticipated. In response, the EPA established both primary and secondary standards for seven pollutants (called “criteria” pollutants). The seven pollutants regulated under the NAAQS are as follows: O₃, CO, NO₂, PM₁₀, PM_{2.5}, SO₂, and lead (Pb). Primary standards are designed to protect human health with an adequate margin of safety. Secondary standards are designed to protect property and the public welfare from air pollutants in the atmosphere. Areas that do not meet the NAAQS for a particular pollutant are considered to be “non-attainment areas” for that pollutant. The SDAB has been designated a marginal non-attainment area for the 8-hour NAAQS for O₃. The following specific descriptions of health effects for each of the criteria air pollutants associated with project construction and operations are based on EPA and the California Air Resources Board (ARB).

Ozone. O₃ is considered a photochemical oxidant, which is a chemical that is formed when reactive organic gases (ROG) and oxides of NO_x, both by-products of combustion, react in the presence of ultraviolet light. O₃ is considered a respiratory irritant and prolonged exposure can reduce lung function, aggravate asthma, and increase susceptibility to respiratory infections. Children and those with existing respiratory diseases are at greatest risk from exposure to O₃.

Carbon Monoxide. CO is a product of combustion, and the main source of CO in the SDAB is from motor vehicle exhaust. CO is an odorless, colorless gas. CO affects red blood cells in the body by binding to hemoglobin and reducing the amount of oxygen that can be carried to the body’s organs and tissues. CO can cause health effects to those with cardiovascular disease, and can also affect mental alertness and vision.

Nitrogen Dioxide. NO₂ is also a by-product of fuel combustion and is formed both directly as a product of combustion and indirectly in the atmosphere through the reaction of nitrogen oxide (NO) with oxygen. NO₂ is a respiratory irritant and may affect those with existing respiratory illness, including asthma. NO₂ can also increase the risk of respiratory illness.

Respirable Particulate Matter and Fine Particulate Matter. Respirable particulate matter, or PM₁₀, refers to particulate matter with an aerodynamic diameter of ten microns or less. Fine particulate matter, or PM_{2.5}, refers to particulate matter with an aerodynamic diameter of 2.5 microns or less. Particulate matter in this size range has been determined to have the potential to lodge in the lungs and contribute to respiratory problems. PM₁₀ and PM_{2.5} arise from a variety of sources, including road dust, diesel exhaust, combustion, tire and brake wear, construction operations, and windblown dust. PM₁₀ and PM_{2.5} can increase susceptibility to respiratory infections and can aggravate existing respiratory diseases such as asthma and chronic bronchitis. PM_{2.5} is considered to have the potential to lodge deeper in the lungs.

Sulfur dioxide. SO₂ is a colorless, reactive gas that is produced from the burning of sulfur-containing fuels such as coal and oil, and by other industrial processes. Generally, the highest concentrations of SO₂ are found near large industrial sources. SO₂ is a respiratory irritant that can cause narrowing of the airways leading to wheezing and

shortness of breath. Long-term exposure to SO₂ can cause respiratory illness and aggravate existing cardiovascular disease.

Lead. Pb in the atmosphere occurs as particulate matter. Pb has historically been emitted from vehicles combusting leaded gasoline, as well as from industrial sources. With the phase-out of leaded gasoline, large manufacturing facilities are the sources of the largest amounts of lead emissions. Pb has the potential to cause gastrointestinal, central nervous system, kidney, and blood diseases upon prolonged exposure. Pb is also classified as a probable human carcinogen.

State

California Clean Air Act. The California CAA was signed into law on September 30, 1988, and became effective on January 1, 1989. The California CAA requires that local air districts implement regulations to reduce emissions from mobile sources through the adoption and enforcement of transportation control measures. The California CAA required the SDAB to achieve a five percent annual reduction in ozone precursor emissions from 1987 until the standards are attained. If this reduction cannot be achieved, all feasible control measures must be implemented. Furthermore, the California CAA required local air districts to implement a Best Available Control Technology rule and to require emission offsets for nonattainment pollutants.

The ARB is the State regulatory agency with authority to enforce regulations to both achieve and maintain air quality in California. The ARB is responsible for the development, adoption, and enforcement of the State's motor vehicle emissions program, as well as the adoption of the CAAQS. The ARB also reviews operations and programs of the local air districts, and requires each air district with jurisdiction over a nonattainment area to develop its own strategy for achieving the NAAQS and CAAQS. The CAA allows states to adopt ambient air quality standards and other regulations provided they are at least as stringent as Federal standards. The ARB has established the more stringent CAAQS for the six criteria pollutants through the California CAA of 1988, and also has established CAAQS for additional pollutants, including sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. The SDAB is currently classified as a nonattainment area under the CAAQS for O₃, PM₁₀, and PM_{2.5}. It should be noted that the ARB does not differentiate between attainment of the 1-hour and 8-hour CAAQS for O₃; therefore, if an air basin records exceedances of either standard the area is considered a nonattainment area for the CAAQS for O₃. The SDAB has recorded exceedances of both the 1-hour and 8-hour CAAQS for O₃. The following specific descriptions of health effects for the additional California criteria air pollutants are based on the ARB.

Sulfates. Sulfates are the fully oxidized ionic form of sulfur. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized to SO₂ during the combustion process and subsequently converted to sulfate compounds in the atmosphere. The conversion of SO₂ to sulfates takes place comparatively rapidly and completely in urban areas of California due to regional meteorological features. The ARB's sulfates standard is designed to prevent aggravation of respiratory symptoms. Effects of sulfate exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardio-pulmonary disease. Sulfates are particularly effective in degrading visibility, and due to fact that they are usually acidic, can harm ecosystems and damage materials and property.

Hydrogen Sulfide (H₂S). H₂S is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas, and can be emitted as the result of geothermal energy exploitation. Breathing H₂S at levels above the standard

would result in exposure to a very disagreeable odor. In 1984, an ARB committee concluded that the ambient standard for H₂S is adequate to protect public health and to significantly reduce odor annoyance.

Vinyl Chloride. Vinyl chloride, a chlorinated hydrocarbon, is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products. Vinyl chloride has been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents. Short-term exposure to high levels of vinyl chloride in air causes central nervous system effects, such as dizziness, drowsiness, and headaches. Long-term exposure to vinyl chloride through inhalation and oral exposure causes liver damage. Cancer is a major concern from exposure to vinyl chloride via inhalation. Vinyl chloride exposure has been shown to increase the risk of angiosarcoma, a rare form of liver cancer, in humans.

Visibility Reducing Particles. Visibility-reducing particles consist of suspended particulate matter, which is a complex mixture of tiny particles that are comprised of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size, and chemical composition, and can be made up of many different materials such as metals, soot, soil, dust, and salt. The CAAQS is intended to limit the frequency and severity of visibility impairment due to regional haze. A separate standard for visibility-reducing particles that is applicable only in the Lake Tahoe Air Basin is based on reduction in scenic quality.

Table 5.4-2, *Ambient Air Quality Standards*, presents a summary of the ambient air quality standards adopted by the Federal and California Clean Air Acts.

Table 5.4-2. Ambient Air Quality Standards

Pollutant	Average Time	California Standards		National Standards		
		Concentration	Method	Primary	Secondary	Method
Ozone (O ₃)	1 hour	0.09 ppm (176 µg/m ³)	Ultraviolet Photometry	--	--	Ethylene Chemiluminescence
	8 hour	0.070 ppm (137 µg/m ³)		0.075 ppm (147 µg/m ³)	0.075 ppm (147 µg/m ³)	
Carbon Monoxide (CO)	8 hours	9.0 ppm (10 mg/m ³)	Non-Dispersive Infrared Spectroscopy (NDIR)	9 ppm (10 mg/m ³)	--	Non-Dispersive Infrared Spectroscopy (NDIR)
	1 hour	20 ppm (23 mg/m ³)		35 ppm (40 mg/m ³)		
Nitrogen Dioxide (NO ₂)	Annual Average	0.030 ppm (56 µg/m ³)	Gas Phase Chemiluminescence	0.053 ppm (100 µg/m ³)	--	Gas Phase Chemiluminescence
	1 hour	0.18 ppm (338 µg/m ³)		0.100 ppm (188 µg/m ³)	--	
Sulfur Dioxide (SO ₂)	24 hours	0.04 ppm (105 µg/m ³)	Ultraviolet Fluorescence	--	--	Pararosaniline
	3 hours	--		--	0.5 ppm (1300 µg/m ³)	
	1 hour	0.25 ppm (655 µg/m ³)		0.075 ppm (196 µg/m ³)	--	
Respirable Particulate Matter (PM ₁₀)	24 hours	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	150 µg/m ³	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m ³		--	--	
Fine Particulate Matter (PM _{2.5})	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	12 µg/m ³	--	Inertial Separation and Gravimetric Analysis
	24 hours	--		35 µg/m ³	--	
Sulfates	24 hours	25 µg/m ³	Ion Chromatography	--	--	--
Lead	30-day Average	1.5 µg/m ³	Atomic Absorption	--	--	Atomic Absorption
	Calendar Quarter	--		1.5 µg/m ³	1.5 µg/m ³	

	3-Month Rolling Average	--		0.15 µg/m ³	0.15 µg/m ³	
Hydrogen Sulfide	1 hour	0.03 ppm (42 µg/m ³)	Ultraviolet Fluorescence	--	--	--
Vinyl Chloride	24 hours	0.010 ppm (26 µg/m ³)	Gas Chromatography	--	--	--

m= parts per million; µg/m³ = micrograms per cubic meter; mg/m³= milligrams per cubic meter

Source: California Air Resources Board, www.arb.ca.gov, 2013, <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>

Toxic Air Contaminants. In 1983, the California Legislature enacted a program to identify the health effects of Toxic Air Contaminants (TACs) and to reduce exposure to these contaminants to protect the public health (AB 1807: Health and Safety Code sections 39650-39674). The Legislature established a two-step process to address the potential health effects from TACs. The first step is the risk assessment (or identification) phase. The second step is the risk management (or control) phase of the process.

The State of California has identified diesel particulate matter as a TAC. Diesel particulate matter is emitted from on- and off-road vehicles that utilize diesel as fuel. Following identification of diesel particulate matter as a TAC in 1998, the ARB has worked on developing strategies and regulations aimed at reducing the emissions and associated risk from diesel particulate matter. The overall strategy for achieving these reductions is found in the *Risk Reduction Plan to Reduce Particulate Matter from Diesel-Fueled Engines and Vehicles* (State of California 2000). A stated goal of the plan is to reduce the cancer risk statewide arising from exposure to diesel particulate matter by 75 percent by 2010 and by 85 percent by 2020. The *Risk Reduction Plan* contains the following three components:

- New regulatory standards for all new on-road, off-road, and stationary diesel-fueled engines and vehicles to reduce diesel particulate matter emissions by about 90 percent overall from current levels;
- New retrofit requirements for existing on-road, off-road, and stationary diesel-fueled engines and vehicles where determined to be technically feasible and cost-effective; and
- New Phase 2 diesel fuel regulations to reduce the sulfur content levels of diesel fuel to no more than 15 parts per million (ppm) to provide the quality of diesel fuel needed by the advanced diesel particulate matter emission controls.

As an ongoing process, the ARB reviews air contaminants and identifies those that are classified as TACs. The ARB also continues to establish new programs and regulations for the control of TACs, including diesel particulate matter, as appropriate.

The local APCD has the primary responsibility for the development and implementation of rules and regulations designed to attain the NAAQS and CAAQS, as well as the permitting of new or modified sources, development of air quality management plans, and adoption and enforcement of air pollution regulations. The San Diego APCD is the local agency responsible for the administration and enforcement of air quality regulations in San Diego County.

The 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 SDAB. The San Diego County RAQS was initially adopted in 1991, and is updated on a triennial basis. The RAQS was updated in 1995, 1998, 2001, 2004, and most recently in 2009. The RAQS outlines APCD's plans and control measures designed to attain the state air quality standards for O₃. The RAQS does not address the State air quality standards for PM₁₀ or PM_{2.5}.

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 includes the APCD's plans and control measures for attaining the O₃ NAAQS. The SIP is also updated on a triennial basis. The latest SIP update was submitted by the ARB to the EPA in 1998, and the APCD is in the process of updating its SIP to reflect the new 8-hour O₃ NAAQS. To that end, the APCD has developed its *Eight-Hour Ozone Attainment Plan for San Diego County* (hereinafter referred to as the Attainment Plan). The Attainment Plan forms the basis for the SIP update, as it contains documentation on emission inventories and trends, the APCD's emission control strategy, and an attainment demonstration that shows that the SDAB will meet the NAAQS for O₃. Emission inventories, projections, and trends in the Attainment Plan are based on the latest O₃ SIP planning emission projections compiled and maintained by ARB. The inventories are based on data submitted by stakeholder agencies, including SANDAG, based on growth projections in municipal General Plans.

The ARB compiles annual statewide emission inventories in its emission-related information database, the California Emission Inventory Development and Reporting System (CEIDARS). Emission projections for past and future years were generated using the California Emission Forecasting System (CEFS), developed by ARB to project emission trends and track progress towards meeting emission reduction goals and mandates. CEFS utilizes the most current growth and emissions control data available and agreed upon by the stakeholder agencies to provide comprehensive projections of anthropogenic (human activity-related) emissions for any year from 1975 through 2030. Local air districts are responsible for compiling emissions data for all point sources and many stationary area-wide sources. For mobile sources, CEFS integrates emission estimates from ARB's emissions factors (EMFAC) and OFFROAD (emissions from off-road sources) models. Southern California Association of Governments (SCAG) and SANDAG incorporate data regarding highway and transit projects into their Travel Demand Models for estimating and projecting vehicle miles traveled (VMT) and speed. The ARB's on-road emissions inventory in EMFAC relies on these VMT and speed estimates.

Because the ARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends as well as land use plans developed by the cities and by the County as part of the development of general plans, projects that propose development that is consistent with the growth anticipated by the general plans would be consistent with the RAQS and the Attainment Plan. In the event that a project would propose development which is less dense than anticipated within the general plan, the project would likewise be consistent with the RAQS and the Attainment Plan. If a project proposes development that is greater than that anticipated in the general plan and SANDAG's growth projections, the project might be in conflict with the RAQS and SIP, and might have a potentially significant impact on air quality.

Local

In San Diego County, the San Diego APCD is the regulatory agency that is responsible for maintaining air quality, including implementation and enforcement of State and Federal regulations. The project site is located in the City of San Diego. The City of San Diego has adopted a General Plan that includes a Conservation Element that adopts policies to reduce air emissions and improve air quality within the City.

5.4.3 Impact Analysis

Thresholds of Significance

According to the City of San Diego's *California Environmental Quality Act Significance Determination Thresholds* (July 2016), a project would have a significant environmental impact if the project would result in:

- A conflict with or obstruct the implementation of the applicable air quality plan;
- A violation of any air quality standard or contribute substantially to an existing or projected air quality violation;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for O₃ precursors);
- Exposing sensitive receptors to substantial pollutant concentrations;
- Creating objectionable odors affecting a substantial number of people;
- Exceeding 100 pounds per day of particulate matter (PM) (dust); or
- Substantial alteration of air movement in the area of the project.

In their *California Environmental Quality Act Significance Determination Thresholds*, the City of San Diego has adopted emission thresholds based on the thresholds for an Air Quality Impact Assessment in the San Diego Air Pollution Control District's Rule 20.2. These thresholds are shown in Table 5.4-3, *Significance Criteria for Air Quality Impacts*.

Table 5.4-3. Significance Criteria for Air Quality Impacts

Pollutant	Emission Rate		
	Lbs/Hr	Lbs/Day	Tons/Year
Carbon Monoxide (CO)	100	550	100
Oxides of Nitrogen (NOx)	25	250	40
Respirable Particulate Matter (PM ₁₀)	--	100	15
Oxides of Sulfur (SOx)	25	250	40
Lead and Lead Compounds	--	3.2	0.6
Fine Particulate Matter (PM _{2.5})	--	55	10
Volatile Organic Compounds (VOCs)	--	137	15

In addition to impacts from criteria pollutants, project impacts may include emissions of pollutants identified by the State and Federal government as 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. With regard to evaluating whether a project would have a significant impact on sensitive receptors, air quality regulators typically define sensitive receptors as schools (Preschool to 12th Grade), hospitals, resident care facilities, day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality.

With regard to odor impacts, a project that proposes a use that would produce objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of offsite receptors.

Construction and operation emissions of the project were evaluated based on the Federal and State standards as referenced in the City's Significance Determination Thresholds.

Issue 1

Would the proposal conflict with or obstruct implementation of the applicable air quality plan?

Impact Threshold:

Both the RAQS and SIP are based on SADAG population projections, as well as land use designations and population projections included in general plans for those communities located in the County of San Diego. A

project would be inconsistent with the RAQS/SIP if it results in population and/or employment growth that exceed growth estimates for the area. If a project proposes development that is less intense than anticipated within the General Plan, then the project would likewise be consistent with the RAQS. If a project proposes development that is greater than that anticipated, the project could conflict with the RAQS and SIP and may have a potentially significant impact on air quality.

Impact Analysis

The project proposes a mix of residential (including shopkeepers units), commercial office, and commercial retail uses and complies with the Mission Valley Community Plan, which allows for a Multiple Use Development Option. The project would develop under the existing zone and land use designation; therefore, a Rezone and Community Plan Amendment would not be required. Accordingly, the project is consistent with the City's General Plan and would, therefore, be consistent with the RAQS and SIP.

Significance of Impacts

The project would not conflict with regional air quality plans and impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

Issue 2

Would the proposal result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?

Issue 3

Would the proposal exceed 100 pounds per day of Particulate Matter (dust)?

Impact Threshold:

To determine whether a project would result in emissions that would violate an air quality standard or contribute substantially to an existing or projected air quality violation, a project's emissions are evaluated based on the quantitative emission threshold established by the SDAPCD, as outlined in Table 5.4-3, *Significance Criteria for Air Quality Impacts*, consistent with the City's Significance Determination Thresholds.

Impact Analysis***Construction***

Emissions of pollutants such as fugitive dust and heavy equipment exhaust that are generated during construction are generally highest near the construction site. Emissions from the construction of the project were estimated using the CalEEMod Model, Version 2016.3.1. The CalEEMod Model provides default assumptions regarding horsepower rating, load factors for heavy equipment, and hours of operation per day. Default assumptions within the CalEEMod Model and assumptions for similar projects were used to represent operation of heavy construction equipment. Construction calculations within the CalEEMod Model utilize the number and type of construction equipment to calculate emissions from heavy construction equipment. Fugitive PM₁₀ and PM_{2.5} emissions estimates take into account compliance with Rule 55 requirements for fugitive dust suppression, which require that no visible dust be present beyond the site boundaries.

In addition to calculating emissions from heavy construction equipment, the CalEEMod Model contains calculation modules to estimate emissions of fugitive dust, based on the amount of earthmoving or surface disturbance required; emissions from heavy-duty truck trips or vendor trips during construction activities; emissions from construction worker vehicles during daily commutes; and emissions of ROG during application of architectural coatings. As part of the project design features, it was assumed that standard dust control measures (watering three times daily, reducing speeds to 15 mph on unpaved surfaces) and architectural coatings that comply with SDAPCD Rule 67.0.1 [assumed to meet a VOC content of 50 grams per liter (g/l) for interior (flat) painting and 100 g/l for exterior (non-flat) painting] would be used during construction.

Construction would be conducted in a single phase and would require approximately 25 months to complete. The grading phase of construction would include 100 cubic yards of cut and 29,000 cubic yards of fill, for a net import of 28,900 cubic yards of material. Emissions from truck trips associated with import of material are calculated by the CalEEMod model based on the amount of fill imported. Table 5.4-4, *Estimated Maximum Daily Construction Emissions*, provides the detailed construction emission estimates as calculated with the CalEEMod Model.

Table 5.4-4. Estimated Maximum Daily Construction Emissions

Emission Source	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
Demolition						
Fugitive Dust	--	--	--	--	0.67	0.10
Off-Road Equipment	3.51	35.78	22.06	0.04	1.79	1.67
On-Road Emissions	0.07	2.36	0.51	0.01	0.14	0.05
Worker Trips	0.06	0.04	0.46	0.001	0.12	0.03
Subtotal	3.64	38.18	23.03	0.05	2.72	1.75
Significance Criteria	137	250	550	250	100	55
Significant?	No	No	No	No	No	No
Grading						
Fugitive Dust	--	--	--	--	2.38	1.25
Off-Road Equipment	2.58	28.35	16.29	0.03	1.40	1.29
On-Road Emissions	0.29	9.87	2.13	0.03	0.63	0.20
Worker Trips	0.06	0.04	0.46	0.001	0.12	0.03
Subtotal	2.93	38.26	18.48	0.06	4.53	2.77
Significance Criteria	137	250	550	250	100	55
Significant?	No	No	No	No	No	No
Paving/Foundations						
Asphalt Offgasing	0.09	--	--	--	--	--
Off-Road Equipment	1.27	12.76	12.31	0.02	0.72	0.66
Worker Trips	0.08	0.05	0.62	0.002	0.17	0.04
Subtotal	1.44	12.81	12.93	0.02	0.89	0.70
Significance Criteria	137	250	550	250	100	55
Significant?	No	No	No	No	No	No
Building Construction						
Off-Road Equipment	2.36	21.08	17.16	0.03	1.29	1.21
Vendor Trips	0.29	7.94	2.05	0.02	0.49	0.18
Worker Trips	1.13	0.79	8.88	0.03	2.37	0.64
Subtotal	3.78	29.81	28.09	0.08	4.15	2.03
Significance Criteria	137	250	550	250	100	55
Significant?	No	No	No	No	No	No
Architectural Coatings Application						
Architectural Coatings	17.72	--	--	--	--	--
Off-Road Equipment	0.24	1.68	1.83	0.003	0.11	0.11
Worker Trips	0.21	0.14	1.62	0.005	0.47	0.13
Subtotal	18.17	1.82	3.45	0.01	0.58	0.24
Significance Criteria	137	250	550	250	100	55
Significant?	No	No	No	No	No	No
MAXIMUM DAILY EMISSIONS*	22.85	42.62	43.12	0.10	5.36	2.81
Significance Criteria	137	250	550	250	100	55
Significant?	No	No	No	No	No	No

*Maximum emissions of criteria pollutants during simultaneous building construction, paving, and architectural coatings application.

Operational

Operational impacts associated with the Witt Mission Valley project would include impacts associated with vehicular traffic, as well as area sources such as energy use, landscaping, consumer products use, and architectural coatings use for maintenance purposes.

A Focused Transportation Study (Urban Systems Associates, Inc. 2017) was prepared to evaluate trip generation rates and indicate the approach to address traffic impacts from the project. The Focused Transportation Study provides estimated trip generation rates and the air quality analysis is based on the project-specific ADTs as presented in the study. According to the Focused Transportation Study, based on the mix of uses for the project, the trips would be reduced by 17 percent.

Operational impacts were estimated using the CalEEMod Model, Version 2016.3.1. The CalEEMod Model calculated vehicle emissions based on emission factors from the EMFAC2014 model. It was assumed that the first year of full occupancy would be 2020. Based on the results of the EMFAC2014 model for subsequent years, emissions would decrease on an annual basis from 2020 onward due to phase-out of higher polluting vehicles and implementation of more stringent emissions standards that are taken into account in the EMFAC2014 model.

Table 5.4-5, *Operational Emissions*, presents the results of the emission calculations, in pounds (lbs)/day, for the project.

Table 5.4-5. Operational Emissions

	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Maximum Daily Emissions						
Summer Day, lbs/day						
Area Sources	13.35	0.26	22.95	0.001	0.13	0.13
Energy Use	0.08	0.71	0.38	0.004	0.07	0.07
Vehicular Emissions	3.62	14.19	38.72	0.13	10.74	2.94
TOTAL	17.05	15.17	62.05	0.13	10.94	3.13
Significance Criteria	137	250	550	250	100	55
Significant?	No	No	No	No	No	No
Winter Day, lbs/day						
Area Sources	13.35	0.26	22.95	0.001	0.13	0.13
Energy Use	0.08	0.71	0.38	0.004	0.07	0.07
Vehicular Emissions	3.51	14.54	38.57	0.12	10.74	2.94
TOTAL	16.95	15.52	61.90	0.13	10.94	3.13
Significance Criteria	137	250	550	250	100	55
Significant?	No	No	No	No	No	No

As shown in Table 5.4-5, project emissions of all criteria pollutants during operation would be below the daily thresholds and would not cause a violation of any air quality standard, contribute substantially to an existing or projected air quality violation, or exceed 1000 pounds per day particulate matter thresholds.

The project proposes a mix of uses and provides local-serving retail and office uses for residential and business land uses currently located in the project area. Furthermore, the project is an infill development that meets the City's goals for providing mixed uses within existing developed area.

Significance of Impacts

The project's construction or operational emissions would not result in a violation of any air quality standard, nor substantially contribute to an existing or projected air quality violation. In addition, the project would not exceed 100 pounds per day of particulate matter. Therefore, impacts associated with construction and operational emissions would be less than significant.

Mitigation Measures

Mitigation would not be required.

Issue 4

Would the proposal result in creating objectionable odors affecting substantial number of people?

Impact Threshold:

A project would have a potentially significant environmental impact if it would generate objectionable odors or place sensitive receptors next to objectionable odors that would affect nearby sensitive receptors.

Impact Analysis**Construction**

Project construction could result in minor amounts of odor compounds associated with diesel heavy equipment exhaust. These compounds would be emitted in various amounts and at various locations during construction. Sensitive receptors located in the vicinity of the construction site included the residences to the north of the site. Odors are highest near the source and would quickly dissipate off-site; any odors associated with construction would be short-term and intermittent in nature, and would cease upon completion of construction.

Operation

The project would not be considered a source of objectionable odors during operations. The project proposes a mix of residential and commercial uses. None of the proposed uses would result in the release of objectionable odors.

Significance of Impacts

Any odors present during construction would be temporary and would not affect sensitive receptors (residences). The project does not include land uses that would be sources of nuisance odors. Project impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

Issue 5

Would the proposal expose sensitive receptors to substantial pollutant concentrations?

Impact Threshold:

- The project would expose sensitive receptors to substantial pollutant concentrations, including air toxics such as diesel particulates. In addition, a significant impact would occur if the project would result in a CO hotspot.

Impact Analysis**CO Hot Spots**

Projects involving traffic impacts may result in the formation of locally high concentrations of CO, known as CO “hot spots.” To verify that the project would not cause or contribute to a violation of the CO standard, a screening

evaluation of the potential for CO “hot spots” was conducted. Project-related traffic would have the potential to result in CO “hot spots” if project-related traffic resulted in a degradation in the level of service at any intersection to LOS E or F. The Focused Transportation Study evaluated whether or not there would be a decrease in the level of service at the intersections affected by the project.

Based on the Focused Transportation Study, all intersections within the study area would operate at LOS D or better with the project and cumulative traffic for Existing plus Project, Near Term with Project, and Horizon Year with Project scenarios. Emissions from project-related traffic would therefore not result in CO “hot spots”.

Toxic Air Contaminants

The threshold concerns whether the project could expose sensitive receptors to substantial pollutant concentrations of TACs. If a project has the potential to result in emissions of any TAC which result in a cancer risk of greater than 10 in one million or substantial non-cancer risk, the project would be deemed to have a potentially significant impact.

Air quality regulators typically define sensitive receptors as schools (Preschool-12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. Residential land uses may also be considered sensitive receptors. The nearest sensitive receptors to the site include the multi-family housing developments located across Camino de la Reina to the north of the site.

Emissions of TACs are attributable to temporary emissions from construction emissions, and minor emissions associated with diesel truck traffic used for deliveries at the site. Truck traffic may result in emissions of diesel particulate matter, which is characterized by the State of California as a toxic air contaminant (TAC). Certain types of projects are recommended to be evaluated for impacts associated with TACs. In accordance with the SCAQMD’s “Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis” (SCAQMD 2003), projects that should be evaluated for diesel particulate emissions include truck stops, distribution centers, warehouses, and transit centers which diesel vehicles would utilize and which would be sources of diesel particulate matter from heavy-duty diesel trucks. The project would not attract a disproportionate amount of diesel trucks and would not be considered a source of TAC emissions. Based on the CalEEMod Model, heavy-duty diesel trucks would account for only 0.9 percent of the total trips associated with the project. Impacts to sensitive receptors from TAC emissions would therefore be less than significant.

The project is located in the vicinity of the Interstate 8 freeway. Camino del Rio North lies between the freeway and the project site. Project design features for the portion of the project that is nearest the freeway include a setback from Camino del Rio North and the sidewalk, as well as plantings of trees that screen the project from noise and air emissions. These features would reduce the potential for exposure from TACs from the freeway.

Other Criteria Pollutants

Because emissions of all criteria pollutants are below the thresholds set forth in the City’s Significance Determination Thresholds, the project would not expose sensitive receptors to substantial pollutant concentrations and impacts from other criteria pollutants would be less than significant.

Significance of Impacts

The project would not expose sensitive receptors to substantial pollutant concentrations in the form of CO hot spots, TACs, or other criteria pollutants. Project impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

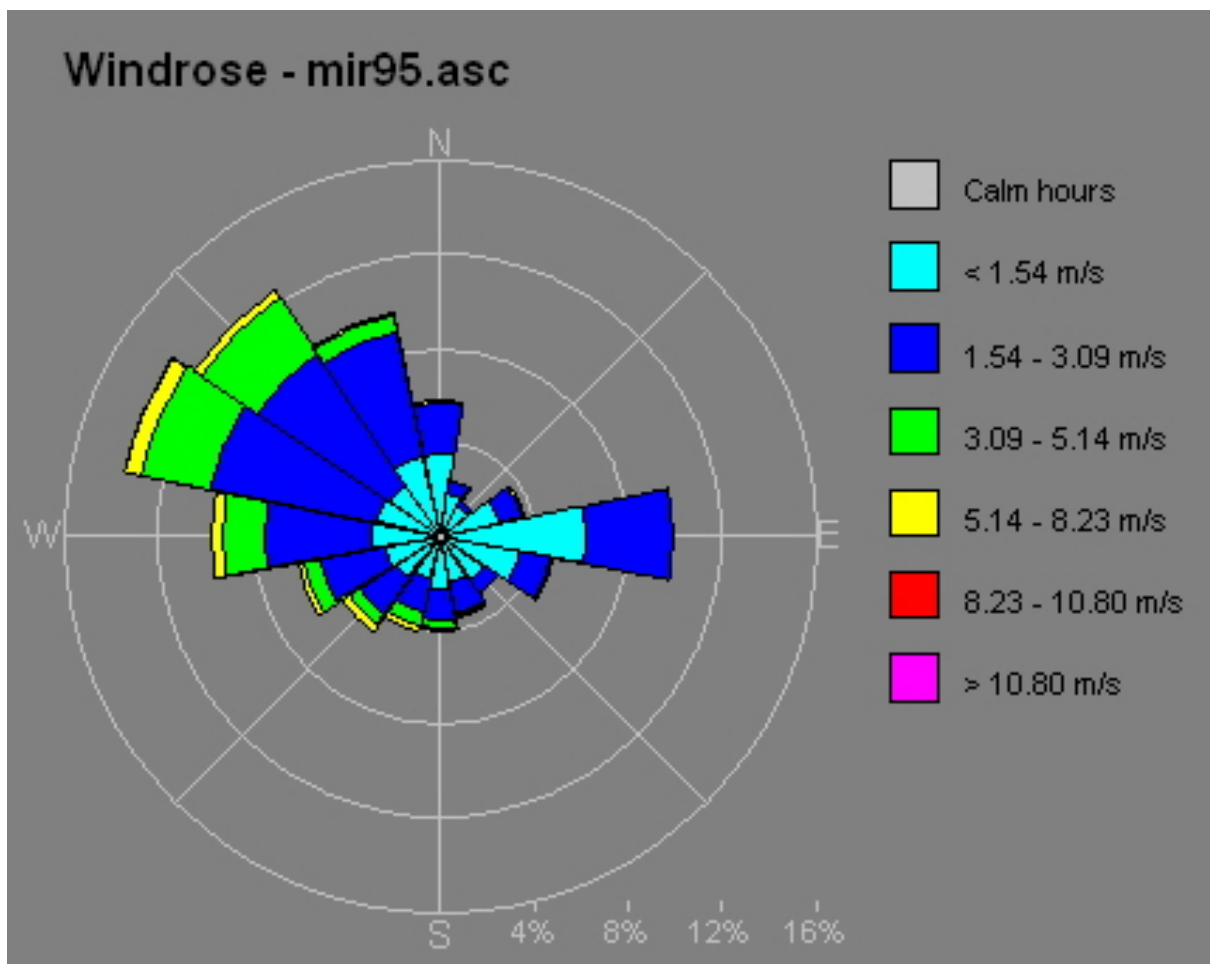


Figure 5.4-1. Wind Rose – MCAS Miramar

5.5 Greenhouse Gas Emissions

This section evaluates potential greenhouse gas-related impacts associated with the project. The following discussion is based on the *CAP Consistency Checklist* prepared by KLR Planning (March 9, 2018). A copy of the *CAP Consistency Checklist* is included as Appendix C.

5.5.1 Existing Conditions

BACKGROUND

Global Climate Change (GCC) refers to changes in average climatic conditions on Earth as a whole, including temperature, wind patterns, precipitation and storms. GCC may result from natural factors, natural processes, and/or human activities that change the composition of the atmosphere and alter the surface and features of land. Historical records indicate that global climate changes have occurred in the past due to natural phenomena (such as during previous ice ages). Some data indicate that the current global conditions differ from past climate changes in rate and magnitude.

Global temperatures are moderated by naturally occurring atmospheric gases, including water vapor, carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), which are known as GHGs. These gases allow solar radiation (sunlight) into the Earth's atmosphere, but prevent radiative heat from escaping, thus warming the Earth's atmosphere, much like a greenhouse. GHGs are emitted by both natural processes and human activities. Without these natural GHGs, the Earth's temperature would be about 61 degrees Fahrenheit (°F) cooler (California Environmental Protection Agency 2006). Emissions from human activities, such as electricity production and vehicle use, have elevated the concentration of these gases in the atmosphere. For example, data from ice cores indicate that CO₂ concentrations remained steady prior to the current period for approximately 10,000 years; however, concentrations of CO₂ have increased in the atmosphere since the industrial revolution.

GCC and GHGs have been at the center of a widely contested political, economic, and scientific debate. Although the conceptual existence of GCC is generally accepted, the extent to which GHGs generally and anthropogenic-induced GHGs (mainly CO₂, CH₄, and N₂O) contribute to it remains a source of debate. The State of California has been at the forefront of developing solutions to address GCC.

The United Nations Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. The IPCC concluded that a stabilization of GHGs at 400 to 450 ppm CO₂ equivalent concentration is required to keep global mean warming below 3.6°F (2° Celsius), which is assumed to be necessary to avoid dangerous climate change.

State law defines greenhouse gases as any of the following compounds: CO₂, CH₄, nitrous oxide N₂O, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆) [California Health and Safety Code Section 38505(g)]. CO₂, followed by CH₄ and N₂O, are the most common GHGs that result from human activity.

SOURCES AND GLOBAL WARMING POTENTIALS OF GHG

Anthropogenic sources of CO₂ include combustion of fossil fuels (coal, oil, natural gas, gasoline and wood). CH₄ is the main component of natural gas and also arises naturally from anaerobic decay of organic matter. Accordingly, anthropogenic sources of CH₄ include landfills, fermentation of manure and cattle farming. Anthropogenic sources of N₂O include combustion of fossil fuels and industrial processes such as nylon production and production of nitric

acid. Other GHGs are present in trace amounts in the atmosphere and are generated from various industrial or other uses.

GHGs have varying global warming potential (GWP). The GWP is the potential of a gas or aerosol to trap heat in the atmosphere; it is the “cumulative radiative forcing effect of a gas over a specified time horizon resulting from the emission of a unit mass of gas relative to a reference gas” (USEPA 2006). The reference gas for GWP is CO₂; therefore, CO₂ has a GWP of one. The other main greenhouse gases that have been attributed to human activity include CH₄, which has a GWP of 28, and N₂O, which has a GWP of 265. Table 5.5-1, *Global Warming Potentials and Atmospheric Lifetimes of GHGs*, presents the GWP and atmospheric lifetimes of common GHGs. In order to account for each GHG's respective GWP, all types of GHG emissions are expressed in terms of CO₂ equivalents (CO₂e) and are typically quantified in metric tons (MT) or millions of metric tons (MMT).

Table 5.5-1. Global Warming Potentials and Atmospheric Lifetimes of GHGs

GHG	Formula	100-Year Global Warming Potential	Atmospheric Lifetime (Years)
Carbon Dioxide	CO ₂	1	Variable
Methane	CH ₄	28	12
Nitrous Oxide	N ₂ O	265	121
Sulfur Hexafluoride	SF ₆	23,500	3,200
Hydrofluorocarbons	HFCs	100 to 12,000	1 to 100
Perfluorocarbons	PFCs	7,000 to 11,000	3,000 to 50,000
Nitrogen Trifluoride	NF ₃	16,100	500

Source: First Update to the Climate Change Scoping Plan, ARB 2014

The California ARB compiled a statewide inventory of anthropogenic GHG emissions and sinks that includes estimates for CO₂, CH₄, N₂O, SF₆, HFCs, and PFCs. The current inventory covers the years 1990 to 2012, and is summarized in Table 5.5-2, *State of California GHG Emissions by Sector*. Data sources used to calculate this GHG inventory include California and federal agencies, international organizations, and industry associations. The calculation methodologies are consistent with guidance from the IPCC. The 1990 emissions level is the sum total of sources and sinks from all sectors and categories in the inventory. The inventory is divided into seven broad sectors and categories in the inventory. These sectors include: Agriculture, Commercial, Electricity Generation, Forestry, Industrial, Residential, and Transportation.

Table 5.5-2. State of California GHG Emissions by Sector

Sector	Total 1990 Emissions (MMTCO ₂ e)	Percent of Total 1990 Emissions	Total 2012 Emissions (MMTCO ₂ e)	Percent of Total 2012 Emissions
Agriculture	23.4	5%	37.86	8%
Commercial	14.4	3%	14.20	3%
Electricity Generation	110.6	26%	95.05	21%
Forestry (excluding sinks)	0.2	<1%	Not reported	--
Industrial	103.0	24%	89.16	19%
Residential	29.7	7%	28.09	6%
Transportation	150.7	35%	167.38	36%
Recycling and Waste	Not reported	--	8.49	2%
High GWP Gases	Not reported	--	18.41	4%
Forestry Sinks	(6.7)	--	Not reported	--

In addition to the statewide GHG inventory prepared by the ARB, a GHG inventory was prepared by the University of San Diego School of Law Energy Policy Initiative Center (EPIC) for the San Diego region (University of San Diego 2008). The San Diego County Greenhouse Gas Inventory (SDCGHGI) takes into account the unique characteristics of the region when estimating emissions, and estimated emissions for years 1990, 2006, and 2020. Based on this inventory and the emission projections for the region, EPIC found that GHG emissions must be reduced by 33 percent below business as usual conditions for Year 2020 in order for San Diego County to return to 1990 emission levels. "Business as usual" is defined as the emissions that would occur without any greenhouse gas reduction measures. For example, construction of buildings using 2005 Title 24 building standards, and not subsequently enacted more rigorous standards, would create "business as usual" emissions.

Areas where feasible reductions could occur and the strategies for achieving those reductions are outlined in the SDCGHGI. A summary of the various sectors that contribute GHG emissions in San Diego County for year 2006 is provided in Table 5.5-3, *San Diego County 2006 GHG Emissions by Category*. Total GHGs in San Diego County are estimated at 34 MMTCO₂e.

Table 5.5-3. San Diego County 2006 GHG Emissions by Category

Sector	Total Emissions (MMTCO ₂ e)	Percent of Total Emissions
On-Road Transportation	16	46%
Electricity	9	25%
Natural Gas Consumption	3	9%
Civil Aviation	1.7	5%
Industrial Processes & Products	1.6	5%
Other Fuels/Other	1.1	4%
Off-Road Equipment & Vehicles	1.3	4%
Waste	0.7	2%
Agriculture/Forestry/Land Use	0.7	2%
Rail	0.3	1%
Water-Born Navigation	0.13	0.4%

Source: EPIC's SDCGHGI, 2008

According to the SDCGHGI, a majority of the region's emissions are attributable to on-road transportation, with the next largest source of GHG emissions attributable to electricity generation. The SDCGHGI states that emission reductions from on-road transportation will be achieved in a variety of ways, including through regulations aimed at increasing fuel efficiency standards and decreasing vehicle emissions. These regulations are outside the control of project applicants for land use development. The SDCGHGI also indicates that emission reductions from electricity generation will be achieved in a variety of ways, including through a 10 percent reduction in electricity consumption, implementation of the renewable portfolio standard (RPS), cleaner electricity purchases by San Diego Gas & Electric, replacement of the Boardman Contract (which allows the purchase of electricity from coal-fired power plants), and implementation of 400 megawatt (MW) of photovoltaics. Many of these measures are also outside the control of project applicants.

In its Climate Action Plan (City of San Diego 2015), the City identified the 2010 baseline for GHG emissions of 13,091,591 MMT CO₂e. Based on the community-wide emissions inventory, 55 percent of the baseline emissions are attributable to transportation, 23 percent are attributable to electricity use, 17 percent are attributable to natural gas use, and five percent are attributable to solid waste and wastewater handling and treatment.

TYPICAL ADVERSE EFFECTS

The Climate Scenarios Report (2006) uses a range of emissions scenarios developed by the IPCC to project a series of potential warming ranges (i.e., temperature increases) that may occur in California during the 21st century. Three warming ranges were identified: lower warming range (3.0 °F to 5.5 °F); medium warming range (5.5 to 8.0 °F); and higher warming range (8.0 °F to 10.5 °F). The Climate Scenarios Report then presents an analysis of the future projected climate changes in California under each warming range scenario.

According to the report, substantial temperature increases would result in a variety of impacts to the people, economy, and environment of California. These impacts would result from a projected increase in extreme conditions, with the severity of the impacts depending upon actual future emissions of GHGs and associated warming. These impacts are described below.

Public Health. Higher temperatures are expected to increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to O₃ formation are projected to increase by 25 to 35 percent under the lower warming range and 75 to 85 percent under the medium warming range. In addition, if global background O₃ levels increase as is predicted in some scenarios, it may become impossible to meet local air quality standards. An increase in wildfires could also occur, and the corresponding increase in the release of pollutants including PM_{2.5} could further compromise air quality. The Climate Scenarios Report indicates that large wildfires could become up to 55 percent more frequent if GHG emissions are not significantly reduced.

Potential health effects from GCC may arise from temperature increases, climate-sensitive diseases, extreme events, and air quality. There may be direct temperature effects through increases in average temperature leading to more extreme heat waves and less extreme cold spells. Those living in warmer climates are likely to experience more stress and heat-related problems (e.g., heat rash and heat stroke). In addition, climate sensitive diseases (such as malaria, dengue fever, yellow fever, and encephalitis) may increase, such as those spread by mosquitoes and other disease-carrying insects.

Water Resources. A vast network of reservoirs and aqueducts capture and transport water throughout the State from northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada mountain snowpack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snowpack, increasing the risk of summer water shortages. In addition, if temperatures continue to rise more precipitation would fall as rain instead of snow, further reducing the Sierra Nevada spring snowpack by as much as 70 to 90 percent. The State's water resources are also at risk from rising sea levels. An influx of seawater would degrade California's estuaries, wetlands, and groundwater aquifers.

Agriculture. Increased GHG and associated increases in temperature are expected to cause widespread changes to the agricultural industry, reducing the quantity and quality of agricultural products statewide. Significant reductions in available water supply to support agriculture would also impact production. Crop growth and development will change as will the intensity and frequency of pests and diseases.

Ecosystems/Habitats. Continued global warming will likely shift the ranges of existing invasive plants and weeds, thus altering competition patterns with native plants. Range expansion is expected in many species while range contractions are less likely in rapidly evolving species with significant populations already established. Continued

global warming is also likely to increase the populations of and types of pests. Continued global warming would also affect natural ecosystems and biological habitats throughout the State.

Wildland Fires. Global warming is expected to increase the risk of wildfire and alter the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55 percent, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors including precipitation, winds, temperature, and landscape and vegetation conditions, future risks will not be uniform throughout the State.

Rising Sea Levels. Rising sea levels, more intense coastal storms, and warmer water temperatures will increasingly threaten the State's coastal regions. Under the high warming scenario, sea level is anticipated to rise 22 to 35 inches by 2100. A sea level risk of this magnitude would inundate coastal areas with salt water, accelerate coastal erosion, threaten levees and inland water systems, and disrupt wetlands and natural habitats.

Sea levels rose approximately seven inches during the last century and the State of California predicts an additional rise of ten to 17 inches by 2050 and a rise of 31 to 69 inches by 2100, depending on the future levels of GHG emissions. If this occurs, resultant effects could include increased coastal flooding. Sea level rise adaptation strategies include strategies that involve construction of hard structures as barriers, such as seawalls and levees; soft structure strategies such as wetland enhancement, detention basins, and other natural strategies; accommodation strategies that include grade elevations, elevated structures, and other building design options; and withdrawal strategies that limit development to areas unaffected by sea level rise.

Compliance with IBMC Section 15.50.160, Flood Hazard Reduction Standards, would require development within coastal high hazard areas to be elevated above the base flood level and be adequately anchored to resist flotation, collapse, and lateral movement as detailed in the regulatory framework section. The project is not within the coastal high hazard area, and is therefore not subject to the standards.

5.5.2 Regulatory Framework

All levels of government have some responsibility for the protection of air quality, and each level (Federal, State, and regional/local) has specific responsibilities relating to air quality regulation. GHG emissions and the regulation of GHGs is a relatively new component of this air quality regulatory framework.

National and International Efforts

In 1988, the United Nations and the World Meteorological Organization established the IPCC to assess the scientific, technical, and socioeconomic information relevant to understanding the scientific basis for human-induced climate change, its potential impacts, and options for adaptation and mitigation. The most recent reports of the IPCC have emphasized the scientific consensus that real and measurable changes to the climate are occurring, that they are caused by human activity, and that significant adverse impacts on the environment, the economy, and human health and welfare are unavoidable.

On March 21, 1994, the United States joined a number of countries around the world in signing the United Nations Framework Convention on Climate Change. Under the Convention, governments agreed to gather and share information on GHG emissions, national policies, and best practices; launch national strategies for addressing GHG emissions and adapting to expected impacts, including the provision of financial and technological support to

developing countries; and cooperate in preparing for adaptation to the impacts of global climate change. The U.S. Supreme Court rules in *Massachusetts v. Environmental Protection Agency*, 549 U.S. 497 (2007), that USEPA has the ability to regulate GHG emissions. In addition to the national and international efforts described above, many local jurisdictions have adopted climate change policies and programs.

On December 7, 2009, the USEPA Administrator signed two distinct findings regarding GHGs under Section 202(a) of the Federal CAA:

Endangerment Finding: USEPA found that the current and projected concentrations of the six key well-mixed GHGs (CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆) in the atmosphere threaten the public health and welfare of current and future generations.

Cause or Contribute Finding: USEPA found that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution which threatens public health and welfare.

These findings do not themselves impose any requirements on industry or other entities. However, this action was a prerequisite to finalizing the EPA's proposed greenhouse gas emission standards for light-duty vehicles, which were jointly proposed by EPA and the Department of Transportation's National Highway Safety Administration (NHTSA) in two phases: Phase 1 – Model years 2012-2016 and Phase 2 – Model years 2017 – 2025. The proposed standards for Model years 2017-2025 are projected to achieve 163 grams/mile of CO₂ in Model Year 2025 on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for Model Years 2017–2021, and NHTSA intends to set standards for Model Years 2022–2025 in a future rulemaking. In addition to these regulations applicable to cars and light-duty trucks, in 2011, EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for Model Years 2014–2018. The standards for CO₂ emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by six percent –23 percent over the 2010 baselines.

In August 2016, EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to Model Year 2018–2027 vehicles for certain trailers, and Model Years 2021–2027 for semitrucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO₂ emissions by approximately 1.1 billion MT and reduce oil consumption by up to two billion barrels over the lifetime of the vehicles sold under the program.

Mandatory GHG Reporting Rule. On March 10, 2009, in response to the fiscal year (FY) 2008 Consolidated Appropriations Act (House Resolution (H.R.) 2764; Public Law 110–161), the EPA proposed a rule that requires mandatory reporting of GHG emissions from large sources in the United States. On September 22, 2009, the Final Mandatory Reporting of Greenhouse Gases Rule was signed, and was published in the Federal Register on October 30, 2009. The rule became effective on December 29, 2009. The rule will collect accurate and comprehensive emissions data to inform future policy decisions.

The EPA is requiring suppliers of fossil fuels or industrial greenhouse gases, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year of GHG emissions to submit annual reports to EPA. The

gases covered by the proposed rule are CO₂, CH₄, N₂O, HFC, PFC, SF₆, and other fluorinated gases, including nitrogen trifluoride (NF₃) and hydrofluorinated ethers (HFE).

State

The following subsections describe regulations and standards that have been adopted by the State of California to address GCC issues.

Assembly Bill 32, the California Global Warming Solutions Act of 2006. In September 2006, Governor Schwarzenegger signed California AB 32, the global warming bill, into law. AB 32 directs the ARB to do the following:

- Make publicly available a list of discrete early action GHG emission reduction measures that can be implemented prior to the adoption of the statewide GHG limit and the measures required to achieve compliance with the statewide limit.
- Make publicly available a GHG inventory for the year 1990 and determine target levels for 2020.
- On or before January 1, 2010, adopt regulations to implement the early action GHG emission reduction measures.
- On or before January 1, 2011, adopt quantifiable, verifiable, and enforceable emission reduction measures by regulation that will achieve the statewide GHG emissions limit by 2020, to become operative on January 1, 2012, at the latest. The emission reduction measures may include direct emission reduction measures, alternative compliance mechanisms, and potential monetary and non-monetary incentives that reduce GHG emissions from any sources or categories of sources that ARB finds necessary to achieve the statewide GHG emissions limit.
- Monitor compliance with and enforce any emission reduction measure adopted pursuant to AB 32.

AB 32 required that, by January 1, 2008, the ARB determine what the statewide GHG emissions level was in 1990, and approve a statewide GHG emissions limit that is equivalent to that level, to be achieved by 2020. The ARB adopted its Scoping Plan in December 2008, which provided estimates of the 1990 GHG emissions level and identified sectors for the reduction of GHG emissions. The ARB estimated that the 1990 GHG emissions level was 427 MMT net CO₂e, and the projection for “business as usual” emissions for 2020 was 596 MMT net CO₂e. The ARB therefore estimated that a reduction of 169 MMT net CO₂e emissions below “business as usual” levels would be required by 2020 to meet the 1990 level. This amounted to roughly a 28.35 percent reduction from projected business-as-usual levels in 2020. In 2011, the ARB developed a supplement to the AB 32 Scoping Plan. The Supplement updated the emissions inventory based on current projections for “business as usual” emissions for 2020 to 506.8 MT of CO₂e. The updated projection included adopted measures (Pavley 1 fuel efficiency standards, 20 percent Renewable Portfolio Standard requirement), and estimated that an additional 16 percent reduction below the estimated “business as usual” levels would be necessary to return to 1990 levels by 2020.

In 2014, the ARB published its First Update to the Climate Change Scoping Plan. The Update indicates that the State is on target to meet the goal of reducing GHG emissions to 1990 level by 2020. The First Update tracks progress in achieving the goals of AB 32, and lays out a new set of actions that will move the State further along the path to achieving the 2050 goal of reducing emissions to 80 percent below 1990 levels. While the Update discusses setting a mid-term target, the plan does not yet set a quantifiable target toward meeting the 2050 goal.

Senate Bill 97. Senate Bill 97, enacted in 2007, amends the CEQA statute to clearly establish that GHG emissions and the effects of GHG emissions are appropriate subjects for CEQA analysis. It directs Office of Planning and Research (OPR) to develop draft CEQA guidelines “for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions” by July 1, 2009, and directs the Resources Agency to certify and adopt the CEQA guidelines by January 1, 2010.

OPR published a technical advisory on CEQA and climate change on June 19, 2008. The guidance did not include a suggested threshold, but stated that the OPR had asked the ARB to “recommend a method for setting thresholds which will encourage consistency and uniformity in the CEQA analysis of greenhouse gas emissions throughout the state.” The OPR technical advisory does recommend that CEQA analyses include the following components:

- Identification of greenhouse gas emissions;
- Determination of significance; and
- Mitigation of impacts, as needed and as feasible.

On December 31, 2009, the California Natural Resource Agency (CNRA) adopted the proposed amendments to the State CEQA Guidelines. These amendments became effective on March 18, 2010.

Executive Order S-3-05. Executive Order S-3-05, signed by Governor Schwarzenegger on June 1, 2005, calls for a reduction in GHG emissions to 1990 levels by 2020 and for an 80 percent reduction in GHG emissions by 2050. Executive Order S-3-05 also calls for the California EPA (CalEPA) to prepare biennial science reports on the potential impact of continued GCC on certain sectors of the California economy. The first of these reports, *Our Changing Climate: Assessing Risks to California*, and its supporting document *Scenarios of Climate Change in California: An Overview* were published by the California Climate Change Center in 2006.

Executive Order B-30-15. Executive Order B-30-15 was enacted by the Governor on April 29, 2015. Executive Order B-30-15 establishes an interim GHG emission reduction goal for the state of California to reduce GHG emissions to 40 percent below 1990 levels by the Year 2030. This Executive Order directs all state agencies with jurisdiction over GHG-emitting sources to implement measures designed to achieve the new interim 2030 goal, as well as the pre-existing, long-term 2050 goal identified in Executive Order S-3-05 to reduce GHG emissions to 80 percent below 1990 levels by the Year 2050. The Executive Order directs ARB to update its Scoping Plan to address the 2030 goal. It is anticipated that ARB will develop statewide inventory projection data for 2030 and commence efforts to identify reduction strategies capable of securing emission reductions that allow for achievement of the new interim goal for 2030.

Executive Order S-21-09. Executive Order S-21-09 was enacted by Governor Schwarzenegger on September 15, 2009. Executive Order S-21-09 requires that the ARB, under its AB 32 authority, adopt a regulation by July 31, 2010, that sets a 33-percent renewable energy target as established in Executive Order S-14-08. Under Executive Order S-21-09, the ARB will work with the Public Utilities Commission and California Energy Commission to encourage the creation and use of renewable energy sources, and will regulate all California utilities. The ARB will also consult with the Independent System Operator and other load balancing authorities on the impacts on reliability, renewable integration requirements, and interactions with wholesale power markets in carrying out the provisions of the Executive Order. The order requires the ARB to establish highest priority for those resources that provide the greatest environmental benefits with the least environmental costs and impacts on public health.

California Code of Regulations Title 24. Although not originally intended to reduce greenhouse gas emissions, California Code of Regulations Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The GHG emission inventory was based on Title 24 standards as of October 2005; however, Title 24 has been updated as of 2008 and standards are set to be phased in beginning in January 2010. The new Title 24 standards are anticipated to increase energy efficiency by 15 percent, thereby reducing GHG emissions from energy use by 15 percent. Energy efficient buildings require less electricity, natural gas, and other fuels. Electricity production from fossil fuels and on-site fuel combustion (typically for water heating) results in greenhouse gas emissions. Therefore, increased energy efficiency results in decreased greenhouse gas emissions.

The GHG emission inventory was based on Title 24 standards as of October 2005; however, Title 24 has been updated as of 2008 and 2013. The 2013 standards require buildings to be 15 percent more energy-efficient than 2008 standards.

Senate Bill 1078, Senate Bill 107, and Executive Order S-14-08. SB 1078 initially set a target of 20 percent of energy to be sold from renewable sources by the year 2017. The schedule for implementation of the RPS was accelerated in 2006 with the Governor's signing of SB 107, which accelerated the 20 percent RPS goal from 2017 to 2010. On November 17, 2008, the Governor signed Executive Order S-14-08, which requires all retail sellers of electricity to serve 33 percent of their load with renewable energy by 2020. The Governor signed Executive Order S-21-09 on September 15, 2009, which directed ARB to implement a regulation consistent with the 2020 33 percent renewable energy target by July 31, 2010. The 33 percent RPS was adopted in 2010.

State Standards Addressing Vehicular Emissions. California Assembly Bill 1493 (Pavley) enacted on July 22, 2002, required the ARB to develop and adopt regulations that reduce greenhouse gases emitted by passenger vehicles and light duty trucks. Regulations adopted by ARB would apply to 2009 and later model year vehicles. ARB estimated that the regulation would reduce climate change emissions from light duty passenger vehicle fleet by an estimated 18 percent in 2020 and by 27 percent in 2030. Once implemented, emissions from new light duty vehicles are expected to be reduced in San Diego County by up to 21 percent by 2020.

The ARB has adopted amendments to the Pavley regulations that reduce GHG emissions in new passenger vehicles from 2009 through 2016. The amendments, approved by the ARB Board on September 24, 2009, are part of California's commitment toward a nation-wide program to reduce new passenger vehicle GHGs from 2012 through 2016, and prepare California to harmonize its rules with the Federal rules for passenger vehicles.

Executive Order S-01-07. Executive Order S-01-07 was enacted by the Governor on January 18, 2007, and mandates that: 1) a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least ten percent by 2020; and 2) a Low Carbon Fuel Standard (LCFS) for transportation fuels be established for California. According to the SDCGHGI, the effects of the LCFS would be a ten percent reduction in GHG emissions from fuel use by 2020. On April 23, 2009, the ARB adopted regulations to implement the LCFS.

Senate Bill 375. SB 375 finds that GHG from autos and light trucks can be substantially reduced by new vehicle technology, but even so "it will be necessary to achieve significant additional greenhouse gas reductions from changed land use patterns and improved transportation. Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32." Therefore, SB 375 requires that regions with metropolitan

planning organizations adopt sustainable communities strategies, as part of their regional transportation plans, which are designed to achieve certain goals for the reduction of GHG emissions from mobile sources.

SB 375 also includes CEQA streamlining provisions for "transit priority projects" that are consistent with an adopted sustainable communities strategy. As defined in SB 375, a "transit priority project" shall: (1) contain at least 50 percent residential use, based on total building square footage and, if the project contains between 26 and 50 percent nonresidential uses, a floor area ratio of not less than 0.75; (2) provide a maximum net density of at least 20 dwelling units per acre; and (3) be within 0.5 mile of a major transit stop or high quality transit corridor.

Local Regulations and Standards

2050 Regional Transportation Plan. The SANDAG Board of Directors adopted the Regional Plan of record and associated EIR on October 5, 2015. The current Regional Plan, San Diego Forward, consists of an RTP and, as required by SB 375, an SCS that demonstrates how the region would achieve GHG emission reduction targets for passenger vehicles set by CARB. Since SANDAG is required by law to update its RTP every four years, the 2019 Regional Plan represents the next iteration of SANDAG's blueprint of future transportation investments and forecasted regional growth and land use change across the County through 2050. The Cleveland National Forest Foundation (CNFF) and Center for Biological Diversity (CBD) filed a lawsuit on SANDAG's Board of Director's approval of the current Regional Plan and related Program EIR. CNFF and CBD were critical of the Program EIR's description of existing toxic air pollution, analysis of toxic air contaminant-related impacts on public health, and evaluation of GHG emission/demonstration of consistency with GHG reduction goals established in Executive Order S-3-05. While the Supreme Court found that SANDAG did not abuse its discretion by declining to explicitly engage in an analysis of the consistency of projected 2050 GHG emissions with the goals in Executive Order S-3-05, the Supreme Court cautioned that the GHG analysis impacts employed by SANDAG for the 2015 RTP/SCS EIR would not necessarily be sufficient going forward.

City of San Diego Climate Action Plan. In December 2015, the City of San Diego adopted its CAP. The CAP establishes a baseline for 2010, sets goals for GHG reductions for the milestone years 2020 and 2035, and details the implementation actions and phasing for achieving the goals. To implement the State's goals of reducing emissions to 15 percent below 2010 levels by 2020, and 49 percent below 2010 levels by 2035, the City will be required to implement strategies that would reduce emissions to approximately 10.6 MMT CO₂e by 2020 and to 6.4 MMT CO₂e by 2035. The CAP determined that, with implementation of the measures identified therein, the City would exceed the State's targets for 2020 and 2035. The CAP also identifies a comprehensive set of goals, policies, and actions that the City can use to reduce GHG emissions. The CAP includes five strategies: (1) water- and energy-efficient buildings; (2) clean and renewable energy; (3) bicycling, walking, transit, and land use; (4) zero-waste; and (5) climate resiliency.

City of San Diego Climate Action Plan Consistency Checklist. To provide a mechanism for CEQA tiering, the City developed a CAP Consistency Checklist to provide a streamlined review process for GHG emissions for development subject to CEQA. The checklist contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. Implementation of the measures identified in the checklist would ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving identified GHG reduction targets.

City of San Diego General Plan. The City's General Plan includes various goals and policies designed to help result in a reduction in GHG emissions. As discussed in the General Plan, climate change and GHG reduction policies are

addressed in multiple chapters of the General Plan. The goal and policies related to GHG emission relevant to the project are as follows:

Goal: To reduce the City's overall carbon dioxide footprint by improving energy efficiency, increasing use of alternative modes of transportation, employing sustainable planning and design techniques, and providing environmentally-sound waste management.

- Policy CE-A.5** Employ sustainable or "green" building techniques for the construction and operation of buildings.
- (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:
- 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.
- (b) Provide technical services for "green" buildings in partnership with other agencies and organizations.
- Policy CE-A.7** Construct and operate buildings using materials, methods, and mechanical and electrical systems that ensure a healthful indoor air quality. Avoid contamination by carcinogens, volatile organic compounds, fungi, molds, bacteria, and other known toxins.
- (a) Eliminate the use of chlorofluorocarbon-based refrigerants in newly constructed facilities and major building renovations and retrofits for all heating, ventilation, air conditioning, and refrigerant-based building systems.
- (b) Reduce the quantity of indoor air contaminants that are odorous or potentially irritating to protect installers and occupants' health and comfort. Where feasible, select low-emitting adhesives, paints, coatings, carpet systems, composite wood, agrifiber products, and others.
- Policy CE-A.8** Reduce construction and demolition waste in accordance with Public Facilities Element, Policy PF-I.2, or be renovating or adding on to existing buildings, rather than constructing new buildings.
- Policy CE-A.9** 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:

- Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases;
- 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;
- Removing code obstacles to using recycled materials and for construction; and
- Implementing effective economic incentives to recycle construction and demolition debris.

Policy CE-A.10 Include features in buildings to facilitate recycling of waste generated by building occupants and associated refuse storage areas.

- Provide permanent, adequate, and convenient space for individual building occupants to collect refuse and recyclable material.
- 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.

Policy CE-A.11 Implement sustainable landscape design and maintenance.

- Use integrated pest management techniques, where feasible, to delay, reduce, or eliminate dependence on the use of pesticides, herbicides, and synthetic fertilizers.
- 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.
- Strategically plant deciduous shade trees, evergreen trees, and drought tolerant native vegetation, as appropriate, to contribute to sustainable development goals.
- Reduce use of lawn types that require high levels of irrigation.
- Strive to incorporate existing mature trees and native vegetation into site designs.
- Minimize the use of landscape equipment powered by fossil fuels.
- Implement water conservation measures in site/building design and landscaping.
- 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.

5.5.3 Impact Analysis

Issue 1

Would the proposed project generate greenhouse gas emission, either directly or indirectly, that may have a significant impact on the environment?

Issue 2

Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?

Impact Thresholds:

- According to the City's Significance Determination Thresholds, projects that are consistent with the City's CAP, as determined through the CAP Consistency Checklist, would result in a less-than-

significant cumulative impact regarding GHG emissions. If a project is not consistent with the City's CAP, as determined through the CAP Consistency Checklist, potentially significant cumulative GHG impacts would occur.

Impact Analysis

The City's CAP was adopted to ensure that emissions from activities in the City would not exceed established State targets. The CAP assumes a baseline level of construction and buildout of the land use and zoning designation with the CAP's adoption. Land use and zoning designation changes could potentially result in an increase in emissions compared to those assumed in the CAP by allowing a greater intensity of development or allowing land uses that have a higher rate of vehicle trips.

The first step is to assess a project's consistency with the growth projects utilized in the development of the CAP, as determined through the CAP Consistency Checklist. The second step is to review and evaluate a project's consistency with applicable strategies and actions of the CAP. The third step is to determine whether a project with a land use and/or zone designation change within a TPA would be consistent with the assumptions of the CAP. Step 3 would apply if Step 2 is answered in the affirmative under Option B.

Under Step 1 of the CAP Consistency Checklist, the project is consistent with the existing General Plan and Mission Valley Community Plan land use designations and zoning on the site. Therefore, the project is consistent with the growth projections and land use assumptions used in the CAP. Furthermore, completion of Step 2 of the CAP Consistency Checklist demonstrates that the project would be consistent with the applicable strategies and actions for reducing GHG emissions. This includes project features consistent with the energy and water efficient buildings strategy, as well as bicycling, walking, transit, and land use strategy. These project features would be assured as a condition of project approval. Step 3 of the CAP Consistency Checklist would not be applicable, as the project is not proposing a land use amendment or rezone.

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

In addition to project consistency with the CAP Consistency Checklist, the project would also be consistent with the following previously-identified General Plan policies:

- Policy CE-A.5 Employ sustainable or "green" building techniques for the construction and operation of buildings.*
- (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:*
- 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.*

(b) Provide technical services for “green” buildings in partnership with other agencies and organizations.

The project has been submitted under the Sustainable Expedite Program and would provide 50 percent renewable energy on-site for the residential component and 30 percent renewable energy on-site for the commercial component. Additionally, the residential portion of the project would be constructed to LEED Silver for Homes standards.

Policy CE-A-7 Construct and operate buildings using materials, methods, and mechanical and electrical systems that ensure a healthful indoor air quality. Avoid contamination by carcinogens, volatile organic compounds, fungi, molds, bacteria, and other known toxins.

(c) Eliminate the use of chlorofluorocarbon-based refrigerants in newly constructed facilities and major building renovations and retrofits for all heating, ventilation, air conditioning, and refrigerant-based building systems.

(d) Reduce the quantity of indoor air contaminants that are odorous or potentially irritating to protect installers and occupants’ health and comfort. Where feasible, select low-emitting adhesives, paints, coatings, carpet systems, composite wood, agrifiber products, and others.

The project would utilize building materials and methods directed at improving indoor air quality. HVAC units would utilize filters that help screen-out harmful pollutants, operable windows would allow for natural ventilation, and the project’s open courtyards and offsetting planes would allow for air flow through the site.

Policy CE-A.8 Reduce construction and demolition waste in accordance with Public Facilities Element, Policy PF-I.2, or be renovating or adding on to existing buildings, rather than constructing new buildings.

The project would reduce construction and demolition waste in accordance with the LDC and the project’s Waste Management Plan.

Policy CE-A.9 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:

- *Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases;*
- *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;*
- *Removing code obstacles to using recycled materials and for construction; and*
- *Implementing effective economic incentives to recycle construction and demolition debris.*

In accordance with the project's Waste Management Plan, the project would use materials that have recycled content and/or have been derived from sustainable or rapidly renewable sources when possible.

Policy CE-A.10 Include features in buildings to facilitate recycling of waste generated by building occupants and associated refuse storage areas.

- *Provide permanent, adequate, and convenient space for individual building occupants to collect refuse and recyclable material.*
- *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.*

The project would provide refuse storage in accordance with San Diego Municipal Code regulations.

Policy CE-A.11 Implement sustainable landscape design and maintenance.

- (j) Use integrated pest management techniques, where feasible, to delay, reduce, or eliminate dependence on the use of pesticides, herbicides, and synthetic fertilizers.*
- (k) Encourage composting efforts through education, incentives, and other activities.*
- (l) Decrease the amount of impervious surfaces in developments, especially where public places, plazas and amenities are proposed to serve as recreation opportunities.*
- (m) Strategically plant deciduous shade trees, evergreen trees, and drought tolerant native vegetation, as appropriate, to contribute to sustainable development goals.*
- (n) Reduce use of lawn types that require high levels of irrigation.*
- (o) Strive to incorporate existing mature trees and native vegetation into site designs.*
- (p) Minimize the use of landscape equipment powered by fossil fuels.*
- (q) Implement water conservation measures in site/building design and landscaping.*
- (r) 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.*

The project would implement sustainable landscape design and maintenance.

Significance of Impacts

The project would be consistent with the land use and zoning designations of the site. The project would not conflict with the CAP or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases. 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.

Mitigation Measures

Mitigation would not be required.

5.6 Energy

This section provides an evaluation of existing energy production/consumption conditions and potential energy use and related impacts from the project. The following discussion is consistent with and fulfills the intent of CEQA Guidelines Appendix F and is based in part on information obtained from SDG&E (Appendix F, *Letters/Responses to Service Providers*).

5.6.1 Existing Conditions

Energy is regulated by Title 24, Part 6, of California's Energy Efficiency Standards for Residential and Nonresidential Buildings. The Energy Efficiency Standards for Residential and Nonresidential Buildings were established in 1978 in response to a legislative mandate to reduce California's energy consumption. New standards went into effect in October 2005.

SDG&E, a subsidiary of Sempra Energy, provides natural gas and electricity service to the project site. SDG&E provides electrical services to 3.6 million customers through 1.4 million electric meters and 873,000 natural gas meters through the 4,100-square-mile service area in San Diego County and southern Orange County. SDG&E forecasts future natural gas and power consumption demand on a continual basis, primarily for installation of transmission and distribution lines. In situations where projects with large power loads are planned, this is considered together with other loads in the project vicinity, and electrical substations are upgraded as necessary. Direct impacts to electrical and natural gas facilities are addressed and mitigated by SDG&E at the time incoming development projects occur.

Appendix F of the CEQA Guidelines requires that EIRs include a discussion of the potential energy impacts of a proposed project, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. According to Appendix F, the means of achieving energy conservation corresponds to decreasing overall per capita energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources.

Electricity. According to the California Energy Commission's California Energy Consumption Database, California used approximately 282,896 gigawatt hours (2,829 trillion kilowatt hours) of electricity in 2015, which is the most recent year of data available. Electricity usage in California for different land uses varies substantially by the type(s) of uses in a building, type(s) of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building. Due to the State's energy efficiency standards and efficiency and conversion programs, California's per capita electricity use had remained stable for more than 30 years, which the national average has steadily increased.

The State of California produces approximately 82 percent of its electricity and imports the remaining 18 percent. The California Independent System Operator (ISO) governs the transmission of electricity from power plants to utilities. Electricity to San Diego County is transferred via 138 kilo volts (kV) lines at Camp Pendleton, and a 500 kV line near Jacumba. Additionally, there are two operating power plants within San Diego County: Encina (Cabrillo Power) - 965 MW, and the Palomar Energy Power Plant, Escondido (SDG&E) - 550 MW, which began operating in the summer of 2006.

SDG&E receives electric power from a variety of sources. According to the California Public Utilities Commission's 2016 Biennial Renewables Portfolio Standard Program Update, 36.4 percent of SDG&E's power came from eligible renewable sources in 2014, including biomass/waste, geothermal, small hydroelectric, solar, and wind sources.

This is an improvement from the 15.7 percent renewable energy portfolio that SDG&E achieved in 2011. Electricity distribution lines in the project area are located underground. Each year, SDG&E allocates capital funds for the purposes of converting overhead electric distribution lines. Under provisions of Rule 20A established by the California Public Utilities commission, the City may designate major streets for undergrounding the overhead lines. In general, all new commercial, industrial, and residential developments are required to accept the underground service.

In addition, a variety of energy conservation programs are provided by SDG&E to City residents and businesses. These programs include:

- Conducting surveys to determine energy use and recommending energy efficiency measures to reduce energy use;
- Providing discounts for retrofitting lighting, refrigeration, and mechanical equipment with energy efficient technologies; and
- Incentives for using energy during non-peak hours to reduce peak-hours demand.

Title 24 of the California Administrative Code sets efficiency standards for new construction, regulating energy consumed for heating, cooling, ventilations, water heating, and lighting. These building efficiency standards are enforced through the City's building permit process.

Currently, the Witt Mission Valley project site is developed with commercial automotive dealership sales and offices (Witt Lincoln), service bays, and exterior auto sales areas totaling 38,070 square feet (see Figure 2-4, *Existing Site Conditions*). Electricity demand associated with existing development is estimated to be 316,362 kilowatt hours per year (kWH/year).

SDG&E facilities surround the project site within public streets. There are existing electric lines undergrounded in Camino de la Reina along the project frontage. SDG&E has the capacity to meet the present demand for electrical service, and there are no service deficiencies in the existing distribution system (see Appendix F).

Natural Gas. Natural gas sources for the California include in-state sources (16 percent), Canada (28 percent), the Rockies (10 percent), and the Southwest (46 percent). Gas from outside sources enter the state through large high-pressure gas lines. These transmission lines feed natural gas storage areas located in Orange and northern Los Angeles counties, which serve all of southern California. From these storage facilities, high-pressure gas transmission lines enter San Diego County from the north inland area (Rainbow area). A 30-inch transmission line veers to the coast, and a 16-inch line continues inland.

Currently, the Witt Mission Valley project site is developed with commercial automotive dealership sales and offices (Witt Lincoln), service bays, and exterior auto sales areas totaling 38,070 square feet (see Figure 2-4, *Existing Site Conditions*). Natural gas use associated with existing development is estimated to be 440,089 thousand British thermal units (kBTU) per year.

According to SDG&E, the current natural gas distribution system is in good operating condition and is adequate to meet the current demand. No improvements are planned at this time.

Petroleum. There are more than 27 million registered vehicles in California, and those vehicles consumed an estimated 18.5 billion gallons of petroleum and diesel in 2014, according to the California Energy Commission.

Gasoline and other vehicle fuels are commercially provided commodities, and would be available to the project via commercial outlets.

Petroleum accounts for approximately 92 percent of California's transportation energy sources. Technological advances, market trends, consumer behavior, and government policies could result in significant changes to fuel consumption by type and total. At the Federal and State levels, various policies, rules, and regulations have been enacted to improve vehicle fuel efficiency, promote the development and use of alternative fuels, reduce transportation-source air pollutants and GHG emissions, and reduce VMT. Market forces have driven the price of petroleum products steadily upward, and technological advances have made use of other energy resources or alternative transportation modes increasingly feasible.

5.6.2 Regulatory Framework

Federal

Federal Energy Regulatory Commission. The Federal Energy Regulatory Commission is an independent agency that regulates the transmission and sales of electricity, natural gas, and oil in interstate commerce, licensing of hydroelectric projects, and oversight of related environmental matters. The setting and enforcing of interstate transmission sales is also regulated by Federal Energy Regulatory Commission.

Federal Energy Policy and Conservation Act. In 1975, Congress enacted the Federal Energy Policy and Conservation Act to serve the nation's energy demands and promote feasibly attainable conservation methods. This act established the first fuel economy standards for on-road motor vehicles in the United States. Pursuant to the act, the National Highway Traffic Safety Administration is responsible for establishing additional vehicle standards. In 2012, new fuel economy standards were approved for model year 2017 passenger cars and light trucks at 54.5 miles per gallon. Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

Intermodal Surface Transportation Efficiency Act of 1991. The Intermodal Surface Transportation Efficiency Acts of 1991 (ISTEA) promoted the development of intermodal transportation systems to maximize mobility, as well as address national and local interests in air quality and energy. ISTEA contained factors that metropolitan planning organizations were to address in development transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, metropolitan planning organizations adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions.

The Transportation Equity Act for the 21st Century. The Transportation Equity Act for the 21st Century (TEA-21) was signed into law in 1998 and builds on the initiatives established in the ISTEA legislation, discussed above. TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of good transportation decisions. TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety.

Energy Policy Act of 2005. The Energy Policy Act of 2005 addresses energy production in the United States, including (1) energy efficiency; (2) renewable energy; (3) oil and gas; (4) coal; (5) tribal energy; (6) nuclear matters and security; (7) vehicles and motor fuels, including ethanol; (8) hydrogen; (9) electricity; (10) energy tax incentives; (11) hydropower and geothermal energy; and (12) climate change technology. The act includes provisions such as increasing the amount of biofuel that must be mixed with gasoline sold in the United States and loan guarantees for entities that develop or use innovative technologies that avoid the by-production of GHGs.

Energy Independence and Security Act of 2007. On December 19, 2007, the Energy Independence and Security Act of 2007 (EISA) was signed into law. In addition to setting increased Corporate Average Fuel Economy standards for motor vehicles, the EISA includes other provisions related to energy efficiency:

- Renewable Fuel Standard (Section 202)
- Appliance and Lighting Efficiency Standard (Sections 301-325)
- Building Energy Efficiency (Sections 411-441)

This Federal legislation requires ever-increasing levels of renewable fuels – the RFS – to replace petroleum. The EPA is responsible for developing and implementing regulations to ensure that transportation fuel sold in the United States contains a minimum volume of renewable fuel. The RFS program regulations were developed in collaboration with refiners, renewable fuel producers, and many other stakeholders.

The RFS program was created under the Environmental Policy Act of 2005 and established the first renewable fuel volume mandate in the United States. As required under the Act, the original RFS program (RFS1) required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. Under the EISA, the RFS program was expanded in several key ways that lay the foundation for achieving significant reductions of GHG emissions from the use of renewable fuels, for reducing imported petroleum, and encouraging the development and expansion of the nation's renewable fuels sector. The updated program is referred to as RFS2 and includes the following:

- EISA expanded the RFS program to include diesel, in addition to gasoline.
- EISA increased the volume of renewable fuel required to be blended into transportation fuel from nine billion gallons in 2008 to 36 billion gallons by 2022.
- EISA established new categories of renewable fuel and set separate volume requirements for each one.
- EISA required the EPA to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces.

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green” jobs.

Leadership in Energy and Environmental Design. The U.S. Green Building Council (USGBC) is committed to transforming the way buildings are designed, constructed, and operated through the LEED certification program. LEED acts as a certification program for buildings and communities to guide their design, construction, operations and maintenance toward sustainability. LEED is based on prerequisites and credits that a project meets in order to achieve a certification level or Certified, Silver, Gold, or Platinum.

State

California Code of Regulations Title 13, Section 2449(d)(3) and 2485. ARB is responsible for enforcing CCR Title 13 Sections 2449(d)(3) and 2485, which limit idling from both on-road and off-road diesel-powered equipment.

California's Energy Efficiency Standards for Residential and Nonresidential Buildings. Located in CCR Title 24, Part 6 and commonly referred to as "Title 24," these energy efficiency standards were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The goal of Title 24 energy standards is the reduction of energy use. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. On October 24, 2015, the California Energy Commission (CEC) adopted the 2016 Building and Energy Efficiency Standards with the effective date of the 2016 Standards beginning January 1, 2017. CEC estimates that implementation of the 2016 Building Energy Efficiency Standards have the potential to reduce statewide annual electricity consumption by approximately 281 gigawatt-hours per year, electrical peak demand by 195 megawatts, and natural gas consumption by 16 million therms per year.

Title 24 also includes Part 11, known as California's Green Building Standards (CALGreen). The CALGreen standard took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up new construction of commercial, low-rise residential, and State-owned buildings, as well as schools and hospitals. The 2016 CALGreen standards became effective on January 1, 2017. The mandatory standards require:

- 20 percent mandatory reduction in indoor water use.
- 50 percent construction and demolition waste must be diverted from landfills.
- Mandatory inspections of energy systems to ensure optimal working efficiency.
- Low-pollutant-emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring, and particle boards.

Energy Action Plan II. The CEC, California Power Authority, and California Public Utilities Commission (CPUC) adopted an Energy Action Plan (EAP) to establish goals for California's energy future and a means to achieve these goals. EAP II supports and expands on the commitment of State agencies to cooperate and reflect on the energy actions since original EAP adoption. EAP II includes a coordinated implementation plan for state energy policies that have been articulated through EOs, instructions to agencies, public positions, and appointees' statements; CEC's Integrated Energy Policy Report; CPUC and CEC processes; agencies' policy forums; and legislative direction.

Integrated Energy Policy Report. The CEC is responsible for preparing Integrated Energy Policy Reports, which identify emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The CEC's 2015 Integrated Energy Policy Report discusses the State's policy goal to require that new residential construction be designed to achieve zero-net-energy standards by 2020, and that new non-residential construction follow by 2030.

Renewable Portfolio Standards. As most recently amended by Senate Bill 350, the Renewable Portfolio Standard requires an annual increase in renewable energy generation by utility providers equivalent to at least 33 percent by 2020 and 50 percent by 2050. (Interim Renewable Portfolio Standard targets also are set between 2020 and 2030.)

State Vehicle Standards. The CARB Advanced Clean Cars program for passenger vehicles – cars and light trucks – serves to reduce petroleum consumption by increasing the operating efficiencies of vehicles and accelerating the penetration of plug-in hybrid and zero-emission vehicles in California. CARB has also adopted regulations that enhance the operating efficiencies of various types of construction equipment. While such regulations primarily are adopted to reduce air pollution, co-benefits – in the form of reduced petroleum consumption – are common.

Sustainable Communities Strategy. The Sustainable Communities and Climate Protection Act of 2008, or Senate Bill 375, coordinates land use planning, regional transportation plans, and funding priorities to help California meets its GHG emissions reduction mandates. As specifically codified in Government Code Section 65080, SB 375 requires the Metropolitan Planning Organization relevant to the project area (in this case, SANDAG) to include a SCS in its RTP. While the main focus of the SCS is to plan for growth that will ultimately reduce GHG emissions, the strategy is also part of a bigger effort to address many other development issues within the general vicinity, including transit and VMT.

Local

SANDAG Regional Energy Strategy. The Regional Energy Strategy (RES) serves as the energy policy blueprint for the San Diego region through 2050. It established long-term goals in 11 topic areas including energy efficiency, renewable energy, distributed generation, transportation fuels, land use and transportation planning, border energy issues, and the green economy. Using the strategic guiding principles, and taking into consideration the myriad of policy measures recommended across the energy topics, the following six early actions were identified for SANDAG and local governments to focus on in the near term:

1. Pursue a comprehensive building retrofit program to improve efficiency and install renewable energy systems.
2. Create financing programs to pay for projects and improvements that save energy.
3. Utilize the SANDAG-SDG&E Local Government Partnership to help local governments identify opportunities and implement energy savings at government facilities and throughout their communities.
4. Support land use and transportation planning strategies that reduce energy use and GHG emissions.
5. Support planning of electric charging stations and alternative fueling infrastructure.
6. Support use of existing unused reclaimed water to decrease the amount of energy needed to meet the water needs of the San Diego region.

In 2014, a technical update of the RES was completed in order to inform development of San Diego Forward: The Regional Plan. This technical update demonstrates progress toward attaining the RES goals, updates existing conditions and future projects data, and recommends priorities for moving forward. Concurrent with the update, summary reports were prepared for each of the RES goals.

SDG&E Long-Term Resource Plan. In 2004, SDG&E filed a long-term energy resource plan (LTRP) with the CPUC, which identifies how SDG&E will meet the future energy needs of customers in the service area. The LTRP identifies several energy demand reduction (i.e., conservation) targets, as well as goals for increasing renewable energy supplies, new local power generation, and increased transmission capacity.

The LTRP set a standard for acquiring 20 percent of SDG&E's energy mix from renewables by 2010 and 33 percent by 2020. The LTRP also calls for greater use of in-region energy supplies, including renewable energy installations. By 2020, the LTRP states that SDG&E intends to achieve and maintain the capacity to generate 75 percent of

summer peak demand with in-county generation. The LTRP also identifies the procurement of 44 percent of its renewables to be generated and distributed in-region by 2020.

General Plan. The City of San Diego adopted an updated General Plan in 2008. The following policies contained in the Conservation Element of the General Plan are applicable to the project:

- CE-A.2. Reduce the City's carbon footprint. Develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth in the General Plan to:
 - Create sustainable and efficient land use patterns to reduce vehicular trips and preserve open space;
 - Reduce fuel emission levels by encouraging alternative modes of transportation and increasing fuel efficiency;
 - Improve energy efficiency, especially in the transportation sector and buildings and appliances;
 - Reduce the Urban Heat Island effect through sustainable design and building practices;
 - Reduce waste by improving management and recycling programs.
- CE-A.5. Employ sustainable or "green" building techniques for the construction and operation of buildings.
 - 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.

Climate Protection Plan. The City of San Diego adopted a CAP in December 2015 (City of San Diego 2015). The CAP quantifies GHG emissions, establishes citywide reduction targets for 2020 and 2035, identifies strategies and measures to reduce GHG levels, and provides guidance for monitoring progress on an annual basis. The City of San Diego CAP identifies a comprehensive set of goals and actions, including ordinances, policies, resolutions, programs, and incentives, that the City can use to reduce GHG emissions.

5.6.3 Impact Analysis

Issue 1

Would the construction and operation of the proposal result in the use of excessive amounts of electrical power?

Issue 2

Would the proposal result in the use of excessive amounts fuel or other forms of energy (including natural gas, oil, etc.)?

Impact Thresholds:

Consistent with CEQA Guidelines Appendix F, a project would result in a significant impact to energy conservation if it would:

- Substantially increase the consumption of electricity, natural gas, gasoline, diesel, or other non-renewable energy types such that the construction of new facilities and sources of energy or major improvements to local infrastructure would be required; or
- Cause the use of large amounts of electricity and natural gas in a manner that is wasteful or otherwise inconsistent with adopted plans or policies.

Impact Analysis

The project site has been developed with commercial auto dealership and sales offices, service bays, and exterior auto sales areas with surface parking lots. Therefore, electricity and natural gas facilities exist at the project site to serve the proposed uses.

Electricity

Construction. Temporary electrical power for as-necessary lighting and electronic equipment, such as computers inside temporary construction trailers, would be provided by SDG&E. The amount of electricity used during construction would be minimal because typical demand stems from the use of several construction trailers that are used by managerial staff during the hours of construction activities in addition to electrically-powered hand tools. Most energy used during construction would be from petroleum. The electricity used for such activities would be temporary and negligible.

Operation. SDG&E has indicated that the current energy system would be sufficient to service the project, and that SDG&E would serve the project. A letter from SDG&E states SDG&E gas and electric services can be made available for the project (see Appendix F). No adverse effects to non-renewable energy resources are anticipated with development of the project site as proposed by the project. Furthermore, the project would not result in the use of excessive amounts of fuel or electricity and would not result in the need to develop additional sources of energy. While energy use at the project would not be excessive, the project would incorporate several measures directed at minimizing energy use. These include:

- ENERGYSTAR® Windows and kitchen appliances
- Energy Efficient Air Conditioning and Heating
- 3rd Party Performance Testing and Inspections of Design and Equipment
- Retrofit for Ceiling Fans in all living areas
- Energy Efficient Lighting
- Programmable Thermostats

The project would generate the demand for approximately 1,482,402 kWh of annual energy use for the residential component and 259,917 kWh of annual energy use for the commercial components. The project is being processed via the Sustainable Building Expedite Program. In order to qualify as a Sustainable Building Expedite Project, the project is required to provide 50 percent of residential energy use from renewable sources and 30 percent of commercial energy use from renewal sources. The project would utilize photovoltaic panels to provide solar power on-site. Solar power would be provided to offset project energy use by the amounts required for the Sustainable Building Expedite Program (50 percent offset for residential uses and 30 percent offset for commercial uses). As such, solar energy on-site would provide for 741,201 kWh of annual residential energy use and 77,975 kWh of annual commercial use, thereby lowering energy demand that would be generated by the project. In addition to meeting the requirements of the Sustainable Building Expedite Program, these offsets account for 47 percent of the overall energy use on-site.

Natural Gas

Construction. Natural gas is not anticipated to be required during construction of the project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed under the “petroleum” subsection,

below. Any minor amounts of natural gas that may be consumed as a result of project construction would be temporary and negligible and would not have an adverse effect.

Operation. Natural gas would be directly consumed throughout the operation of the project, primarily through building heating, water heating, and cooking. Natural gas consumption was estimated for each of the project's land uses based on the CalEEMod default values. Based on these calculations, the project is estimated to consume approximately 2,143,824 thousand British thermal units (kBtu) of natural gas per year during operation (2,057,760 kBtu consumption for residential component, 13,380 kBtu consumption from commercial retail component, and 72,684 kBtu consumption from commercial office use).

As such, the project would result in a long-term increase in demand for natural gas. However, the project would be designed to comply with Title 24, Part 6, of the CCR, as well as LEED Silver for Homes and the CAP. Due to the size and scale of the project, natural gas consumption would be appropriate and not place a significant burden on SDG&E's services.

Petroleum

Construction.

Petroleum would be consumed throughout construction of the project. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction, while VMT associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. Heavy-duty equipment used for project construction would rely on diesel fuel, as would haul trucks involved in off-hauling materials from demolition and excavation. Construction workers would travel to and from the project site throughout the duration of construction. It is assumed that construction workers would travel to and from the project site in gasoline-powered passenger vehicles. There are 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).

Heavy-duty construction equipment of various types would be used during each phase of construction. CalEEMod was used to estimate construction equipment usage. Fuel consumption from construction equipment was estimated by converting the total CO₂ emissions from each construction phase to gallons using the conversion factors shown in the tables included below. Table 5.6-1, *Construction Worker Gasoline Demand*, illustrates the demand of gasoline for construction worker trips to and from the site for the various construction phases. Construction worker demand equals a total of 33,230 gallons of gasoline.

Table 5.6-1. Construction Worker Gasoline Demand

Phase	Days	Trips	VMT	Kg CO ₂ e	Kg/CO ₂ /Gallon	Gallons
<i>Demolition</i>	20	300	3,240	998	8.78	113
<i>Site Preparation</i>	10	180	1,944	544	8.78	61
<i>Grading</i>	30	600	6,480	1,995	8.78	227
<i>Building Const.</i>	300	86,100	929,880	283,891	8.78	32,332
<i>Paving</i>	20	300	3,240	907	8.78	103
<i>Arch. Coating</i>	20	1,140	12,312	3,537	8.78	403
Total						33,239

Table 5.6-2, *Construction Vendor Diesel Fuel Demand*, illustrates the demand of diesel fuel for construction vendor trips to and from the site. These trips are associated with the delivery of construction materials during the construction phase. Construction vendor demand equals a total of 22,475 gallons of diesel fuel.

Table 5.6-2. Construction Vendor Diesel Fuel Demand

Phase	Days	Trips	VMT	Kg CO2e	Kg/CO2/Gallon	Gallons
<i>Demolition</i>	20	0	0	0	0	0
<i>Site Preparation</i>	10	0	0	0	0	0
<i>Grading</i>	30	0	0	0	0	0
<i>Building Const.</i>	300	64	140,160	229,471	10.21	22,475
<i>Paving</i>	20	0	0	0	0	0
<i>Arch. Coating</i>	20	0	0	0	0	0
Total						22,475

Table 5.6-3, *Construction Haul Diesel Fuel Demand*, illustrates the demand of diesel fuel for construction hauler trips to and from the site. These trips are associated with the hauling away of materials during the demolition phase. Construction haul diesel demand equals a total of 3,909 gallons of diesel fuel.

Table 5.6-3. Construction Haul Diesel Fuel Demand

Phase	Days	Trips	VMT	Kg CO2e	Kg/CO2/Gallon	Gallons
<i>Demolition</i>	20	1,136	22,720	39,908	10.21	3,909
<i>Site Preparation</i>	10	0	0	0	0	0
<i>Grading</i>	30	0	0	0	0	0
<i>Building Const.</i>	300	0	0	0	0	0
<i>Paving</i>	20	0	0	0	0	0
<i>Arch. Coating</i>	20	0	0	0	0	0
Total						3,909

Table 5.6-4, *Construction Equipment Diesel Fuel Demand*, illustrates the demand of diesel fuel for construction vehicles on-site during the various construction phases. Construction equipment diesel demand equals a total of 44,308 gallons of diesel fuel.

Table 5.6-4. Construction Equipment Diesel Fuel Demand

Phase	Days	Equipment Units	Kg CO2e	Kg/CO2/Gallon	Gallons
<i>Demolition</i>	20	6	30,838	10.21	3,020
<i>Site Preparation</i>	10	7	15,419	10.21	1,510
<i>Grading</i>	30	8	76,188	10.21	7,462
<i>Building Const.</i>	300	9	316,543	10.21	31,003
<i>Paving</i>	20	6	11,140	10.21	1,091
<i>Arch. Coating</i>	20	1	2,268	10.21	222
Total					44,308

In summary, the project is estimated to consume approximately 33,239 gallons of gasoline and 70,692 gallons of diesel fuel during the project's construction phases, totaling 103,931 gallons of petroleum to be consumed. Petroleum use is necessary to operate construction equipment, and construction equipment would employ Tier 3 engines or higher (and thus would be newer off-road equipment units). Additionally, energy used during construction of the project would be limited to the construction period, and would not involve long-term

petroleum use. As such, energy consumption during construction activities would not be considered excessive, inefficient, or unnecessary. Additionally, demand for jobs in the project vicinity demonstrates that the proposed construction would not be considered unnecessary.

As noted above, there are 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). Thus, project construction would not consume petroleum in a wasteful or inefficient manner.

Operation.

The project would have an estimated annual VMT of 5,588,048. The average daily trip rate for weekdays is 2,148 VMT, 2,031 on Saturdays, and 1,750 on Sundays. Total mobile source CO₂e is 2,340 MT or 211,238 kg. CalEEMod assumes 92.5 percent of VMT burns gasoline while the remaining 7.5 percent burn diesel. Thus, of the 2,340 MT of mobile emissions, 2,165 MT is generated by gasoline combustion and 175 MT from diesel combustion. The project would have an annual gasoline demand of 223,651 gallons and an annual diesel demand of 15,546 gallons.

Over the lifetime of the project, the fuel efficiency of vehicles in use is expected to increase, as older vehicles within the fleet mix are replaced with newer, more efficient models. Thus, the amount of petroleum consumed as a result of vehicle trips to and from the project site during operation would decrease over time. There are numerous regulations in place that require and/or encourage increased fuel efficiency. For example, CARB has adopted a new approach to passenger vehicles by combining the control for smog-causing pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emissions vehicles in California. As such, operation of the project is expected to use decreasing amounts of petroleum over time, due to advances in fuel economy.

In summary, although the project would result in an increase in petroleum use during construction and operation compared to the existing conditions, the project would implement measures required under the CAP Checklist regarding VMT reduction through the voluntary implementation of a TDM program. Additionally, project-specific petroleum use would be expected to diminish over time as fuel efficiency improves and due to the project's walkability and proximity to transit and active transportation networks. Given these considerations, petroleum consumption associated with the project operation would not be considered excessive.

Significance of Impacts

The project would increase demand for energy in the project area and SDG&E's service area. However, no adverse effects on non-renewable resources are anticipated. The project would follow UBC and Title 24 requirements for energy efficiency and would incorporate sustainable design features directed at reducing energy consumption.

Mitigation Measures

Mitigation would not be required.

5.7 Noise

This section evaluates potential noise impacts associated with the project. The following discussion is based on the *Exterior Noise Analysis Report* prepared by dBf Associates, Inc. (April 3, 2018), included as Appendix G.

5.7.1 Existing Conditions

NOISE BACKGROUND

Noise is generally defined as loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity and that interferes with or disrupts normal activities. The human environment is characterized by a certain consistent noise level that varies by location and is termed ambient noise. Although exposure to high noise levels has been demonstrated to cause hearing loss, the principal human response to environmental noise is annoyance. The response of individuals to similar noise events is diverse and influenced by the type of noise, perceived importance of the noise and its appropriateness in the setting, time of day and type of activity during which the noise occurs, and sensitivity of the individual.

Sound is a physical phenomenon consisting of minute vibrations that travel through a medium, such as air, and are sensed by the human ear. Sound is generally characterized by several variables, including frequency and intensity. Frequency describes the sound's pitch and is measured in cycles per second, or hertz (Hz), whereas intensity describes the sound's loudness and is measured in decibels (dB). Decibels are measured using a logarithmic scale. A sound level of 0 dB is approximately the threshold of human hearing and is barely audible under extremely quiet listening conditions. Normal speech has a sound level of approximately 60 dB. Sound levels above about 120 dB begin to be felt inside the human ear as discomfort and eventually as pain at still higher levels. The minimum change in the sound level of individual events that an average human ear can detect is about 3 dB. The average person perceives a change in sound level of about 10 dB as a doubling (or halving) of the sound's loudness; this relation holds true for sounds of any loudness. Sound levels of typical noise sources and environments are provided in Table 5.7-1, *Sound Levels of Typical Noise Sources and Noise Environments*.

The normal human ear can detect sounds that range in frequency from about 20 Hz to 20,000 Hz. However, all sounds in this wide range of frequencies are not heard equally well by the human ear, which is most sensitive to frequencies in the range of 1,000 Hz to 4,000 Hz. This frequency dependence can be taken into account by applying a correction to each frequency range to approximate the human ear's sensitivity within each range. This is called A-weighting and is commonly used in measurements of community environmental noise. The A-weighted sound pressure level (abbreviated as dBA) is the sound level with the "A-weighting" frequency correction. In practice, the level of a noise source is conveniently measured using a sound level meter that includes a filter corresponding to the dBA curve.

Another metric known as the CNEL adds a 5-dB adjustment to sound levels during evening hours (7:00 PM to 10:00 PM) in addition to a 10-dB adjustment to sound levels during nighttime hours (10:00 PM to 7:00 AM). CNEL is used by the State of California to evaluate land-use compatibility with regard to noise.

Table 5.7-1. Sound Levels of Typical Noise Sources and Noise Environments

Noise Source (at Given Distance)	Noise Environment	A-Weighted Sound Level	Human Judgment of Noise Loudness (Relative to Reference Loudness of 70 Decibels*)
Military Jet Takeoff with Afterburner (50 ft)	Carrier Flight Deck	140 Decibels	128 times as loud
Civil Defense Siren (100 ft)		130	64 times as loud
Commercial Jet Take-off (200 ft)		120	32 times as loud Threshold of Pain
Pile Driver (50 ft)	Rock Music Concert Inside Subway Station (New York)	110	16 times as loud
Ambulance Siren (100 ft) Newspaper Press (5 ft) Gas Lawn Mower (3 ft)		100	8 times as loud Very Loud
Food Blender (3 ft) Propeller Plane Flyover (1,000 ft) Diesel Truck (150 ft)	Boiler Room Printing Press Plant	90	4 times as loud
Garbage Disposal (3 ft)	Noisy Urban Daytime	80	2 times as loud
Passenger Car, 65 mph (25 ft) Living Room Stereo (15 ft) Vacuum Cleaner (10 ft)	Commercial Areas	70	Reference Loudness Moderately Loud
Normal Speech (5 ft) Air Conditioning Unit (100 ft)	Data Processing Center Department Store	60	1/2 as loud
Light Traffic (100 ft)	Large Business Office Quiet Urban Daytime	50	1/4 as loud
Bird Calls (distant)	Quiet Urban Nighttime	40	1/8 as loud Quiet
Soft Whisper (5 ft)	Library and Bedroom at Night Quiet Rural Nighttime	30	1/16 as loud
	Broadcast and Recording Studio	20	1/32 as loud Just Audible
		0	1/64 as loud Threshold of Hearing

Source: Compiled by dBf Associates, Inc.

VIBRATION BACKGROUND

Vibration is defined as any oscillatory motion induced in a structure or mechanical device as a direct result of some type of input excitation. Input excitation, generally in the form of an applied force or displacement, is the mechanism required to start some type of vibratory response. Sources of earthborne vibrations include natural phenomena (earthquakes, volcanic eruptions, sea waves, landslides, etc.) or manmade (explosions, machinery, traffic, construction equipment, etc.). Vibration sources may be transient, steady-state or continuous, or pseudo steady-state. Examples of transient construction vibrations are those that occur from blasting with explosives, impact pile driving, demolition, and wrecking balls. Steady-state vibrations may be generated by vibratory pile drivers. Pseudo steady-state vibrations are of a random nature, but at short enough intervals to approach a steady-state condition. These include jackhammers, pavement breakers, trucks, bulldozers, cranes, and scrapers.

Groundborne vibration propagates from the source through the ground to adjacent buildings by surface waves. Vibration may be comprised of a single pulse, a series of pulses, or a continuous oscillatory motion. The frequency of a vibrating object describes how rapidly it is oscillating, measured in Hz. Most environmental vibrations consist of a composite, or "spectrum" of many frequencies, and are generally classified as broadband or random

vibrations. The normal frequency range of most groundborne vibration that can be felt generally starts from a low frequency of less than 1 Hz to a high of about 200 Hz.

Vibration data in this study is expressed in terms of the peak particle velocity (PPV) in inches per second (in/sec). The PPV is the velocity of the soil particles resulting from a disturbance. Agencies such as the State of California Department of Transportation (Caltrans) use the PPV descriptor to evaluate the potential for building damage and human annoyance.

5.7.2 Regulatory Framework

Federal

The Federal Transit Administration (FTA) and FHWA provide noise and vibration guidelines for project construction including vibration thresholds for structural damage and human annoyance, and maximum noise levels and usage factors for construction equipment.

State of California

Multi-Family Residential

CBC, Chapter 12: Interior Environment, Section 1207: Sound Transmission regulates noise levels in buildings with multiple habitable units. Relevant portion is reproduced below.

1207.4 Allowable interior noise levels. Interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric shall be either the day-night average sound level (Ldn) or the CNEL, consistent with the noise element of the local general plan.

Non-residential

The California Green Building Standards Code ("Green Code") [State of California 2016] limits noise within non-residential buildings. Relevant portion is reproduced below.

5.507.4.2 Performance method. For buildings located as defined in Section 5.507.4.1 or 5.507.4.1.1 (exposed to a noise level of 65 dB equivalent continuous sound level (Leq)-1hr during any hour of operation), wall and roof-ceiling assemblies exposed to the noise source making up the building or addition envelope or altered envelope shall be constructed to provide an interior noise environment attributable to exterior sources that does not exceed an hourly equivalent noise level (Leq-1hr) of 50 dBA in occupied areas during any hour of operation.

Municipal Code

Operational Noise

Operational noise within the City is governed by Municipal Code Section 59.5.401: Sound Level Limits. This code section prohibits one-hour average sound levels that exceed the *Table of Applicable Limits* (Table 5.7-2) limitations.

The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts. Permissible construction noise level limits shall be governed by Section

59.5.0404 of this article. The project site would include multi-family residences and commercial offices. Surrounding land uses include multi-family residences, offices, and commercial spaces.

At boundary lines between commercial land uses, the operational sound level limits are:

- 65 dBA Leq during daytime hours (7:00 AM to 7:00 PM), and
- 60 dBA Leq during evening and nighttime hours (7:00 PM to 7:00 AM).

Table 5.7-2. Table of Applicable Limits

Land Use	Time of Day	One-Hour Average Sound Level (decibels)
1. Single Family Residential	7 AM to 7 PM	50
	7 PM to 10 PM	45
	10 PM to 7 AM	40
2. Multi-Family Residential (up to a maximum density of 1/2000)	7 AM to 7 PM	55
	7 PM to 10 PM	50
	10 PM to 7 AM	45
3. All other Residential	7 AM to 7 PM	60
	7 PM to 10 PM	55
	10 PM to 7 AM	50
4. Commercial	7 AM to 7 PM	65
	7 PM to 10 PM	60
	10 PM to 7 AM	60
5. Industrial or Agricultural	any time	75

At boundary lines between multi-family residential and commercial land uses, the operational sound level limits are:

- 60 dBA Leq during daytime hours (7:00 AM to 7:00 PM),
- 55 dBA Leq during evening hours (7:00 PM to 10:00 PM), and
- 52.5 dBA Leq during nighttime hours (10:00 PM to 7:00 AM).

At boundary lines between multi-family residential land uses, the operational sound level limits are:

- 55 dBA Leq during daytime hours (7:00 AM to 7:00 PM),
- 50 dBA Leq during evening hours (7:00 PM to 10:00 PM), and
- 45 dBA Leq during nighttime hours (10:00 PM to 7:00 AM).

Construction Noise

Construction noise within the City is governed by Municipal Code Section 59.5.0404: Construction Noise. This code section prohibits construction between the hours of 7:00 P.M. and 7:00 A.M.; on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with some exceptions; or on Sundays. Additionally, construction is prohibited from causing noise in excess of 75 dB during the 12-hour period from 7:00 A.M. to 7:00 P.M. at or beyond the property lines of any property zoned residential. The provision of this code section do not apply to construction equipment used in connection with emergency work, provided the Administrator is notified within 48 hours after commencement of work.

Refuse Vehicles and Parking Lot Sweepers

Refuse vehicle and parking lot sweeper noise within the City is governed by Municipal Code Section 59.5.0406: Refuse Vehicles and Parking Lot Sweepers. Per this code section, refuse compacting, processing, or collection vehicles cannot operate in any residential area unless a permit has been applied for and granted between 7:00 P.M. and 6:00 A.M. Parking lot sweepers may not operate in any residential area unless a permit has been applied for and granted between 7:00 P.M. and 7:00 A.M.

VIBRATION

The City of San Diego does not regulate vibration. In the absence of local regulations, Caltrans guidance was consulted. Relative to vibration produced by other construction equipment, review of available literature by Caltrans indicates that there is limited information available on vibration source levels from general construction equipment. The most comprehensive list of vibration source amplitudes is provided in the document entitled Transit Noise and Vibration Impact Assessment (Federal Transit Administration 2006). This document lists vibration source amplitudes at 25 feet for various types of construction equipment, summarized in the table below.

Vibration Source Amplitudes for Construction Equipment

Equipment	Reference Peak Particle Velocity (PPV) at 25 feet (in/sec)
Vibratory roller	0.210
Large bulldozer	0.089
Caisson drilling	0.089
Loaded trucks	0.076
Jackhammer	0.035
Small bulldozer	0.003
Crack-and-seat operations	2.4

Sources: Federal Transit Administration, 1995 (except Hanson, 2001 for vibratory rollers) and Caltrans, 2000 for crack-and-seat operations

In evaluating potential vibration impacts, there is limited consistency between the categorization of effects and damage thresholds; damage thresholds for continuous sources are less than those for single-event or transient sources. It is also apparent that the vibration from traffic is continuous and that vibration from a single blasting event is a single transient event; however, many types of construction activities fall between a single event and a continuous source. An impact pile driver, for example, continuously generates single transient events. As a practical matter and based on the nature of available criteria, the criteria can only be reasonably separated into two categories: continuous and transient.

To assess the damage potential from ground vibration induced by construction equipment, a synthesis of various vibration criteria has been developed by Caltrans. This synthesis of criteria essentially assumes that the threshold for continuous sources is about half of the threshold for transient sources. The table below provides guidelines for vibration damage potential threshold criteria.

Guideline Vibration Damage Potential Threshold Criteria

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

EXISTING NOISE ENVIRONMENT

The project site is located north of I-8 and Camino del Rio North, east of SR 163 and Camino de la Siesta, and south of Camino de la Reina, in the Mission Valley community of the City of San Diego. Office development occurs to the west of the project site, multi-family residential to the north, the Millennium Mission Valley mixed-use development under construction to the east, and I-8 to the south. The project site is currently developed with commercial auto sales offices, service bays, and exterior auto sales areas with surface parking lots.

The primary noise source affecting the project site is roadway traffic on I-8. Roadway traffic on SR 163, the interchange ramps between I-8 and SR 163, and surface streets also contributes to the on-site noise environment.

The project site is within the AIA Review Area 2 but outside the existing 60 dBA CNEL noise contour of San Diego International Airport. The project site is within the AIA Review Area 2 but outside the existing 60 dBA CNEL noise contour of Montgomery Field.

Existing structures partially shield the project site from portions of the nearby roadways: the ten-story “TD Ameritrade” building at 591 Camino de la Reina and its three-story parking garage, the four-story “Corinthian Title” building at 5030 Camino de la Siesta, and the five-story Millennium Mission Valley development building at 730 Camino del Rio North.

Four short-term (ten-minute) sound level measurements were conducted during the afternoon of Wednesday, September 13, 2017, to quantify the existing on-site acoustical environment due to vehicle traffic. The measurement results are summarized in Table 5.7-3, *Sound Level Measurements dBA*, and correspond to the locations depicted on Figure 5.7-1, *Sound Level Measurement Locations*. A review of the table shows that the measured sound levels ranged from approximately 63 dBA Leq to 75 dBA Leq. The primary noise source observed during the site visit was vehicular roadway traffic.

Table 5.7-3. Sound Level Measurements (dBA)

	Measurement Location	Date/Time	Leq	Lmin	Lmax	L10	L50	L90	Traffic
ML1	Southeast project property line corner, approximately 60 feet above ground level.	9/13/2017 14:10-14:20	74.8	72.0	78.6	75.8	74.6	73.4	I-8 & ramps: 2,486 cars, 24 medium trucks, 8 heavy trucks, 2 buses, and 14 motorcycles
ML2	Southeast project property line corner, five feet above ground level.	9/13/2017 14:30-14:40	68.7	65.0	74.2	70.4	68.1	66.2	Camino del Rio North: 48 cars and 2 medium trucks
ML3	Northeast corner of 591 Camino de la Reina parking garage, approximately 35 feet above ground level.	9/13/2017 14:55-15:05	66.0	63.3	68.8	67.0	65.8	64.8	Not counted
ML4	North project property line, five feet above ground level.	9/13/2017 15:10-15:20	63.2	56.6	71.5	66.4	61.4	58.5	Camino de la Reina: 138 cars, 1 medium truck, 1 heavy truck, and 1 bus

EXISTING NOISE LEVELS

The geometry of the project site and adjacent roadways is complex and the distance from some roadways to some portions the project site is more than 500 feet. Because of these factors, noise levels on the project site were estimated based on adjustments to measured levels, as detailed in Table 5.7-4, *Existing Noise Levels*.

Table 5.7-4. Existing Noise Levels (dBA CNEL)

	Location/Area	Measured Noise Level	Observed Hourly Equivalent Traffic	Existing Peak-Hour Traffic Volume	Observed-to-Existing Traffic Noise Increase	Existing Noise Level
ML1	South project boundary, upper floors	74.8	15,204	21,000	+1.4	76.2
ML2	South project boundary, first floor	68.7	15,204	21,000	+1.4	70.1
ML3	West project boundary third floor	66.0	N/A	15,300	+1.4*	67.4
ML4	North project boundary, first floor	63.2	846	1,234	+1.6	64.8

*Note because SR 163 traffic was not able to be counted, the I-8 noise increase was assumed to be applicable.

To estimate existing noise levels on the project site, measured noise levels were increased according to the difference between the observed traffic volumes and the peak-hour traffic volumes. A review of Table 5.7-4 shows that existing noise levels at the boundaries of the project site range from approximately 65 dBA CNEL at the north boundary to approximately 76 dBA CNEL at the south boundary.

5.7.3 Impact Analysis**Issue 1**

Would the proposal result or create a significant increase in the existing ambient noise levels which exceed the City's adopted ordinance or thresholds?

Impact Thresholds:

- Exposures of people to noise levels that exceed the City's adopted Noise Ordinance, San Diego Municipal Code, Section 5.9.5.0404 (i.e., 75db(A) Leq).
- Exposure of people to noise levels that exceed the City's adopted Noise Ordinance, San Diego Municipal Code, Section 5.9.5.0401, as identified in Table 5.7-2.
- Exposure of people to transportation noise levels that exceed the sound level limits as presented in Table K-2 of the City's Significance Determination Thresholds and as identified in Table 5.7-5.

Table 5.7-5. Traffic Noise Significance Thresholds (dBA CNEL)

Structure or Proposed Use That Would Be Impacted By Traffic Noise	Interior Space	Exterior Useable Space	General Indication of Potential Significance
Single-family detached	45 dB	65 dB	Structure or outdoor useable area is <50 feet from the center of the closest (outside) lane on a street with existing or future ADTs >7,500
Multi-family, schools, libraries, hospitals, daycare, hotels, motels, parks, convalescent homes	Development Services Department (DSD) ensures 45 dB pursuant to Title 24	65 dB	
Offices, churches, business, professional use	N/A	70 dB	Structure or outdoor useable area is <50 feet from the center of the closest lane on a street with existing or future ADTs >20,000
Commercial, retail, industrial, outdoor spectator sports uses	N/A	75 dB	Structure or outdoor useable area is <50 feet from the center of the closest lane on a street with existing or future ADTs >40,000

Source: City of San Diego 2016

Impact Analysis**PROJECT GENERATED TRAFFIC NOISE**

The highest relative traffic increase generated by the project would be the addition of 310 vehicles to the existing 5,124 vehicles carried by Camino de la Siesta between Camino de la Reina and Camino del Rio North. Vehicular traffic generated by the project would increase the noise level at offsite receptors by less than 0.5 dBA CNEL. Noise level variations of less than 3 dBA are not detectable by the typical human ear. Therefore, the project would not generate noise levels that would result in a significant increase in the existing ambient noise levels.

CONSTRUCTION NOISE

Construction of the project would generate a temporary increase in noise in the project area. The increase in noise level would be primarily experienced close to the noise source. The magnitude of the impact would depend on the type of construction activity, noise level generated by various pieces of construction equipment, duration of the construction phase, and distance between the noise source and receiver.

Construction activity and delivery of construction materials and equipment would be limited to between 7:00 AM and 7:00 PM. The project would implement conventional construction techniques and equipment. Standard equipment such as scrapers, graders, backhoes, rollers, loaders, tractors, cranes, and miscellaneous trucks would be used for construction of most project facilities. Sound levels of typical construction equipment range from approximately 65 dBA to 95 dBA at 50 feet from the source.

Worst-case noise levels are typically associated with grading. Noise sources associated with grading of the project, and associated noise levels are shown in Table 5.7-6, *Grading Noise Source Levels*. Project construction would not require pile driving or on-site rock crushing.

Table 5.7-6. Grading Noise Source Levels

Noise Source	Noise Level	Number
Bulldozer	85 dBA at 50 feet	1
Scraper	85 dBA at 50 feet	1
Backhoe	85 dBA at 50 feet	1
Water Truck	85 dBA at 50 feet	1
Roller	75 dBA at 50 feet	1

The Datakustik Cadna/A industrial noise prediction model was used to estimate noise levels from construction activity on the project site. It was assumed that one bulldozer, one scraper, one backhoe, one water truck, and one roller would operate continuously throughout the site. The equipment would move throughout the site and sometimes could be right next to the property line and sometimes over 300 feet away. Because of this complexity, construction noise was modeled as a large area with the construction equipment moving around within. It was assumed that the construction equipment would operate in the central 50 percent of the site for half of any given day, and that the equipment would be operational for no more than eight total hours per day. No noise reduction related to ground effects, atmospheric absorption, or intervening topography was included in the model.

The closest noise-sensitive land uses are the recently constructed multi-family residences located in the Millennium Mission Valley development, approximately 200 feet east of the centroid of construction activity on the project site. Sound from construction equipment drops by six dBA per doubling of distance. Thus, for the project site, noise levels would be 79 dBA at 100 feet, 73 dBA at 200 feet, etc. Project construction activity could generate up to approximately 73 dBA Leq (12 hours) at residences, which complies with Municipal Code Section 59.5.0404. Construction activity would occur during allowable times and generate sound levels of 75 dBA Leq (12 hours) or less at residential and uses, and thus would be in compliance with Section 59.5.404 of the City of San Diego Municipal Code.

CONSTRUCTION VIBRATION

Construction of the project would involve the use of equipment as described above. Vibration associated with standard (non-vibratory) construction equipment is generally considered to be not perceptible, and therefore negligible, at distances over 50 feet.

In order to mitigate liquefaction-induced settlement, the site may require ground improvement using Vibro-replacement. Vibro-replacement is a deep vibratory compaction technique whereby loose or soft soil is improved for building purposes by means of special depth vibrators. Groundborne vibration would occur as a result of this process. Vibro-replacement could occur as close as 40 feet from an existing structure (the Millennium Mission Valley project on the property adjacent to the east).

An estimate of groundborne vibration levels for this process and soils similar to that found on the project site were provided by Haywood Baker, Inc. Based on these estimates, groundborne vibration could be as high as approximately three millimeters (mm)/sec (0.12 in/sec) PPV at the nearest structure. A vibration level of 0.12 in/sec PPV would be “strongly perceptible” but not “disturbing” to humans within the structure, and would not cause damage to “historic” or newer buildings.

OPERATIONAL (NON-CONSTRUCTION) NOISE

The project is expected to include the following noise sources: heating/ventilation/air conditioning (HVAC) units, truck deliveries, and maintenance activities such as parking lot sweepers and trash collection trucks. The project would not include any trash compactors, refrigeration units, or generators.

A mechanical equipment plan had not been developed at the time of this noise analysis. However, it is a standard practice that residential, commercial, and retail HVAC units would be roof-mounted, behind parapets exceeding equipment heights. No equipment would be ground-mounted. It was assumed that the commercial and retail buildings would each be served by five ten-ton HVAC units each producing a sound power level of approximately 91 dBA. All HVAC units were treated as stationary point sources, five feet in height above rooftop level, and assumed to be constantly operational. It was assumed that each residential and shopkeepers unit would be served by one three-ton HVAC unit producing a sound power level of approximately 76 dBA. All HVAC units were treated as stationary point sources, five feet in height above rooftop level, and assumed to be constantly operational.

Deliveries include trucks approaching and maneuvering into position; moving merchandise within the vehicle; rolling of a dolly on a ramp, sidewalk, or road; and/or a truck-mounted refrigeration unit. These activities produce average noise levels of approximately 75 dBA (10 minutes) at 25 feet, based on measurements conducted by dBA staff. The project would not include a commercial loading area or loading dock. Anticipated deliveries to the commercial and retail spaces would arrive via panel trucks parked temporarily in the drive aisle. The project site would not accept deliveries from tractor-trailers. It was assumed that the project site could receive up to three deliveries per hour.

The DataKustik Cadna/A industrial noise prediction model was used to estimate noise levels from noise sources on the project site. The locations of the project buildings and loading areas were imported from the site plan. The project would produce noise levels less than 52.5 dBA Leq at adjacent residential uses (off-site and on-site) and less than 60 dBA Leq at adjacent commercial land uses, and would comply with City of San Diego Municipal Code noise limits. Refuse vehicles or parking lot sweepers would operate on the project site between 7:00 AM and 7:00 PM.

The highest relative traffic increase generated by the project would be the addition of 310 vehicles to the existing 5,124 vehicles carried by Camino de la Siesta between Camino de la Reina and Camino del Rio North. Vehicular traffic generated by the project would increase the noise level at offsite receptors by less than 0.5 dBA CNEL. Noise level variations of less than 3 dBA are not detectable by the typical human ear. Therefore, the project would not generate noise levels that would result in a significant increase in the existing ambient noise levels.

Significance of Impacts

Construction activity would occur during allowable times and generate sound levels below 75 dBA Leq (12 hours) at residential zones, in compliance with Section 59.5.404 of the City of San Diego Municipal Code. The project would result in no construction noise impact.

The project could generate groundborne construction vibration levels as high as 0.12 in/sec PPV at the closest structures, which are the buildings in the Millennium Mission Valley development on the property adjacent to the east. Project construction vibration could be “strongly perceptible” but not “disturbing” to occupants, and would not damage the structure. Temporary vibration impacts associated with construction would be less than significant.

The project would produce noise levels less than 52.5 dBA Leq at adjacent residential uses (off-site and on-site) and less than 60 dBA Leq at adjacent commercial land uses, and would comply with City of San Diego Municipal Code noise limits. Refuse vehicles or parking lot sweepers would operate on the project site between 7:00 AM and 7:00 PM. The impact of project-generated operational noise would be less than significant.

Mitigation Measures

Mitigation would not be required.



Figure 5.7-1. Sound Level Measurement Locations

5.8 Historical Resources

This section evaluates potential historical resources impacts associated with the project. The following discussion is based on California Historic Resources Information System search and a Potential Historical Resources Review, included as Appendix I.

5.8.1 Existing Conditions

The project site is fully developed. Existing development consists of buildings, parking lots, and associated improvements. The project site does not contain any known cultural resources. However, other developments within the vicinity have discovered historical resources of archaeological significance, most likely due to location near a historical fresh water source, the San Diego River.

BUILT ENVIRONMENT

The founder of modern San Diego was Alonzo Erastus Horton, who arrived in San Diego in 1867. During the 1870s, the telephone, telegraph, and electricity arrived in San Diego and the water supply was improved. Throughout the 1880s, San Diego experienced a massive real estate boom. The city expanded physically as a result of the improvements to the regional highway network in the 1950s.

The first major urban development in Mission Valley was the Mission Valley Shopping Center (now Westfield Mission Valley Mall). Hotel Circle became an important commercial-recreation and visitor-oriented area. The development of the Mission Valley Shopping Center was soon followed with Jack Murphy Stadium (now SDCCU Stadium), which was completed in 1967. Over time, the Mission Valley area has developed with mixed-use and multiple dwelling unit neighborhoods, office complexes, small and large retail centers, and light industrial parks.

The project site is fully developed with buildings, parking lots, and associated improvements. Development of the project site began in 1966.

ARCHAEOLOGY

The prehistory of San Diego County has most frequently been divided chronologically into three or four major periods. An Early Man stage, perhaps dating back tens of thousands of years, has been proposed, but no widely accepted evidence of human occupation of North America dating prior to about 12,000 Before Christ (B.C.) has emerged. More generally accepted divisions include a Terminal Pleistocene/Early Holocene period (ca. 12,000-6000 B.C.), a Middle/Late Holocene period (ca. 6000 B.C.-Anno Domini (A.D.) 800), and a Late Prehistoric period (ca. A.D. 800-1769). For the Terminal Pleistocene/Early Holocene period (ca. 12,000-6000 B.C.), the earliest chronologically distinctive archaeological evidence is the Clovis pattern. Dated elsewhere in North America to around 11,500 B.C., Clovis assemblages are distinguished primarily by large fluted projectile points. At least three isolated fluted points have been reported within San Diego County. The most widely recognized archaeological pattern within this period is termed San Dieguito and has been dated from at least as early as 8500 B.C. to perhaps around 6000 B.C. Archaeological evidence from the Middle/Late Holocene Period (ca. 6000 B.C.-A.D. 800) period in the coastal San Diego region has been characterized as belonging to the Archaic stage, Millingstone horizon, Encinitas tradition, or La Jolla pattern. Distinctive characteristics of the La Jolla pattern include extensive shell middens, portable ground stone metates and manos, crudely flaked cobble tools, occasional large expanding stemmed projectile points (Pinto and Elko forms), and flexed human burials. A Late Prehistoric period (ca. A.D. 800-1769) in coastal San Diego County has been distinguished, primarily on the basis of three major innovations: the use of small projectile points, brownware pottery, and the practice of human cremation. Labels applied to the archaeological manifestations of this period include Yuman, Cuyamaca, Patayan, and Hakataya. Traits

characterizing the Late Prehistoric period include a shift toward greater use of inland rather than coastal settlement locations, greater reliance on acorns as an abundant but labor-expensive food resource, a greater emphasis on hunting of both large and small game, a greater amount of interregional exchange, more elaboration of nonutilitarian culture, and possibly denser regional populations.

In ethnohistoric times, central and southern San Diego County was occupied by speakers of a Yuman language or languages, variously referred to as Kumeyaay, Diegueño, Tipai, and Ipai. Kumeyaay territory extended from south of Agua Hedionda Lagoon, Escondido, and Lake Henshaw to south of Ensenada in northern Baja California, and east nearly as far as the lower Colorado River. The Kumeyaay inhabited a diverse environment that included littoral, valley, foothill, mountain, and desert resource zones. A large number of village sites have been identified throughout San Diego County. The diet of the Kumeyaay included both plant and animal foods, and groups residing near Mission Valley could have utilized several ecological niches varying by altitude.

The San Diego River was a major source of fresh water in the San Diego Metropolitan Area, which has attracted people to the valley since prehistoric times. The valley has also been used for its sand and gravel extraction in the early 1950s and has played a key role in local and regional transportation since prehistoric times.

5.8.2 Regulatory Framework

As described in the City of San Diego's *California Environmental Quality Act Significance Determination Thresholds* (2016), Federal, State, and local criteria have been established for the determination of historical resource significance. The criteria for determining a resource's significance generally focus on a resource's integrity and uniqueness, its relationship to similar resources, and its potential to contribute important information to scholarly research. Some resources that do not meet Federal significance criteria may be considered significant under State or local criteria.

Federal

National Historic Preservation Act of 1966 and National Register of Historic Places. The National Historic Preservation Act of 1966 established the National Register of Historic Places (NRHP) as the official Federal list of cultural resources that have been nominated by State offices for their significance at the local, State, or Federal level. Listing on the NRHP provides recognition that a property is historically significant to the nation, the state, or the community. Properties listed (or potentially eligible for listing) on the NRHP must meet certain significance criteria and possess integrity of form, location, or setting. Barring exceptional circumstances, resources generally must be at least 50 years old to be considered for listing on the NRHP.

Criteria for listing on the NRHP are stated in Title 36, Part 60 of the Code of Federal Regulations (36 CFR 60). A resource may qualify for listing if there is quality of significance in American history, architecture, archaeology, engineering, and culture present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association; and where such resources:

- Are associated with events that have made a significant contribution to the broad patterns of history.
- Are associated with the lives of persons significant in the past.
- Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.

- Have yielded, or may be likely to yield, information important in prehistory or history.

Eligible properties must meet at least one of the NRHP 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 historic 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 State CEQA Guidelines (Section 15064.5), as well.

State

California Environmental Quality Act. For the purposes of CEQA, a significant historic resource is one that qualifies for the California Register of Historic Resources (CRHR) or is listed in a local historic register or deemed significant in an historical resources survey, as provided under Section 5024.1(g) of the Public Resources Code. A resource that is not listed in or is not determined to be eligible for listing in the CRHR, is not included in a local register or historic resources, or is not deemed significant in an historical resources survey may nonetheless be deemed significant by a CEQA lead agency.

As indicated above, the California criteria (State CEQA Guidelines Section 15064.5) for the registration of significant architectural, archaeological, and historical resources on the CRHR are nearly identical to those for the NRHP. Furthermore, CEQA Section 21083.2(g) defines the criteria for determining the significance of archaeological resources. These criteria include definitions for a “unique” resource, based on its:

- Containing information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- Having a special and particular quality such as being the oldest or best available example of its type.
- Being directly associated with a scientifically recognized important prehistoric or historic event or person.

Public Resources Code Section 5020 et seq. Properties listed, or formally designated eligible for listing, on the NRHP are automatically listed on the CRHR, as are State Historical Landmarks and Points of Interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

Public Resources Code Section 5097 et seq. State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and designates the Native American Heritage Commission (NAHC) to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to a year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR.

Local

Historical Resources Register. As compared to CEQA, the City provides a broader set of criteria for eligibility for the City’s Historical Resources Register. As stated in the City’s Historical Resources Guidelines, any improvement, building, structure, sign, interior element and fixture, feature, site, place, district, area, or object may be designated as historic by the City of San Diego Historical Resources Board if it meets any of the following criteria:

- 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;
- Is identified with persons or events significant in local, State, or national history;
- 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;
- Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman;
- Is listed or has been determined eligible by National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the State Historic Preservation Office (SHPO) for listing on the State Register of Historical Resources; or
- 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.

City of San Diego Municipal Code: Historical Resources Regulations and Historical Resources Guidelines. The City's Historical Resources Regulations (SDMC 143.0201 *et seq.*), determine the procedures for processing proposed development plans, among other things, if designated historical resources are present on a site. If a substantial alteration to a site's historic resource is proposed, mitigation must be provided in accordance with the Historical Resources Guidelines.

The City's Historical Resources Guidelines serve to implement the Historical Resources Regulations in compliance with applicable local, State, and Federal policies and mandates. When avoidance of a significant resource is not possible, the City's Guidelines require preparation and implementation of a research design and data recovery program. The guidelines are intended to maintain consistency in the identification, evaluation, preservation/mitigation, and development (i.e., management) of the City's historical resources.

5.8.3 Impact Analysis

Thresholds of Significance

Federal, State, and local criteria have been established for the determination of historical resource significance. These criteria are used by the City of San Diego to determine significance under CEQA, as provided below.

NATIONAL REGISTER OF HISTORIC PLACES

The National Register criteria, contained in National Register Bulletin 16 (U.S. Department of the Interior 1986:1), state that:

The quality of significance in American history, architecture, archaeology, engineering, and culture is 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; or
- B. That are associated with the lives of persons significant in our past; or

- 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; or
- D. That has yielded, or may be likely to yield, information important in prehistory or history.

Criteria Considerations Exceptions: Ordinarily cemeteries, birthplaces, or graves of historical figures; properties owned by religious institutions or used for religious purposes; structures that have been moved from their original locations; reconstructed historic buildings; properties primarily commemorative in nature; and properties that have achieved significance within the past 50 years will not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- B. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- C. A birthplace or grave of a historical figure of outstanding importance, if there is no other appropriate site or building directly associated with his or her productive life; or
- D. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- F. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- G. A property achieving significance within the past 50 years, if it is of exceptional importance.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

For the purposes of CEQA, a significant historic resource is one which qualifies for the California Register of Historical Resources or is listed in a local historic register or deemed significant in a historical resource survey, as provided under Section 5024.1(g) of the Public Resources Code. A resource that is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historic resources, or not deemed significant in a historical resource survey may nonetheless be historically significant for purposes of CEQA.

CITY OF SAN DIEGO GENERAL PLAN

Significance criteria as outlined in the General Plan reflect a broad definition of historical, architectural, and cultural importance; a perspective of local, rather than state or national significance; and the belief that all aspects of history are potentially of equal importance.

CITY OF SAN DIEGO HISTORICAL RESOURCES REGISTER

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 Resources 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 National Register of Historic Places or is listed or has been determined eligible by the California Office of Historic Preservation (OHP) for listing on the State Register of Historical Resources; or
- F. Is a finite group of resources related to one another in a clearly distinguishable way; or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest, or aesthetic value; or which represent one or more architectural periods or styles in the history and development of the City.

According to the City's Significance Determination Thresholds, if a resource is not listed in, or determined eligible for listing in, the California Register, is not included in a local register, or is not deemed significant in a historical resource survey, it may nonetheless be historically significant. The significance of a historical resource is based on the potential for the resource to meet one or more of the criteria presented above, including the potential to address important research questions as documented in a site-specific technical report prepared as part of the environmental review process. Research priorities for the prehistoric, ethnohistoric, and historic periods of San Diego history are discussed in Appendix A (San Diego History) to the City's *Historical Resources Guidelines* and should be used in the determination of historical significance. As a baseline, the City of San Diego has established the following criteria to be used in the determination of significance under CEQA.

An archaeological site must consist of at least three associated artifacts/ecofacts (within a 40-square-meter area) or a single feature. Archaeological sites containing only a surface component are generally considered not significant, unless demonstrated otherwise. (Testing is required to document the absence of subsurface deposit.) Such site types may include isolated finds, bedrock milling stations, sparse lithic scatters, and shellfish processing stations. All other archaeological sites are considered potentially significant. The determination of significance is based on a number of factors specific to a particular site, including site size, type, and integrity; presence or absence of a subsurface deposit, soil stratigraphy, features, diagnostics, and datable material; artifact and ecofact density; assemblage complexity; cultural affiliation; association with an important person or event; and ethnic importance. The determination of significance for historic buildings, structures, objects, and landscapes is based on age, location, context, association with an important person or event, uniqueness, and integrity. A site will be considered to possess ethnic significance if it is 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.

NON-SIGNIFICANT RESOURCE TYPES

Isolates consist of less than three artifacts/ecofacts within a 40-square-meter area. Sparse Lithic Scatters are identified and evaluated based on criteria from the OHPS California Archaeological Resource Identification and Data Acquisition Program; Sparse Lithic Scatters (February 1988). Isolated Bedrock Milling Stations are defined as having no associated site within a 40-meter radius and lacking a subsurface component. Shellfish Processing Sites are defined as containing a minimal amount of lithics (i.e. less than five or six) and no subsurface deposit. Historic

buildings, structures, objects, and landscapes are generally not significant if they are less than 45 years old. A non-significant building or structure located within a historic district is by definition not significant. Resources found to be non-significant as the result of a survey and assessment will require no further work beyond documentation of the resources (including site records) and inclusion in the survey and assessment report.

Issue 1

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

Impact Thresholds:

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

- A resource listed in, eligible, or potentially eligible for listing in the NRHP.
- A resource listing in, eligible, or determined to be eligible, by the State Historical Resources Commission, for listing in the CRHR (PRC Section 5024.1).
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC, or identified as significant in an historical resource resources survey meeting the requirements of Section 5024.1(g) of the PRC.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the CRHR (PRC Section 5024.1).
- An archaeological site consisting of at least three associated artifacts/ecofacts (within a 40-square-meter area) or a single feature.
- A "traditional cultural property." A site would be considered to possess ethnic significance if it is associated with a burial or cemetery; religious, social, or transitional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the belief system of a discrete ethnic population.

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

Impact Analysis**BUILT ENVIRONMENT**

Criteria for listing on the NRHP are included above and stated in Title 36, Part 60 of the Code of Federal Regulations (36 CFR 60). Buildings on the project site include automobile sales offices and a service center. These buildings are not associated with events that have made a significant contribution to broad patterns of history or with the lives of persons significant in the past. The buildings on-site do not embody distinctive characteristics of a

type, period, or method of construction, as they are of a type and method of construction consistent with automobile dealerships both of the period when constructed and currently. The buildings do not represent the work of a master, do not possess high artistic value, and do not represent a significant and distinguishable entity whose components lack individual distinction. Additionally, as concluded below, the site is not likely to yield information important in prehistory or history, although mitigation has been identified in the event previously unknown subsurface cultural resources are encountered during site grading. Therefore, the site is not considered a Federal historical resource.

As indicated above, the California criteria (State CEQA Guidelines Section 15064.5) for the registration of significant architectural, archaeological, and historical resources on the CRHR are nearly identical to those for the NRHP. Furthermore, CEQA Section 21083.2(g) defines the criteria for determining the significance of archaeological resources, described below under Archaeology. The site is not considered a State historical resource.

The City of San Diego criteria for determination of historic significance, pursuant to the CEQA, is evaluated based upon age (over 45 years), location, context, association with an important event, uniqueness, or structural integrity of the building. In addition, projects requiring the demolition of structures that are 45 years or older are also reviewed for historic significance in compliance with CEQA. CEQA Section 21084.1 states “a project that may cause a substantial adverse change in the significance of a historical resource is a project that may cause a significant effect on the environment.”

Development of the property, including original structures, began in 1966. Therefore, existing buildings could be more than 45 years old. The project would involve the demolition of the existing structures on the site. In accordance with San Diego Municipal Code Section 143.0212, City Historical Resources staff conducted a Potential Historic Resources Review of the property on May 29, 2015. The materials for the Potential Historic Resources Review included a commercial building record search, historic photograph search (which yielded photographs that contained the project site from 1977, 1984, 1985, and 1988), photographic survey, and a site plan for evaluation. A list of alterations to the existing buildings was also included, which documents the addition of a service bay in 1969; the addition of an office, as well as conference room and lounge in 1977; and installation of air conditioning in 1980. The list of occupants on the site has been some form of Townsend automotive since 1968.

Based on information contained in the Potential Historical Resources Review conducted for the project (see Appendix I), City Historical Resources staff determined that the property does not meet local designation criteria as an individually significant resource under any adopted Historical Resources Board Criteria. Therefore, no potentially significant structures are present on the property and the project would not adversely affect an historic resource.

ARCHAEOLOGY

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

15064.5(b)(1). Any historical resource listed in or eligible to be listed in the California Register of Historical Resources, including archaeological resources, is considered to be historically or culturally significant.

Many areas of San Diego County, including mesas and the coast, are known for intense and diverse prehistoric occupation and important archaeological and historical resources. The region has been inhabited by various cultural groups spanning 10,000 years or more.

According to the City of San Diego reference materials, the project site is located within an area having a high sensitivity level for archaeological resources according to the City's Historical Resources Sensitivity Maps. Furthermore, given the alluvial setting, it is possible that any cultural material related to human habitation may have been buried by the alluvial cover and therefore there may be buried historical resources without visible surface elements. Therefore, there is the potential for ground-disturbing activities to result in impacts to unknown historical resources (archaeology).

MM 5.8-1 The project would result in direct impacts to unknown subsurface archaeological resources as a result of project grading.

Significance of Impacts

Built Environment

The property does not meet local criteria as an individually significant resource under the adopted Historic Resources Board Criteria. Therefore, no potentially significant structures are present on the property. No impact would result.

Archaeology

Given the alluvial setting, there is a potential for buried cultural resources that may not be visible on the surface. Therefore, impacts to historical resources would be potentially significant.

Mitigation Measures

MM 5.8-1

ARCHAEOLOGICAL RESOURCES

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 (1/4 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 ¼ 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 OSHA safety requirements may necessitate modification of the AME.

2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and 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 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 also 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 (Sec. 5097.98) and State Health and Safety Code (Sec. 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 Reinternment 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.

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 8AM of the next business day.
 - b. Discoveries

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

- c. Potentially Significant Discoveries
If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV-Discovery of Human Remains shall be followed.
- d. The PI shall immediately contact MMC, or by 8AM 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.

Implementation of this monitoring program will ensure that development of the Witt Mission Valley project would mitigate direct project impacts to cultural resources to below a level of significance.

Significance of Impacts following Implementation of Mitigation Measures

With implementation of mitigation measure 5.8-1, impacts to historical resources would be reduced to below a level of significance.

Issue 2

Would the proposal result in any impact to existing religious or sacred uses within the potential impact area?

Impact Thresholds:

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

Impact Analysis

The project site is developed with buildings associated with commercial auto sales and service. The project site does not contain any existing or religious sacred uses.

Significance of Impacts

No existing religious or sacred uses are located on the project site or within the immediate project vicinity. As a result, no impacts to religious or sacred uses would occur.

Mitigation Measures

Mitigation would not be required.

Issue 3

Would the proposal result in the disturbance of any human remains, including those interred outside formal cemeteries?

Impact Threshold:

- Discovery of human remains shall always be treated as a significant discovery.

Impact Analysis

Although the project site has been graded, new development would involve grading that could disturb unknown human remains that are at a subsurface level.

Significance of Impacts

The project would involve grading that could potentially unearth previous unknown human remains. Therefore, impacts would be significant.

Mitigation Measures

Implementation of MM 5.8-1 would be required.

Significance of Impacts following Implementation of Mitigation Measures

Implementation of MM5.8-1 would mitigate impacts associated with encountering human remains to below a level of significance.

5.9 Tribal Cultural Resources

This section evaluates potential Tribal Cultural Resources associated with the project. The analysis is based in part on the California Historic Resources Information System (CHRIS) digital database search and consultation with California Native American tribes traditionally and culturally affiliated with the project area who have requested consultation pursuant to PRC Section 21080.31.

5.9.1 Existing Conditions

PHYSICAL CONDITIONS

As described previously, the project site is developed with a car dealership, associated maintenance and storage buildings, and surface parking. The project site is generally flat and has minimal ornamental landscaping. The site is located approximately 430 feet south of the San Diego River at its closest point. The San Diego River has historical significance for Native American Tribes. The project site is separated from the San Diego River by Camino de la Reina and existing multi-family housing.

ETHNOGRAPHIC, RELIGIOUS, AND CULTURAL CONTEXT

Many areas of San Diego County, including mesas and the coast, are known for intense and diverse prehistoric occupation and important archaeological and historical resources. The prehistory of San Diego County has most frequently been divided chronologically into three or four major periods. An Early Man stage, perhaps dating back tens of thousands of years, has been proposed, but no widely accepted evidence of human occupation of North America dating prior to about 12,000 Before Christ (B.C.) has emerged. More generally accepted divisions include a Terminal Pleistocene/Early Holocene period (ca. 12,000-6000 B.C.), a Middle/Late Holocene period (ca. 6000 B.C.-Anno Domini (A.D.) 800), and a Late Prehistoric period (ca. A.D. 800-1769).

For the Terminal Pleistocene/Early Holocene period (ca. 12,000-6000 B.C.), the earliest chronologically distinctive archaeological evidence is the Clovis pattern. Dated elsewhere in North America to around 11,500 B.C., Clovis assemblages are distinguished primarily by large fluted projectile points. At least three isolated fluted points have been reported within San Diego County. The most widely recognized archaeological pattern within this period is termed San Dieguito and has been dated from at least as early as 8500 B.C. to perhaps around 6000 B.C.

Archaeological evidence from the Middle/Late Holocene Period (ca. 6000 B.C.-A.D. 800) period in the coastal San Diego region has been characterized as belonging to the Archaic stage, Millingstone horizon, Encinitas tradition, or La Jolla pattern. Distinctive characteristics of the La Jolla pattern include extensive shell middens, portable ground stone metates and manos, crudely flaked cobble tools, occasional large expanding stemmed projectile points (Pinto and Elko forms), and flexed human burials.

A Late Prehistoric period (ca. A.D. 800-1769) in coastal San Diego County has been distinguished, primarily on the basis of three major innovations: the use of small projectile points, brownware pottery, and the practice of human cremation. Labels applied to the archaeological manifestations of this period include Yuman, Cuyamaca, Patayan, and Hakataya. Traits characterizing the Late Prehistoric period include a shift toward greater use of inland rather than coastal settlement locations, greater reliance on acorns as an abundant but labor-expensive food resource, a greater emphasis on hunting of both large and small game, a greater amount of interregional exchange, more elaboration of nonutilitarian culture, and possibly denser regional populations.

In ethnohistoric times, central and southern San Diego County was occupied by speakers of a Yuman language or languages, variously referred to as Kumeyaay, Diegueño, Tipai, and Ipai. Kumeyaay territory extended from south of Agua Hedionda Lagoon, Escondido, and Lake Henshaw to south of Ensenada in northern Baja California, and east nearly as far as the lower Colorado River. The Kumeyaay inhabited a diverse environment that included littoral, valley, foothill, mountain, and desert resource zones. A large number of village sites have been identified throughout San Diego County. The diet of the Kumeyaay included both plant and animal foods, and groups residing near Mission Valley could have utilized several ecological niches varying by altitude.

5.9.2 Regulatory Framework

FEDERAL

United States Code, Title 25, Section 3100 et seq. The Native American Graves Protection and Repatriation Act is a Federal law passed in 1990 that provides a process for museums and Federal agencies to return certain Native American cultural items, such as human remains, funerary objects, sacred objects, or objects of cultural patrimony, to lineal descendants and culturally-affiliated Indian tribes.

STATE

California Health and Safety Code, Section 7050.5. This code requires that if human remains are discovered in the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

California Public Resources Code, Sections 5020-5029.5. This code continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The commission oversees the administration of the California Register of Historical Resources and is responsible for the designation of State Historical landmarks and Historical Points of Interest.

California Public Resources Code, Section 5024.1. The CRHR is the State version of the NRHP program. The CRHR was enacted in 1992 and became official January 1, 1993. The CRHR was established to serve as an authoritative guide to the State's significant historical and archaeological resources. Resources that may be eligible for listing include buildings, sites, structures, objects, and historic districts. CEQA identifies a historic resource as a property that is listed on – or eligible for listing on – the NRHP, CRHR, or local registers. NRHP-listed properties are automatically included on the CRHR.

The CRHR also includes properties that: have been formally determined eligible for listing or are listed in the NRHP; are registered State Historical Landmark Number 770 and above; are points of historical interest that have been reviewed and recommended to the State Historical Resources Commission for listing; or are City- or County-designated landmarks or districts (if criteria for designation are determined by OHP to be consistent with CRHR criteria).

Assembly Bill 52. Assembly Bill 52 (AB 52), the Native American Historic Resource Protection Act, sets forth a proactive approach intended to reduce the potential for delay and conflicts between Native American and development interests. Projects subject to AB 52 are those 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 tribal cultural resources (TCR) to the specific cultural resources protected under CEQA. Under AB 52, a TCR is defined as a site, feature, place, cultural landscape (must be geographically defined in terms of size and scope), sacred place, or object with cultural value to a California Native American tribe that is either included or eligible for inclusion in the 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 TCR. AB 52 also mandates lead agencies to consult with tribes, if requested by the tribe, and sets the principles for conducting and concluding consultation.

5.9.3 Impact Analysis

Issue 1

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

- a) Listed of 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.*

Impact Threshold:

The City of San Diego has not yet prepared thresholds of significance for potential impacts to Tribal Cultural Resources. Therefore, for purposes of this EIR, guidance provided by issue questions listed in CEQA Appendix G are utilized to evaluate the potential for significant impacts to Tribal Cultural Resources:

- Listed of 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
- 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.

Impact Analysis

AB 52 requires meaningful consultation with California Native American tribes on potential impacts to TCRs, as defined in Public Resources Code 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 of listed in the California Register of Historic Resources or local register of historical resources.

The project area is located within an area identified as sensitive on the City of San Diego Historical Resources Sensitivity Maps; furthermore, there are recorded cultural resources within a one-mile buffer of the site. Therefore, qualified City staff conducted a records search of the CHRIS digital database; although the search identified no previously recorded resources located within the project boundaries, the search confirmed several previously recorded historic and prehistoric sites in the project vicinity.

The project site has not been selected as a site recommended for historic designation. Furthermore, the project site is not identified on any of the historic resource lists/databases – the National Register of Historic Place and the California State Historical Landmarks, Points of Historical Interest, and Register of Historic Places. Although the City as the lead agency has not identified TCR within the APE, the area is considered sensitive for potential TCR (buried cultural resources and/or subsurface deposits). Therefore, a potential to impact a resource could occur through implementation due to the anticipated grading activities and excavation depths.

In accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego provided formal notification to requesting consultation of the Iipay Nation of Santa Isabel and the Jamul Indian Village, both traditionally and culturally affiliated with the project area via electronic mail on October 31, 2017. Both Native American tribes responded within the 30-day formal notification period requesting consultation. Consultation took place on November 13, 2017. Both Native American tribes concurred with the City's determination that potential impacts could result to TCRs. On November 13, 2017, the consultation process was concluded by both the Iipay Nation of Santa Isabel and Jamul Indian Village. As previously identified, although TCR have not been identified within the project site, the area is considered sensitive for potential TCR (in the form of archaeological resources). Therefore, there is a potential for impacts to occur.

Significance of Impacts

The project site has not been selected as a site recommended for historic designation. Furthermore, the project site is not identified on any of the historic resource lists/databases – the National Register of Historic Place and the California State Historical Landmarks, Points of Historical Interest, and Register of Historic Places.

The project area is located within an area identified as sensitive on the City of San Diego Historical Resources Sensitivity Maps. In addition, the Iipay Nation of Santa Isabel and the Jamul Indian Village tribes are affiliated traditionally and culturally with the project area. The area is considered sensitive for potential TCR (in the form of archaeological resources). Therefore, there is the potential for inadvertent discovery of a resource that could be impacted by project implementation. Impacts would be considered significant.

Mitigation Measures

Impacts to TCRs would be reduced to below a level of significance with implementation of mitigation measures outlined under Historical Resources (Archaeology).

Significance of Impacts Following Implementation of Mitigation Measures

Impacts to TCRs, with implementation of mitigation measure MM 5.8-1, would be reduced to below a level of significance.

5.10 Health and Safety

This section evaluates the potential for hazardous materials affecting public health and safety within the project site. The analysis is based on the evaluation provided in the *Phase I Environmental Site Assessment* prepared by Hillmann Consulting (June 9, 2017) and the *Limited Phase II Subsurface Investigation Report* prepared by Hillmann Consulting (November 8, 2017), included as Appendix J and Appendix K, respectively. Additionally, Envirofacts and GeoTracker searches were undertaken to determine potential sources of hazardous emissions and/or toxic soils on the project site and in the project area (September 2017; Appendix L).

5.10.1 Existing Conditions

The Witt Mission Valley project site is characterized by an existing automotive dealership sales and office, service bays, exterior auto sales areas, and associated surface parking and landscaping. The primary source of air quality degradation on-site comes from vehicle trips to the office buildings, as well as occasional heavy trucks for deliveries.

5.10.2 Regulatory Framework

Numerous Federal, State, and local laws and regulations regarding hazardous materials have been developed with the intent of protecting public health, the environment, surface water, and groundwater resources. Over the years, the laws and regulation have evolved to deal with different aspects of the handling, treatment, storage, and disposal of hazardous substances. Relevant laws and regulations are discussed below.

Federal Regulations

The Federal Resource Conservation and Recovery Act of 1976 established the authority of the EPA to develop regulations to track and control hazardous substances from their production, through their use, to their disposal. The EPA also administers the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, also known as “Superfund,” and the Superfund Amendments and Reauthorization Act (SARA) of 1986 (amended CERCLA, SARA Title III). CERCLA, SARA Title III provide a Federal framework for setting priorities for cleanup of hazardous substances released to air, water and land. This framework provides for the regulation of the cleanup process, cost recovery, response planning, and communication standards and set the precedent for states and local authorities to do the same. Applicable regulatory agencies have kept records on hazardous materials storage, use, and disposal, and make these lists publically available. Locally, these include the San Diego County Environmental Assessment Listing and the State Department of Toxic Substance Control List.

In regards to worker safety, Federal Occupational Safety and Health Administration (OSHA) along with the California OSHA define and enforce worker safety standards and require proper handling and disposal of hazardous materials according to OSHA and EPA regulations. These regulations ensure that safety standards and potential risks, for example to asbestos or lead exposure, are considered and remediated in accordance with the National Emissions Standards for Hazardous Air Pollutants, OSHA, and other applicable State and Local regulations.

State Regulations

Obnoxious uses are regulated under Section 41700 of the State Health and Safety Code, under the “Nuisance Rule.” For the project site, this would be enforced by the County Department of Environmental Health. The regulation states that “a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the

public or which cause or have a natural tendency to cause injury or damage to business or property.” The number of people in the area that are affected is not limited to a specific distance from the source of the nuisance, as long as it can be proven that the business is the true source. In other words, there is no direct distance relationship between an obnoxious source and its impact on a sensitive receptor.

Hazardous materials regulation is discussed under Section 25532(g) of the State Health and Safety Code. The regulation states that facilities that store, handle, or use regulated substances as defined in the California Health and Safety Code Section 25532(g) in excess of threshold quantities shall prepare a risk management plan for determination of risk to the community. As identified in the California Health and Safety Code, Section 25532(g), the term, “regulated substances” is defined as any substance that is comprised of the following:

1. A regulated substance that is listed in Section 68.130 of Title 40 of the Code of Federal Regulations pursuant to paragraph (3) of subsection (r) of Section 112 of the Clean Air Act (42 U.S.C. Sec. 7412(r)(3)).
2. An extremely hazardous substance listed in Appendix A of Part 355 of Subchapter J of Chapter I of Title 40 of the Code of Federal Regulations that is any of the following:
 - a. A gas at standard temperature and pressure
 - b. A liquid with a vapor pressure at standard temperature and pressure equal to or greater than ten millimeters mercury
 - c. A solid that is (a) in solution or in molten form, (b) in powder form with a particle size less than 100 microns, or (c) reactive with a National Fire Protection Association rating of 2, 3, or 4.
3. On or before June 30, 1997, the office shall, in consultation with the Office of Environmental Health Hazard Assessment, determine which of the extremely hazardous substances listed in Appendix A of Part 355 of Subchapter J of Chapter I of Title 40 of the Code of Federal Regulations do either of the following:
 - a. May pose a regulated substances accident risk, with consideration of the factors specified in subdivision (g) of Section 25543.1, and should remain on the list of regulated substances until completion of the review conducted pursuant to subdivision (a) of Section 25543.3.
 - b. The office shall adopt, by regulation, a list of the extremely hazardous substances identified pursuant to clause (i). Extremely hazardous substances placed on the list are regulated substances for the purpose of this article.

Facilities which handle, store, or use any quantity of toxic or highly toxic gas as defined by the most recent Uniform Fire Code (UFC), which are also regulated substances as defined in the California Health and Safety Code Section 25532(g), shall prepare an off-site consequence analysis (OCA). This analysis shall be performed in accordance with Title 19 of the California Code of Regulations Section 2750.2 and Section 2750.3. If the OCA demonstrates that toxic release could potentially impact the residential community, the facility will not store, handle, or use the material in those quantities. If a decrease in quantity of material reduces the distance to toxic endpoint to where the community is not impacted, the facility shall be able to utilize the material in that specified quantity.

Facilities that handle, store, or use any quantity of toxic or highly toxic gas need to prepare an OCA. According to Section 2750.2, the OCA parameters consist of assessing toxic endpoints stated in Section 2770.5, Table 1 and Table 3, which include, but are not limited to the following hazardous materials: Acrolein, Acrylonitrile, Ammonia, Arsine, Boron-Tetrachloride, Boron-Tetrafluoride, Bromine, Carbon-Disulfide, Chlorine, Chloroform, Diborane, Fluorine, Formaldehyde, Furan, Hydrazine, Hydrochloric Acid, Hydrogen-Chlorine, Methyl-Chlorine, Methyl-Hydrazine, Nickel-Carbonyl, Nitric-Acid, Nitric Oxide, Oleum, Phosphine, Phosphorus, Piperidine, Sulfur-Dioxide, Sulfur-Tetrafluoride, and Vinyl Acetate. Regulated flammable substances are stated in Table 2 of Section 2770.5, and include, but are not limited to the following flammable materials: Butane, 1-Butene, 2-Butene, Carbon

Oxysulfide, Chlorine Monoxide, Cyanogen, Cyclopropane, Ethane, Hydrogen, Methane, Propane, Silane, Tetramethylsilane, Vinyl Acetate, and Vinyl Fluoride. Flammable endpoints vary according to the following issues: (a) explosion, (b) radiant heat/exposure time, (c) lower flammability limit, (d) wind/speed/atmospheric stability class, (e) ambient temperature/humidity, (f) height of release, (g) surface roughness, (h) dense or neutrally buoyant gases, and (h) temperature of released substances.

Section 2750.3 of the California Code of Regulations identifies the worst-case release scenario analysis. Based on the consequences of hypothetical toxic and hazardous release, worst-case scenarios comprise toxic gas release, toxic liquids, and flammables. Worst-case scenarios regarding toxic gases include temperature conditions and the potential source of the toxic gases as well as release rates. Worst-case scenarios pertaining to toxic liquids involve temperature, liquid source, area of potential contamination, and release rate. Worst-case scenarios pertaining to flammable materials include vaporization, determination of distance to endpoints as stated in Section 2750.2, potential passive mitigation, pressure and temperature as well as potential source of flammable material.

Local Regulations

County Department of Environmental Health. The County Department of Environmental Health (DEH), Hazardous Materials Management Division (HMMD) administers the above State program and issues Unified Facility Program Permits to regulate businesses that may impact public health and safety. These include businesses that use hazardous materials, dispose of hazardous wastes, have underground storage tanks, and/or generate medical waste. The goal of the HMMD is to protect human health and the environment by ensuring hazardous materials, hazardous waste, medical waste, and underground storage tanks are properly managed. This is determined on a project specific basis.

All applications for businesses which use, handle, or store hazardous materials, including hazardous waste, must be reviewed by DEH, HMMD. The purpose of this review is to determine if a Hazardous Materials Business Plan or a Risk Management and Prevention Plan (RMPP) is required to be submitted or updated by the business, and if a DEH permit is required. If a business meets any of the following, a Hazardous Materials Business Plan will be required to be completed prior to final occupancy:

1. The quantity of hazardous materials at any one time is equal to or greater than a total weight of 500 pounds, or a total volume of 55 gallons, or 200 cubic feet at standard temperature and pressure for a compressed gas; or
2. The quantity of any Acutely Hazardous Material (AHM) will be equal or greater than its Threshold Planning Quantity (TPQ); or
3. Any amount of the material is a carcinogen, reproductive toxin, a hazardous gas with a Threshold Limit Value-Time Weighted Average (TLV-TWA) or Threshold Limit Value-Short Term Exposure Limit (TLV-STEL) of 110 ppm or less.

In addition, if the business handles any quantity of an AHM, the business must submit an AHM Registration Form to the Department of Environmental Health prior to issuance of the construction permit. If the business will use or store any AHMs in excess of specified quantities (TPQs), the DEH is required to conduct a site-specific computer screening prior to issuance of the construction permit. The purpose of this screening is to determine if an off-site consequence would likely result from the sudden release of the Acutely Hazardous Materials. If the probability of a release exists, the business must prepare a Risk Management and Prevention Plan.

San Diego Air Pollution Control District. Per the California Air Toxics “Hot Spots” Information and Assessment Act (AB 2588), toxic air emissions in the region are regulated by the San Diego Air Pollution Control District (SDAPCD). A toxic air contaminant is defined as an “air pollutant that may increase a person’s risk of developing cancer and/or other serious health effects.” Approximately 800 chemical compounds have been identified as having potential adverse health effects.

Hazardous air polluters in San Diego include the following types of businesses: chromium electroplating and anodizing; dry cleaning; aerospace manufacturing and rework facilities; shipbuilding and repair operations; halogenated solvent cleaning; ethylene oxide sterilizing; and miscellaneous organic chemicals process. Other types of businesses are considered hazardous air polluters; however, they are not expected to be major contributors in San Diego. These include: gasoline distribution (bulk terminals), wood furniture manufacturing, boat manufacturing, printing and publishing, research and development facilities, and off-site waste and recovery operations.

The SDAPCD requires a review of businesses which may emit air contaminants from non-vehicular sources. The purpose of this review is to determine whether an Authority to Construct and Permit to Operate are required for certain equipment at the business. In addition, the review will determine whether notification is required for demolition and renovation projects involving asbestos. Permits and notifications help San Diego County protect the public health by attaining and maintaining ambient air quality standards and preventing public nuisance.

There are no set initial limitations or prohibited types of business in relation to closeness to sensitive receptors; however, during the permitting process some issues may arise that would need to be addressed or changed in order for standards to be met, though these are on a case specific basis. The only exception to this rule is, should the business dealing with hazardous materials be in the vicinity of a school (K-12), it must be a minimum distance of 1,000 feet away from the school. Notification of such use to the parents of each child in the school is also required.

City of San Diego. At the local level, the San Diego Fire Department screens inventories of substances and inspects sites. All businesses applying for a permit which use, handle, or store any quantity of hazardous materials shall be reviewed by the San Diego Fire Department through the completion and submittal of the Fire Department’s Hazardous Materials Information form. The purpose of this review is to classify the building occupancy in accordance with the California Building Code.

Emergency Response/Evacuation. The San Diego Emergency Plan was adopted by the City Council in June 1974 subsequent to the City Council enacting the Emergency Services Ordinance in February of 1974. The plan provides for the effective mobilization of all the resources of San Diego, both public and private, to meet any condition constituting a local emergency and provide for the organization, powers and duties, services, and staff of the emergency organization. The purpose of the plan is to:

- Provide a basis for the conduct and coordination and the management of critical resources during emergencies.
- Establish a mutual understanding of the authority, responsibilities, functions, and operations of civil government in San Diego during an emergency.
- Provide a basis for incorporating emergency organization into those non-governmental agencies and organizations having resources necessary to meet foreseeable emergency requirements.

During peacetime and wartime emergencies, the emergency plan sets forth operational concepts and schedules, and assigns tasks and responsibilities to each of the units of the emergency organization. The plan takes effect if:

- A state of war emergency exists.
- The governor has proclaimed a state of emergency in an area including San Diego.
- The mayor or the director of emergency services orders, provided that the existence or threatened existence of a local emergency has been proclaimed in accordance with the provisions of the Emergency Services Ordinance.

The Office of Emergency Services coordinates the overall county response to disasters and is responsible for alerting and notifying appropriate agencies when disaster strikes, coordinating all agencies that respond, ensuring resources are available and mobilized in times of disaster, developing plans and procedures for response to and recovery from disasters, and developing and providing preparedness materials for the public.

5.10.3 Impact Analysis

Issue 1

Would the proposal expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Impact Threshold:

- A project that is located in a brush fire hazard area, hillside, or an area with inadequate fire hydrant services or street access.

Impact Analysis

The proposed project is located in an area that would not result in the exposure of people or structures to significant risk due to wildland fire. The project site is located within a fully-developed portion of the City, with multi-lane freeway on one side and roadways on all other sides. Located within an urban area, there is little fuel available for fire; vegetation along the San Diego River Channel does not provide high-risk fuel, due to its generally riparian nature.

Significance of Impacts

Impacts due to wildland fire would be less than significant. No mitigation measures are required.

Mitigation Measures

Mitigation would not be required.

Issue 2

Would the proposal result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?

Impact Threshold:

- Projects which propose the handling, storage and treatment of hazardous materials, e.g., a Hazardous Waste Facility, falling under Municipal Code Section 141.1001 Hazardous Waste Research Facilities and Section 141.1002.

Impact Analysis

There are no existing or proposed schools within a quarter-mile of the project site. Furthermore, the project proposes the construction of a mixed-use development comprised of residential (including shopkeepers units), commercial retail, and commercial office uses with associated parking (surface and structured). Commercial uses could include offices or restaurant uses. As such, there would be no hazardous emissions or handling of hazardous materials.

As noted in the Phase I investigation, asbestos was suspected in existing buildings on the project site. These buildings are to be demolished, potentially exposing construction workers and others to asbestos. Building demolition would follow regulatory guidelines and laws in place, as well as state-of-the-industry practices, to protect workers and others involved in construction of the project. Health risks would be minimized to the extent possible.

The construction of the project would require the transport, temporary storage, and use of asphalt fuels, paints, and solvents which could potentially be released and result in exposure to these chemicals. The use and handling of materials associated with the construction of the project would follow all applicable Federal, State, and local regulations, including California OSHA, Caltrans, and Department of Health, Hazardous Materials Division. The project would comply with all applicable State and local regulations for hazardous materials and waste management during project construction.

Significance of Impacts

The project is not within a quarter-mile of an existing or proposed school. Therefore, there is no impact to sensitive receptors at schools. Additionally, industry standards in place would insure no risk to workers by hazardous materials during demolition and construction.

Mitigation Measures

Mitigation would not be required.

Issue 3

Would the proposal impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Impact Threshold:

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Impact Analysis

The project would be designed in accordance with applicable safety standards, including the preparation of a site-specific emergency evacuation plan. Proposed buildings would be constructed with fire-resistant construction materials and would include a protective system of sprinklers.

Primary access to the project site would be from a new driveway off Camino de la Siesta. The project would share a fire lane constructed for the adjacent Millennium Mission Valley project through a Shared Access Agreement. This fire lane would provide adequate site access for fire service.

Primary evacuation routes consist of the major interstates, highways, and prime arterials within the City. A San Diego Emergency Plan, including an Evacuation Annex, is in place to provide for the effective mobilization of all the resources of San Diego. The project would not impair implementation of, or physically interfere with, the San Diego Emergency Plan. Additionally, the project is subject to review by the San Diego Fire Department and the San Diego Police Department to ensure compliance with applicable safety standards.

Significance of Impacts

The project would be designed in accordance with applicable safety standards. The project would not impair implementation of, or physically interfere with, emergency response plans or emergency evacuation plans.

Mitigation Measures

Mitigation would not be required.

Issue 4

Would the proposal be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment?

Impact Thresholds:

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- Located on or near known contamination sources.
- Located within 1,000 feet of a known contamination site.
- Located within 2,000 feet of a known —border zone property (also known as a “Superfund” site) or a hazardous waste property subject to corrective action pursuant to the Health and Safety Code.
- DEH site file closed.
- Located in Centre City San Diego, Barrio Logan, or other areas known or suspected to contain contamination sites.
- Located on or near an active or former landfill.
- A site that has been historically developed with industrial or commercial uses which involved dewatering (the removal of groundwater during excavation), in conjunction with major excavation in an area with high groundwater (such as downtown).

Impact Analysis

An Envirofacts search was conducted for the project site (Appendix L) and yielded the project site in its current use, Witt Lincoln, in the search results. Witt Lincoln is listed as a small quantity generator for hazardous waste generator. The GeoTracker search conducted for the project (Appendix L) yielded two closed leaking underground storage tank cases on the project site. However, the results of these searches do not result in a significant impact. It is assumed that Witt Lincoln is permitted and regulated as a small quantity generator for hazardous waste generator. In addition, this use would no longer exist as the project, a mixed-use development, would not generate hazardous waste.

A Phase I Environmental Site Assessment (ESA) was conducted for the project site by Hillmann Consulting (June 9, 2017) (Appendix J). The Phase I concluded that there are four Recognized Environmental Conditions (RECs) and one Historical Recognized Environmental Conditions (HRECs) associated with the project site. The project site has

operated as an auto repair facility since approximately 1970. There is the potential for undocumented releases of hazardous materials or petroleum products during this time, which constitutes an REC.

Three 2,000-gallon underground storage tanks (USTs) used for regular unleaded gasoline and one 550-gallon tank used for waste oil were located at the project site. One 2,000-gallon tank was replaced with a double walled tank in 1986, and contamination of the soil was noted. All contaminated soil was excavated and properly disposed of in a landfill. The waste oil UST was removed in 1991, during which contamination of the soil was noted in the remote piping area. All contaminated soil was excavated and properly disposed of in a landfill. All three 2,000 gallon USTs were removed sometime during the early 2000s. Tank closure documentation was provided for one of the tanks, located on the northern side of the main showroom building; additional closure documentation was provided for a second tank; however, no final closure letter was issued. No documentation was provided to Hillmann from the property owner or the County of San Diego for the last tank removal. Hillmann was unable to ascertain the approximate location of two of the tanks based off of the maps provided by the San Diego DEH. There is still the potential for soil contamination in the vicinity of the tanks. Therefore, the USTs constitute a REC.

Approximately seventeen hydraulic lifts were noted at the project site at the time of the site visit for the Phase I ESA. Because of the age of these hydraulic lifts, there is the potential for an undocumented released and subsequent contamination of the area from hydraulic fluids and/or polychlorinated biphenyls (PCBs). This constitutes a REC.

Significant staining was noted in the area around the waste oil above ground storage tank (AST), which indicates that spilling or an undocumented release may have occurred at the location. This constitutes a REC.

Two leaking underground storage tank (LUST) cases were noted on the project site. For the waste oil UST and one of the regular unleaded gasoline USTs. In both cases. According to the San Diego County DEH, all contaminated soil was excavated and removed. However, contaminated groundwater remains at the site. This constitutes a HREC.

Additionally, a preliminary visual screening observed suspected asbestos containing materials (ACM) in the roofing materials, plaster walls, drywall, ceiling tiles, cover base, adhesive, and stucco. It is possible that additional quantities of ACM may exist in enclosed areas or areas not accessed during the assessment.

Considering the dates of construction of the existing buildings, lead based paint may also be present at the project site. A lead based paint survey was conducted and detected lead paint in the tiles in the interior of the showroom, two doors within the showroom, and the upstairs of the warehouse. In general, interior painted surfaces on the project site were in fair condition.

Site development that involves demolition of structures must adhere to regulations in place that ensure adequate treatment and disposal of hazardous materials, as well as appropriate protection of workers to avoid potential health risks. Demolition of the existing buildings and improvements and disposal of any hazardous materials would be conducted in accordance with state and local regulations. The Asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP), as specified under Rule 40, CFR 61, Subpart M, applies to asbestos removal and demolitions and is enforced locally by the San Diego Air Pollution Control District, under authority, per Regulation XI, Subpart M Rules 361.145 and 361.150. No health risks will occur. Prior to demolition, both friable and various nonfriable ACMs, if present, would be removed from the structures per NESHAPS, Title 40 Code of Federal Regulations Part 61. In addition, all applicable laws and regulations would be followed, including provisions

requiring notification of tenants, employees, maintenance and custodial personnel, and outside contractors, of the location of these materials, if present.

A *Limited Phase II Subsurface Investigation Report* was prepared for the project by Hillmann Consulting (November 8, 2017; Appendix K). The Phase II investigation featured soil and soil gas sampling to identify potential contamination from petroleum hydrocarbons, lead, PCBs, and VOCs. Results from the soil sampling indicated two soil samples had detectable levels of petroleum hydrocarbons with a maximum of 180 milligram per kilogram (mg/Kg) diesel range hydrocarbons. The results from the lead analysis indicated some samples had low, background levels of lead with a maximum of 8.58 mg/Kg. No PCBs were detected in the soil. Concentrations of hydrocarbon detected at the site are insignificant for the proposed use. The lead concentrations are below the Department of Toxic Substances (DTSC) Screening Level for residential applications of 80 mg/Kg. Results from the soil gas sampling indicated toluene was detected in four soil gas samples with a maximum of 0.85 microgram per liter (ug/L). No other VOC was detected in any of the soil gas samples. The detected concentrations were compared to the DTSC Future Construction Residential Screening Levels, which are derived from current indoor air quality standards and published default structure attenuation values for future residential construction. Results indicated none of the samples had toluene or PCB concentrations greater than these conservative screening guidelines.

The results of the Phase II Investigation suggest no significant subsurface impacts in any of the 22 areas selected for subsurface investigation at the site. However, during grading of the site, there is a possibility that isolated areas would have actionable levels of petroleum compounds due to the historic natures of business activities. If encountered, elevated petroleum concentrations in the underlying solid should be separated out and properly addressed during the grading process. The soil and soil gas sampling found that no significant levels of hydrocarbons, PCBs, or VOCs are present in the soil in the project site. This finding closes out the four RECs and one HREC found by the Phase I investigation.

Significance of Impacts

Because the above-mentioned State and County agencies oversee asbestos and lead-based paint removal, and the applicant is required to notify these agencies prior to any demolition activities as per State and County law, human health and public safety impacts due to the demolition of the on-site structures would be less than significant.

As disclosed in the Phase I EAS, the project site is the location of former soil contamination, in the form of four identified RECs and one identified HREC. As disclosed in the Phase II EAS, these prior contaminations have been resolved and no longer represent a risk to future occupants of the site. The project would be conditioned to implement the SMP to ensure management and disposal of unknown contaminated soil that may be encountered during project grading. Impacts would be less than significant.

Furthermore, due to the nature of the project, the routine transport, use, or disposal of hazardous materials on or through the subject site is not anticipated. Although minimal amounts of such substances may be present during construction, they are not anticipated to create a significant public hazard. Additionally, the project would be required to comply with all Federal, State, and local requirements associated with hazardous materials; therefore, impacts would be less than significant and no mitigation is required.

Mitigation Measures

Mitigation would not be required.

Issue 5

Would the proposal expose people to toxic substances, such as pesticides and herbicides, some of which have long-lasting ability, applied to the soil during previous agricultural uses?

Impact Threshold:

- Located on a site presently or previously used for agricultural purposes.

Impact Analysis

An Aerial Photo Decade Package Report was obtained from Environmental Data Resources, Inc. as part of the research for the Phase I ESA. Photographs from 1949, 1953, 1964, and 1966 show the project site as agricultural land. The photograph from 1970 shows the project site as developed with the car sales lot, parking lot, and several buildings.

While the project appears to have been the site of previous agriculture uses, since 1968, the project site has been developed. Therefore, no risk of exposure to toxic substances such as pesticides and herbicides would result.

Significance of Impacts

Former agricultural uses on the project site were minimal and ceased over 50 years ago. Therefore, no impact would result.

Mitigation Measures

Mitigation would not be required.

Issue 6

Would the proposal result in a safety hazard for people residing or working in a designated airport influence area?

Issue 7

Would the proposal result in a safety hazard for people residing or working within two miles of a private airstrip or a private airport or helicopter facility that is not covered by an adopted Airport Land Use Compatibility Plan?

Impact Thresholds:

- Project sites that meet one or more of the following criteria may result in a significant impact.
- Projects located in a designated airport influence area and where the Federal Aviation Administration (FAA) has reached a determination of "hazard" through FAA Form 7460- 1, "Notice of Proposed Construction or Alteration" as required by FAA regulations in the Code of Federal Regulations (CFR) Title 14 §77.13 or inconsistent with an Airport's Land Use Compatibility Plan (ALUCP) could be a significant impact.

Impact Analysis

The project site is not located within two miles of a private airstrip or private airport or helicopter facility not covered by an adopted ALUCP. The project site is located within AIAs of San Diego International Airport and Montgomery Field. The AIA is "the area in which current or future airport related noise, overflight, safety, or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses." To facilitate implementation and reduce unnecessary referrals of projects to the ALUC, the AIA is divided into Review Area 1 and Review Area 2. The project site is located within Review Area 2 of both AIAs (see Figure 2-8, *Montgomery Field*

ALUCP Airport Influence Area, and Figure 2-9, *San Diego International Airport ALUCP Airport Influence Area*). The composition of each area is determined as follows:

- Review Area 1 consists of locations where noise and/or safety concerns may necessitate limitations on the types of land uses. Specifically, Review Area 1 encompasses locations exposed to noise levels of 60 dB CNEL or greater together with all of the safety zones depicted on the associated maps in this chapter. Within Review Area 1, certain types of land use actions, including rezones and plan amendments, are to be submitted to the ALUC for review and consistency determination with the ALUCP.
- Review Area 2 consists of locations beyond Review Area 1 but within the airspace protection and/or overflight areas depicted on the associated maps in the ALUCP. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2. The additional function of this area is to define where various mechanisms to alert prospective property owners about the nearby airport are appropriate. Within Review Area 2, only land use actions for which the height of objects is an issue are subject to ALUC review.

The ALUCP contains four principal compatibility concerns: noise (exposure to aircraft noise), safety (land use factors that affect safety both for people on the ground and occupants of aircraft), airspace protection (protection of airport airspace), and overflight (annoyance or other general concerns related to aircraft overflights). The project site is located within the Overflight Notification Area of the San Diego International Airport, as shown in Figure 5.10-1, *San Diego International Airport Compatibility Policy Map: Overflight*. An Overflight Notification is a buyer awareness tool that ensures prospective buyers of residential land use development near an airport are informed about the airport's potential impact on the property. The project does not propose for-sale residential land uses; therefore, this notification area is not applicable. As shown in Figure 5-10-2, *San Diego International Airport Airspace Protection Boundary*, the project site is located within the Airspace Protection Boundary for the San Diego International Airport, but outside of the FAA Part 77 certification of non-obstruction area. The project site is located outside of the noise contours and safety zones for San Diego International Airport.

The project site is located within the FAA Height Notification Boundary of Montgomery Field Airport, as shown in Figure 5.10-3, *Montgomery Field ALUCP: Part 77 Airspace Protection*. The Part 77 Height Notification Boundary extends 20,000 feet from the nearest point of any runway. Within the boundary, Part 77, Subpart B requires that the FAA be notified of any proposed construction of alteration having a height greater than an imaginary surface extending 100 feet outward and one foot upward (slope of 100 to one) from the runway elevation. The project site is more than five miles from Montgomery Field and within Mission Valley, which sits below the mesa where Montgomery Field is located. Tallest structures would be 65 feet in height. The project would not result in obstruction to airport operations from Montgomery Field.

Significance of Impacts

Although the project site is within the AIAs of San Diego International Airport and Montgomery Field, the project would not result in impacts associated with the four compatibility concern areas. As a result, impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

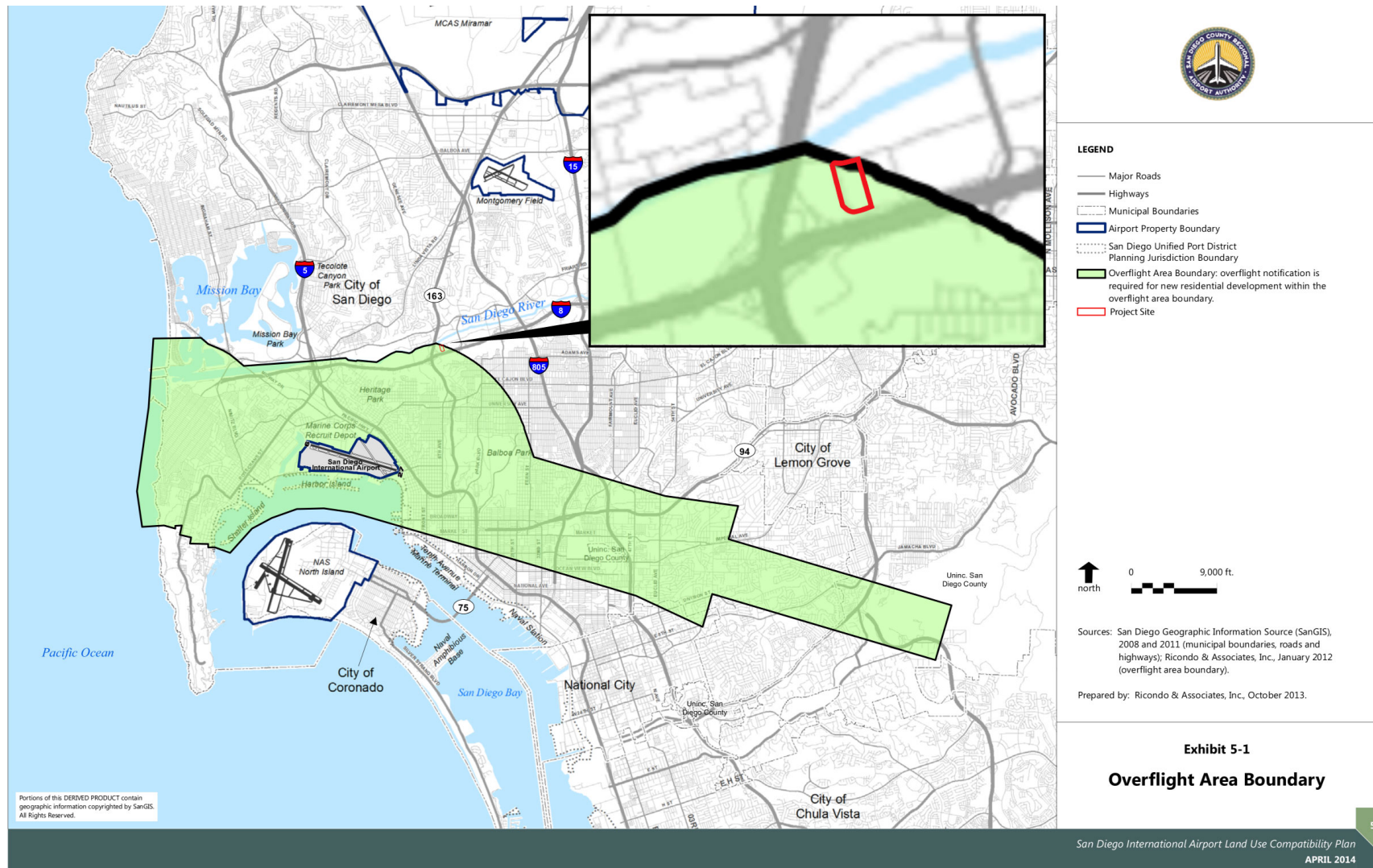


Figure 5.10-1. San Diego International Airport Compatibility Policy Map: Overflight

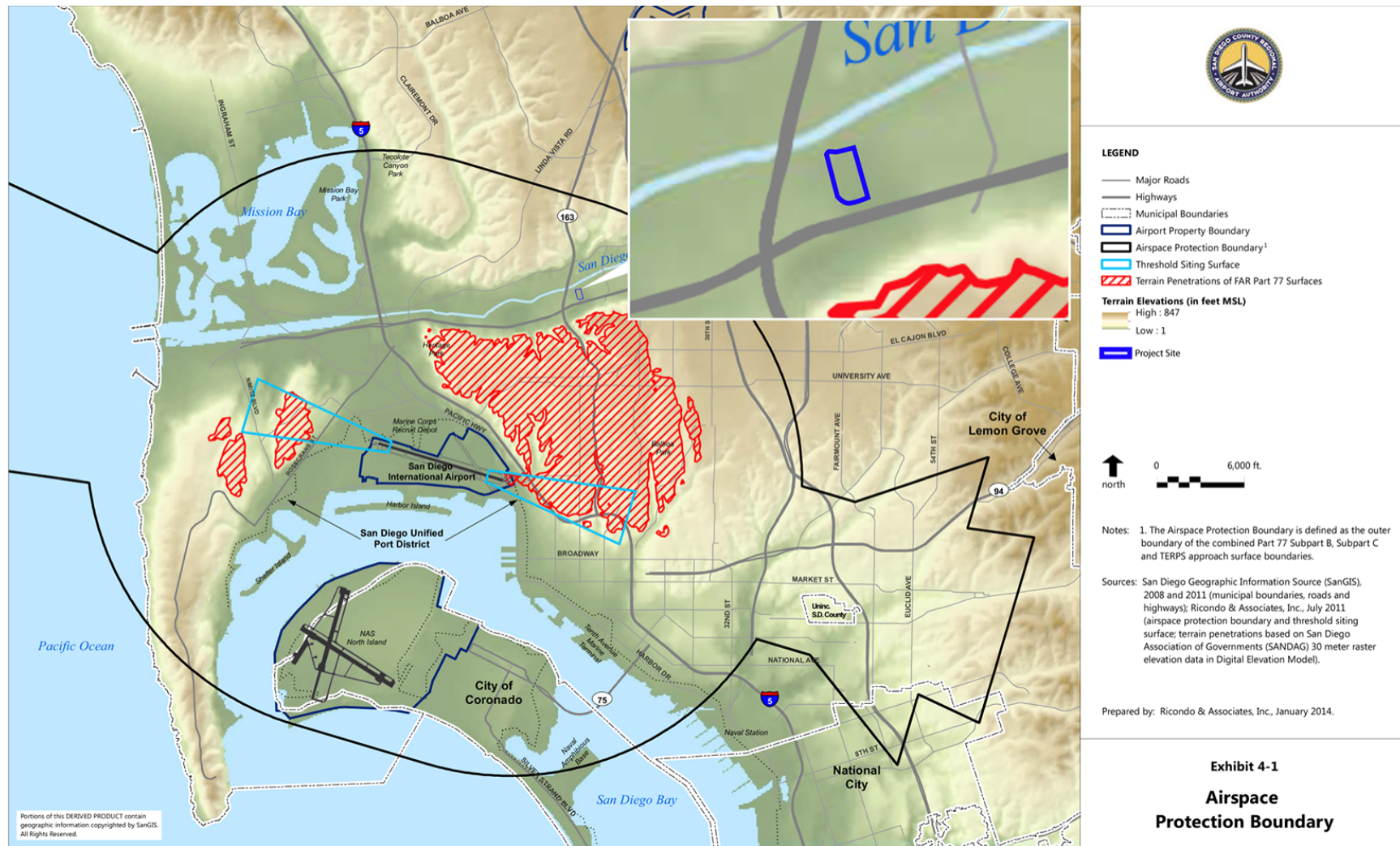
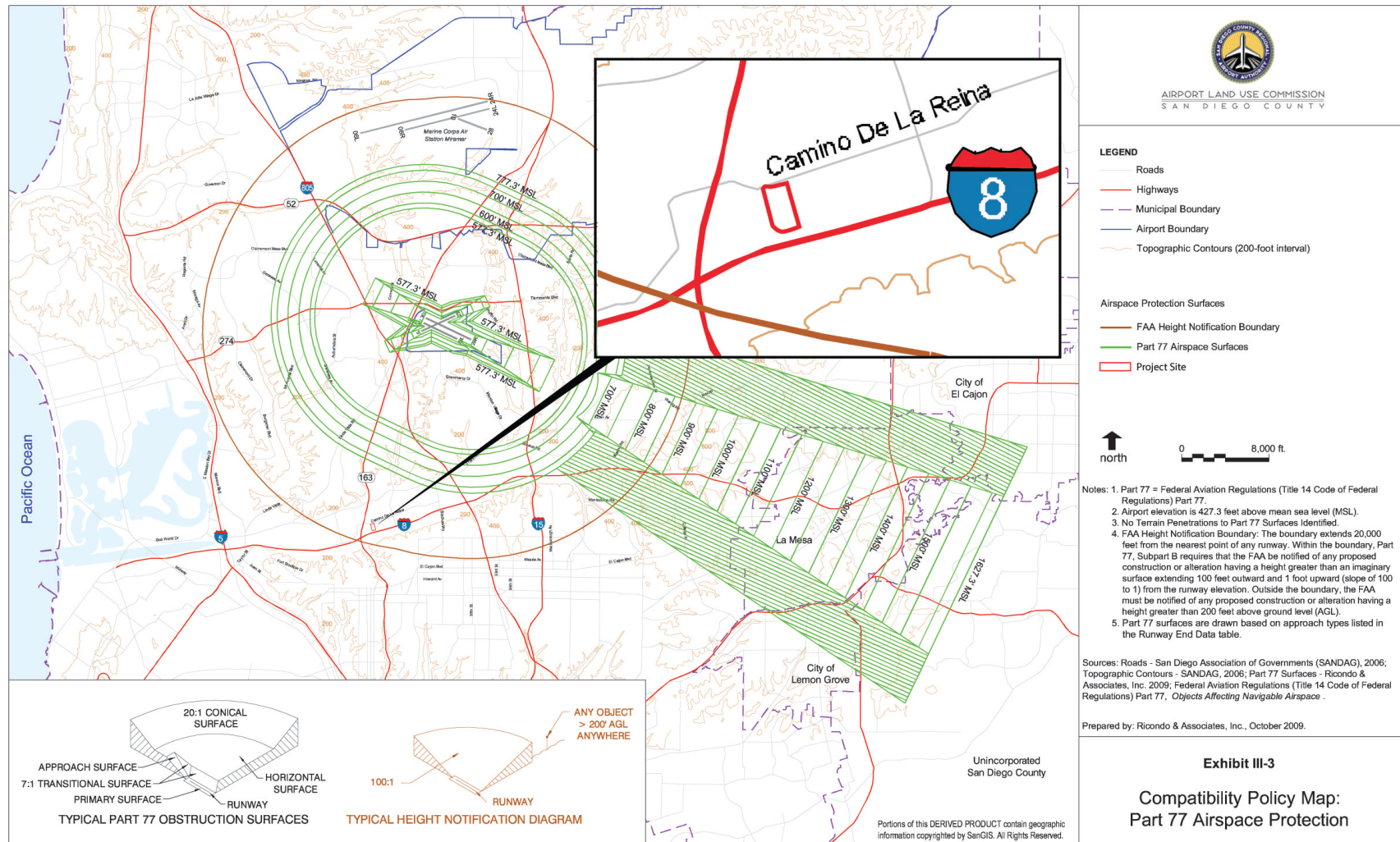


Figure 5.10-2. San Diego International Airport Airspace Protection Boundary



Montgomery Field Airport Land Use Compatibility Plan
January 25, 2010

Figure 5.10-3. Montgomery Field Airport Compatibility Policy Map: Part 77 Airspace Protection

5.11 Public Services and Facilities

Public services and facilities are those functions that serve development on a community-wide basis. These functions include police, fire and emergency response services, parks and recreation, schools, and libraries. The following discussion is based on correspondence with service providers (see Appendix F) and evaluates the potential impacts the project would have upon existing services. Figure 5.11-1, *Location of Public Services*, shows the location of the public services and facilities that serve the project site.

5.11.1 Existing Conditions

POLICE PROTECTION

Police protection for the project is provided by the San Diego Police Department (SDPD). The SDPD is divided into nine divisions. The project site is serviced by the Eastern Division. The project is located on beat 315.

The Eastern Division, located at 9225 Aero Drive, serves the communities and neighborhoods of Allied Gardens, Birdland, College East, College West, Del Cerro, Grantville, Kearny Mesa, Lake Murray, Mission Valley East, Qualcomm, San Carlos, Serra Mesa, and Tierrasanta. The Eastern Division serves a population of 155,892 people and encompasses 47.1 square miles. This police station is located approximately six miles northeast of the project site. The Eastern Division is currently staffed with 83 sworn patrol personnel and 68 civilian employees. Officers work ten-hour shifts. Staffing is comprised of three shifts, which operate from 6:00 AM to 4:00 PM (First Watch), 2:00 PM to Midnight (Second Watch), and from 9:00 PM to 7:00 AM (Third Watch). Using the Department's recommended staffing guidelines, Eastern Division currently deploys a minimum of nine patrol officers on First Watch, 11 patrol officers on Second Watch, and eight patrol officers on Third Watch.

The San Diego Police Department does not staff individual stations based on ratios of sworn officers per 1,000 population. The goal Citywide is to maintain 1.48 officers per 1,000 population. The Department is currently staffing 1.34 sworn officers per 1,000 residents based on 2014 estimated Citywide resident population of 1,311,882. There are no current plans for additional police sub-stations in the project area. Correspondence with SDPD (Appendix F) notes that police response times in the Mission Valley community will continue to increase with build-out community plans and the increase of traffic generated by new growth.

The Department currently utilizes a five-level priority call dispatch system, which includes priority E (Emergency), one, two, three, and four. The calls are prioritized by the phone dispatcher and routed to the radio operator for dispatch to the field units. The priority system is designed as a guide, allowing the phone dispatcher and the radio dispatcher discretion to raise or lower the call priority as necessary based on the information received. Priority E and priority one calls involve serious crimes in progress or those with a potential for injury. Priority two calls include vandalism, disturbances, and property crimes. Priority three includes calls after a crime has been committed such as cold burglaries and loud music. Priority four calls include parking complaints or lost and found reports.

Table 5.11-1, *Eastern Division Call Priority Response Times*, lists the Department's response-time guidelines, the 2016 Citywide average response times for each priority call level, and the 2016 average response times for each priority level call within Beat 315. As indicated in Table 5.11-1, average response times for Beat 315 exceed the Department goals for all call priorities. The Department strives to maintain the response time goals identified in Table 5.11-1 as one of various other measures used to assess the level of service to the community.

Table 5.11-1. Eastern Division Call Priority Response Times

Call Priority	Department Goal Response Times	2016 Citywide Average Response Times	2016 Beat 315 Average Response Times
Priority E- Imminent threat to life	Within 7 minutes	7 minutes	7.8 minutes
Priority 1- Serious crimes in progress	Within 14 minutes	16 minutes	16.9 minutes
Priority 2- Less serious crimes with no threat to life	Within 27 minutes	42 minutes	44.8 minutes
Priority 3 –Reported after a crime has been committed	Within 80 minutes	100 minutes	112.0 minutes
Priority 4- Parking complaints and lost and found report	Within 90 minutes	151 minutes	152.2 minutes

Source: SDPD, December 7, 2017.

FIRE/LIFE SAFETY PROTECTION

Fire protection and emergency services are provided by the San Diego Fire-Rescue Department (SDFD), which serves a total area of approximately 331 square miles, a population over 1.39 million, and 17 miles of coastline extending three miles offshore. SDFD is a multi-faceted organization that provides the City with fire and life-saving services including fire protection, emergency medical services, and lifeguard protection at San Diego beaches.

Mission Valley is within the service area of the Fire-Rescue Department. Two fire stations serve the project site. Station Number 45, located at 9366 Friars Road, approximately 3.7 miles east of the project site, and Station Number 5, located at 3902 Ninth Avenue, approximately 2.1 miles south of the project site. Station 45 is equipped with a Battalion Chief's vehicle, fire engine, aerial truck, and HAZMAT unit. Fire Station 45 serves the existing project site and would continue to be the primary station servicing the project site. Station 5 serves Hillcrest and its surrounding areas. This station includes a fire engine and a battalion chief's vehicle and has no paramedic unit.

SCHOOLS

Public school service would be provided by San Diego Unified School District (SDUSD). There are no public schools located within Mission Valley. The schools that would serve the project area are located in the adjacent communities of Serra Mesa and Kearny Mesa. Specifically, public schools serving the project area are Jones Elementary School, located in the Serra Mesa community at 2751 Greyling Drive; Taft Middle School, located in the Serra Mesa community at 9191 Gramercy Drive; and Kearny High Complex, located in the Kearny Mesa community at 7651 Wellington Way. There are three charter schools located in the project area: Audeo Charter School, located at 7510-7610 Hazard Center Drive in the Mission Valley community; Dehesa Charter School, located at 4646 Mission Gorge Place in the Navajo community; and San Diego Cooperative Charter School, located at 7260 Linda Vista Road in the Linda Vista community.

LIBRARY

Library services are provided by the San Diego Public Library (SDPL). Mission Valley is served by the Mission Valley Branch of the SDPL, located at 2123 Fenton Parkway, approximately three miles east of the project site. The Mission Valley Branch library is a 19,760-square-foot facility that opened in 2002 and serves an estimated population of 14,698 (as of 2010). The library includes a large community meeting room, seminar rooms, a children's library, an outdoor patio with a children's garden that has a flowing river sculpture, a computer lab, and a mezzanine and terrace. Additionally, two other SDPL branches are located close to the project site: the Mission

Hills Library, located at 925 W. Washington Street, approximately 2.5 miles from the project, and the University Heights Library, located at 4193 Park Boulevard, approximately three miles from the project.

PARKS OR OTHER RECREATIONAL FACILITIES

Mission Valley contains two public recreational amenities, Sefton Field, which houses four little league fields and is located approximately three miles west of the project site, south of Friars Road and a public park located within the Civita development, approximately 1.5 miles northeast of the project site. In addition, the San Diego River Park Master Plan area is located north of the project site along the San Diego River. Included as part of the San Diego River Park Master Plan is an integrated and connected trail system, which provides additional opportunities for access to and recreation along the San Diego River.

Several regional recreational amenities are located near the Mission Valley community. These include Balboa Park, Presidio Park, and Mission Bay Park. Balboa Park, located just north of downtown San Diego, approximately three miles south of the project site, encompasses more than 1,000 acres and includes open space areas, natural vegetation zones, green belts, gardens, walking paths, three off-leash dog parks, restrooms, and recreational facilities, such as tennis courts, swimming pool, lawn bowling, a golf course, and disc golf. In addition, Balboa Park contains 15 museums, several theaters, gift shops, restaurants, and the San Diego Zoo. Presidio Park is located three miles west of the project site, in the Uptown community, and contains open lawn for picnicking and play, as well as restrooms and Junípero Serra Museum. Mission Bay Park, located five miles west of the project site, is the largest aquatic park of its kind in the country, consisting of over 4,600 acres in roughly equal parts land and water. Mission Bay has 27 miles of shoreline, 19 of which are sandy beaches with eight locations designated as official swimming areas. Mission Bay Park offers boat docks and launching facilities, sailboat and motor boat rentals, bicycle and walking paths, basketball courts, and playgrounds, as well as open lawn areas for picnicking and recreation. Public restrooms and showers are available and lifeguard stations are located in designated areas.

5.11.2 Impact Analysis

Issue 1

Would the proposal have an effect upon, or result in a need for new or altered governmental services in any of the following areas: Police protection; Fire/Life Safety protection; Libraries; Parks or other recreational facilities; maintenance of public facilities, including roads; and Schools?

Impact Thresholds:

- Result in the need for new or expanded public facilities, including fire protection, police protection, health, social services, emergency medical, libraries, schools, and parks;
- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- Include recreational facilities or require the construction or expansion of recreation facilities, which might have an adverse physical effect on the environment.

Impact Analysis

POLICE

The project site is located within the Eastern Division of the SDPD. The project would introduce 463 residents at the site, based on the proposed 277 units, SANDAG's current vacancy rate for multi-family residential units in the

Mission Valley community (6.3 percent), and a density factor of 1.85 persons per household. New residents would likely already reside locally or regionally and would already be included in the projected City population figures in the area. Although the project could result in an increase in service calls, 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. Furthermore, development impact fees would be paid prior to building permit issuance, which would be used to maintain, as well as fund, future facilities. Therefore, no new or expanded facilities would be required as a result of the project and impacts relative to Police Services would not be significant.

FIRE RESCUE

In June 2011, the City adopted the recommendations of the Fire Service Standards of Response Coverage Deployment Study for the City of San Diego Fire-Rescue Department Report, also known as the Citygate Report. Noted in the Citygate Report, a future fire station is planned for the west side of Mission Valley to cover gaps in response to this overall area. The Mission Valley West–Fast Response Station will serve the communities of Linda Vista, Mission Valley, and Old Town with funding to be split among these three communities through the City’s Mission Valley Public Facilities Financing Plan (PFFP). For fire operations to the site, the effectiveness of San Diego Fire-Rescue is directly correlated to speed and weight of response. Speed being measured in response time; weight is measured in personnel/equipment. Response times greater than seven minutes and 30 seconds place the public at risk of exponential fire growth or death if breathing has halted.

Based on the Citygate Report, the City adopted the performance measure that first due-units to treat medical patients and control small fires should arrive within 7.5 minutes 90 percent of the time from the receipt of the 911 call in fire dispatch. This equates to a one-minute dispatch time, 1.5-minute company turnout time, and five-minute drive time in the most populated areas. To confine fires near the room of origin, stop wildland fires to under three acres when noticed promptly, and treat up to five medical patients at once, a multiple unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911 call receipt in fire dispatch 90 percent of the time. This equates to a one-minute dispatch time, 1.5-minute company turnout time, and eight-minute drive time spacing for multiple units in the most populated areas.

The project would result in approximately 463 residents at the site (based on the proposed 277 units, SANDAG’s current vacancy rate for multi-family residential units in the Mission Valley community (6.3 percent), and a density factor of 1.85 persons per household), which would increase the demand for fire protection within the service area. The project would be constructed in accordance with applicable fire codes and would comply with applicable City regulations. The project would provide fire safety features, such as installation of fire sprinklers. The project would not conflict with the Mission Valley Community Plan in terms of number, size, and location of existing or planned Fire-Rescue facilities. The Fire-Rescue Department has facilities and staffing in the project area to adequately serve the project. Although the project could result in an increase in service calls, no new or expanded facilities or improvements to existing facilities would be required as a result of the project. Furthermore, development impact fees, which would be used to maintain as well as fund future facilities, would be paid prior to building permit issuance. Therefore, no new or expanded facilities would be required as a result of the project, and impacts to Fire Protection would not be significant.

SCHOOLS

Public school service within the project area is provided by SDUSD. There are no public schools located within Mission Valley. SDUSD also offers a host of magnet, alternative, charter, and special education programs that

would be available to serve residents of the project. There are no identified deficiencies at these schools and SDUSD currently does not have plans for new or expanded school facilities that would serve the project site.

School	Address	Estimated Capacity ¹	2016-17 Enrollment	2017-18 Projected Enrollment
Jones Elementary	2751 Greyling Drive San Diego, CA 92123	450	312	311
Taft Middle	9191 Gramercy Drive San Diego, CA 92123	625	507	484
Kearny High Complex	7651 Wellington Street San Diego, Ca 92111	1,719	1,480	1,539

Footnote: ¹ Capacities are approximate and are calculated using current class size ratios; if class size ratios change, additional or less capacity may be available. Attendance boundaries are reviewed annually and are subject to change.

Jones Elementary has nine portable and 14 permanent classrooms. Taft Middle has two portable and 25 permanent classrooms. Kearny High Complex has eight portable and 64 permanent classrooms.

Student generation rates vary based on the type of project, number of units, bedroom mix, neighborhood, and other factors. There are no district standard rates. In order to estimate the number of students generated by this project, SDUSD referenced existing similar developments in the project vicinity, as well as additional projects that have been proposed in the area. Based on planned and proposed projects, SDUSD was able to estimate student generation rates for the project. The student generation rates are the average from the existing developments and proposed developments, with a low and high range.

Student generation rates based on the average from existing and planned developments, with a low and high range, and are shown in Table 5.11-2, *Estimated Generation Rates for Witt Mission Valley Project*.

Table 5.11-2. Estimated Generation Rates for Witt Mission Valley Project

Proposed Development	Address	Number of Units	Student Generation Rate	Estimated Number of Students
Witt Mission Valley Project	588 Camino del Rio North San Diego, CA 92108	267	K-5: 0.034-0.068 6-8: 0.006-0.012 9-12: 0.009-0.018	K-5: 9-18 6-8: 2-3 9-12: 2-5
TOTAL			K-12: 0.048-0.096	K-12: 13-26

Source: SDUSD, August 16, 2017.

Based on the estimated student generation, the project would generate approximately 13 – 26 students. SDUSD concluded that the project is not specifically expected to have an adverse impact upon district schools. The existing schools have sufficient capacity in the near-term to serve these students, and the project would not result in the need for new or expanded school facilities. However, when the project is considered in combination with on-going development as well as other proposed projects in the immediate vicinity, the cumulative potential increase in students could impact district schools to the point of reaching capacity. This scenario would require additional planning for sufficient facilities.

Senate Bill 50 (SB 50), also known as the “Class Size Reduction Bill,” was enacted in 1998. While SB 50 authorizes the collection of developer fees for school facilities construction, it also establishes a maximum cap on such fees (and indexes for inflation). Developer fees collected pursuant to SB 50 are “deemed to be full and complete

mitigation” (California Government Code Section (CGC) 65995 *et seq.*). SB 50 also prohibits local agencies from denying land use approvals on the basis of inadequate school facilities, so long as the project proposed pays the developer fees if required to do so (CGC, Section 65995 *et seq.*). The project would be required to pay school fees in compliance with CGC Section 65995 *et seq.* With payment of the school facilities fee, impacts would be less than significant as stipulated by CGC Section 65995.

LIBRARY

Library services are provided by the SDPL. The City’s General Plan establishes goals and policies for the library system facilities. Per the General Plan, a library system should contribute to the quality of life through technologically improved services and welcoming environments. Branch libraries should be 15,000 square feet or larger and include features and services that address community-specific needs.

The project would result in approximately 463 residents, based on 1.85 persons per household and SANDAG’s current vacancy rate for multi-family residential units in the Mission Valley community (6.3 percent). Even with the population increase projected to be generated by the project, existing library systems would not be impaired, nor would additional or expanded library facilities be required. Because residents may use the Mission Valley Library or any branch library that is part of the San Diego Public Library system, the existing branches could adequately serve the increase in residents from the project, and no new or altered facilities would be required. Furthermore, development impact fees, which would be used to maintain as well as fund future facilities, would be paid prior to building permit issuance. Impacts to library service would be less than significant.

PARKS OR OTHER RECREATIONAL FACILITIES

The *Recreation Element* of the General Plan provides “Park Guidelines” to address Open Space, Resource-Based Parks, and Population-Based Parks. Open Space and Resource-Based Parks serve the larger regional and/or visitor population. Population-Based Parks (commonly known as Neighborhood and Community Parks) are facilities and services that are located in close proximity to residential development and are intended to serve the daily needs of the neighborhood and community. When possible, these parks adjoin schools in order to share facilities and are ideally within walking distance of the residences within their service area. Community Parks are intended to meet a minimum standard of providing 2.8 acres per 1,000 population. The General Plan’s Recreation Element minimum standard of 2.8 acres per 1,000 people for population-based parks can be achieved through a combination of neighborhood and community park acreages and park equivalencies. The service requirements for Population-Based parks are included in the table below:

Mission Valley contains two public recreational amenities: Sefton Field, which houses four little league fields approximately three miles west of the project site and a public park located within the Civita development, located approximately 1.5 miles northeast of the project site. In 2013, the City approved the San Diego River Park Master Plan. A major portion of the San Diego River Park Master Plan is within the Mission Valley community. When fully implemented, the San Diego River Park will provide a natural park for the City. The San Diego River Park Master Plan envisions a waterway that is healthy, accessible to the public, and inhabited with wildlife. The plan provides guidance on how the San Diego River can be reasserted as the focus of the River valley and become an asset to the community. Included as part of the San Diego River Park Master Plan is an integrated and connected trail system, which will provide additional opportunities for recreation along the San Diego River. Even with these park resources, based on 2015 population estimates, the Mission Valley community is deficit 46.63 acres of population based parks.

There are limited semiprivate recreational facilities at the western end of Mission Valley. The Mission Valley YMCA is a semiprivate facility located at 5505 Friars Road. The YMCA provides both indoor and outdoor recreational opportunities in a park-like setting along the River. The Mission Valley Community Plan includes two additional park-like recreation areas are planned for future development by the City on City-owned land in Mission Valley. One location is identified in the vicinity of Qualcomm Stadium, and the second location is near the existing YMCA.

Park Type	Guidelines	Typical Components
<i>Community Parks – Qualify to meet 2.8 ac/1,000 population minimum standard</i>		
Major Park	<ul style="list-style-type: none"> 20 acres minimum; approximately 30 acres typical Serves single or multiple community plan area(s) population(s) Parking provided 	<ul style="list-style-type: none"> Specialized facilities that serve larger populations Passive and active recreation facilities Facilities found in Community Parks Could include facilities found in Special Activity Parks Community and cultural facilities Also called “Great Parks” or “Grand Parks”
Community Park	<ul style="list-style-type: none"> 13 acre minimum (consistent with program facilities on-site) Serves population of 25,000 Typically serves one community plan area but depending on location, may serve multiple community planning areas Parking provided 	<ul style="list-style-type: none"> Passive and active recreation facilities Facilities found in Neighborhood Parks Could include facilities found in Special Activity Parks Community cultural facilities Recreation centers Aquatic complexes Multi-purpose sports fields
<i>Neighborhood Parks – Qualify to meet 2.8 ac/1,000 population minimum standard</i>		
Neighborhood Park	<ul style="list-style-type: none"> Three acres to 13 acres Serves population of 5,000 within approximately one mile Accessible primarily by bicycling and walking Minimal parking as necessary, only if five acres or more 	<ul style="list-style-type: none"> Picnic areas, children’s play areas, multi-purpose courts, multi-purpose turf areas, comfort stations, walkways, and landscaping Also called “Greens” in urban settings
Mini Park	<ul style="list-style-type: none"> One acre to three acres Serves population within ½ mile Accessible by bicycling and walking No on-site parking, except for disabled access May require funding source for extraordinary maintenance 	<ul style="list-style-type: none"> Picnic areas, children’s play areas, small multi-purpose courts, multi-purpose turf areas, walkways, and landscaping Also called “squares” in urban settings
Pocket Park or Plaza	<ul style="list-style-type: none"> Less than one acre Serves population within ¼ mile Accessible by bicycling and walking No on-site parking, except for disabled access May require funding source for extraordinary maintenance 	<ul style="list-style-type: none"> Primarily hardscape Picnic areas, children’s play areas, walkways, and landscaping Multi-purpose courts Multi-purpose turf areas

Several regional recreational amenities are located near to the Mission Valley community. These include Balboa Park, Presidio Park, and Mission Bay Park. Balboa Park encompasses more than 1,000 acres and is located just north of downtown San Diego, approximately three miles south of the project site. Future residents of the project could easily access these regional recreation amenities.

The project would introduce 463 residents at the site, based on the proposed 277 units, SANDAG’s current vacancy rate for multi-family residential units in the Mission Valley community (6.3 percent), and a density factor of 1.85 persons per household, which would require 1.3 acres of population-based parkland. While the community of Mission Valley has a deficit of existing required park space, the project would not impair existing facilities. The

project is consistent with the Mission Valley Community Plan and would not result in a significant impact on public parks. The project would pay Development Impact Fees (DIF). The park portion of the current per-unit DIFs to be paid at the time of building permit issuance provides for public facilities required to support the proposed population including the population-based park usable acreage, recreation centers, and aquatic complexes. No mitigation is required.

Additionally, the project would provide active recreational amenities on-site in the form of a pool/spa area and fitness center, as well as passive recreation space in the additional project courtyards. As noted above, Mission Valley contains two public recreational amenities a little league baseball facility and a public park located within the Civita development. These parks would serve community residents, as well as visitors to Mission Valley. Additionally, it is anticipated that the residents of Mission Valley would likely utilize the various regional parks located within close proximity to the project site for recreational needs. These parks have been developed as regional amenities with the purpose of providing active and passive recreation to residents of the region. Because the three regional parks are all located less than five miles from the project site, it is likely that users from the project would partake in these parks more or less equally, diffusing potential use of project residents to all three parks. Due to the regional nature of these parks and the likely diffusion of use, adverse impacts to the regional park amenities would not occur. The project would not result in impacts to recreational facilities.

MAINTENANCE OF ROADS

Maintenance of existing and planned public facilities would be the responsibility of the City of San Diego and would be funded by the City's General Fund. The project would be responsible for constructing on-site facilities, such as the various project courtyards and outdoor amenity space. The project would not have a substantial effect on the maintenance of existing and planned public facilities.

Significance of Impacts

The project would not result in significant impacts to police protection, fire/life safety protection, libraries, parks, or other recreation facilities, and schools.

Mitigation Measures

Mitigation would not be required.

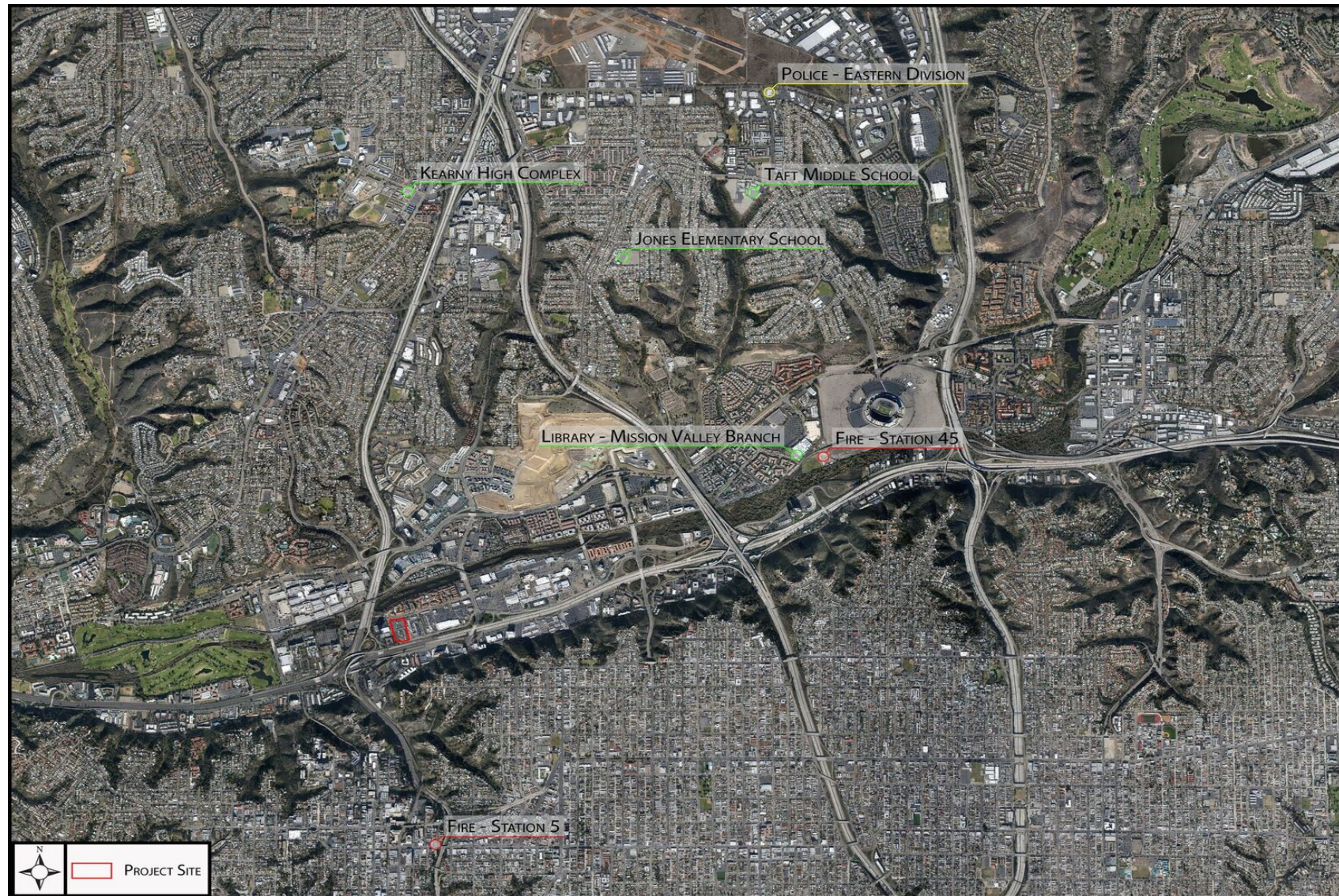


Figure 5.11-1. Location of Public Services

5.12 Public Utilities

This section evaluates the availability and provision of public utilities to serve the project site, as well as any public utilities-related impacts that would result from the project. The evaluation is based on various studies and correspondence with utility company providers included as Appendix F. A *Waste Management Plan* was prepared for the project by KLR Planning (March 2018) and has been included as Appendix N.

5.12.1 Existing Conditions

Public utilities include water, sewer, storm water drainage, and solid waste management on a community-wide basis. These services would be provided to future residents, employees, and visitors to the project. (*NOTE:* Public utilities also include the provision of electricity and natural gas resources which would provide energy to the project. SDG&E would provide electricity and natural gas service to the project. Please see Section 5.6, *Energy*, for a discussion of SDG&E's ability to serve the project and the project's potential impact on energy resources.) Public utilities providers were contacted during preparation of this EIR to identify potential impacts that the project would have on utilities.

WATER

Public Utilities Department. The project is located within the service area of the City's Public Utilities Department. The Public Utilities Department treats and delivers more than 200,000 acre-feet per year (AFY) of water to more than 1.3 million residents. The water system extends over 404 square miles, including 342 square miles within the City of San Diego. The Public Utilities Department's potable water system serves the City of San Diego and certain surrounding areas, including both retail and wholesale customers. In addition to delivering potable water, the City has a recycled water program. The City's objectives relative to the water system are to optimize the use of local water supplies, lessen the reliance on imported water, and free up capacity in the potable water system. Recycled water provides the City with a dependable, year-round, locally produced, and controlled water resource.

The Public Utilities Department relies on imported water as its major water supply source and is a member public agency of the San Diego County Water Authority (SDCWA). The SDCWA is a member agency of the Metropolitan Water District (MWD). The statutory relationships between the SDCWA and its member agencies, and MWD and its member agencies, respectively, establish the scope of the Public Utilities Department's entitlements to water from these two agencies. The Public Utilities Department currently purchases approximately 85 to 90 percent of its water from the SDCWA, which supplies the water (raw and treated) through two aqueducts consisting of five pipelines. While the Public Utilities Department imports a majority of its water, it uses three local supply sources to meet or offset potable demands: local surface water, conservation, and recycled water.

Metropolitan Water District.

Metropolitan Water District's (MWD's) Integrated Water Resources Plan (IWRP) identifies a mix of resources (imported and local) that, when implemented, will provide 100 percent reliability for full-service demands through the attainment of regional targets set for conservation, local supplies, State Water Project supplies, Colorado River supplies, groundwater banking, and water transfers. The latest IWRP (2015) includes a planning buffer to mitigate against the risks associated with implementation of local and imported supply programs. The planning buffer identifies an additional increment of water that could potentially be developed if other supplies are not implemented as planned. The planning buffer is intended to ensure that the southern California region, including the City of San Diego, will have adequate water supplies to meet future demands.

San Diego County Water Authority.

The San Diego County Water Authority's (SDCWA's) 2015 Urban Water Management Plan (UWMP), in accordance with State law and the RUWMP, contains a water supply reliability assessment that identified a diverse mix of imported and local supplies necessary to meet demands over the next 25 years in average, single-dry year and multiple-dry year periods. The UWMP is based on SANDAG's 2050 Regional Growth Forecast, also referred to as SANDAG's Series 13 Forecast, which has been refined to include an economic outlook that factors in the current recession and the integration of 2010 Census counts. The UWMP documents slower regional growth in the near term and lower water demands over the long-term planning horizon. No shortages are anticipated within its service area. The SDCWA also prepared an annual water supply report for use by its members that provides updated documentation on existing and projected water supplies.

The SDWCA's 2015 UWMP provides for a comprehensive planning analysis at a regional level and includes water use associated with forecasted residential development as part of its municipal and industrial sector demand projections. These housing units were identified by SANDAG in the course of its regional housing needs assessment, but are not yet included in existing general land use plans of local jurisdictions.

The lower water demand associated with smaller estimated growth in overall housing unit projects over the 2020-2040 timeframe compared to SANDAG's previous Series 12 forecast. In addition, new housing units are weighted towards multi-family structures that traditionally use less water than single-family units. These units are not yet included in local jurisdiction's general plans, so their project demands are incorporated at a regional level.

Challenges to Regional Water Supply. Water supply for southern California faces many short-term and long-term challenges, including restrictions for endangered species and other environmental protections, droughts, funding shortfalls for new projects, climate change, and others. The Public Utilities Department, SDCWA, and MWD prepare and revise their water supply and management plans as needed to ensure their continuing ability to serve the water supply needs of the region. These agencies continue to adopt measures and develop new programs, policies, and projects to provide a greater degree of certainty during periods of prolonged drought or to offset possible reductions in other sources of supply.

Operation of the State Water Project along with the Central Valley Project in the San Joaquin Valley was challenged in 2007 in efforts to protect endangered species and habitat, resulting in reduction in the water delivery capacity of both projects. In efforts to ensure reliability of the Sacramento–San Joaquin Delta water supply, the MWD adopted a Delta Action Plan as a framework to address water supply risks in the Sacramento–San Joaquin Delta both for the near-, mid-, and long-term. In the near-term, MWD will continue to rely on plans and policies outlined in its RUWMP and IWRP to address water supply shortages and interruptions to meet water demands. Campaigns for voluntary water conservation, curtailment of replenishment water, and agricultural water delivery are some of the actions outlined in the RUWMP. If necessary, reduction in municipal and industrial water use and mandatory water allocation could also be implemented. MWD also entered into a series of agreements to ensure the stability of its Colorado River supplies and to gain substantial storage capacity in years with surplus supplies. As a result, MWD's water supply is anticipated to be restored to previous levels in the future.

At the local level, the SDCWA is in the process of minimizing the amount of water it purchases from MWD by diversifying its water supply portfolio. The SDCWA intends to increase its local water supplies to 40 percent of the region's water supplies by 2020 through conservation programs, recycling, and groundwater development projects.

In addition, the Public Utilities Department emphasizes the importance of water conservation to minimize water demand and avoid excessive water use. In accordance with Municipal Code Section 147.04, all residential, commercial, and industrial buildings, prior to a change in ownership, are required to be certified as having water-conserving plumbing fixtures in place.

Also, in accordance with the Conservation Element of the City's General Plan (Policy CE-A.11), development projects shall implement sustainable landscape design such as planting "deciduous shade trees, evergreen trees, and drought-tolerant native vegetation, as appropriate, to contribute to sustainable development goals" and using "recycled water to meet the needs of development projects to the maximum extent feasible" to aid in water conservation.

The Public Utilities Department's Water Conservation Program, established in 1985, accounts for approximately 32,000 acre-feet (AF) of potable water savings per year. These savings have been achieved through creation of a water conservation ethic, and implementation of programs, policies, and ordinances designed to promote water conservation practices, including irrigation management. These programs undergo periodic reevaluation to ensure realization of forecasted savings. The Public Utilities Department also examines new water saving technologies and annually checks progress toward conservation goals, working collaboratively with the MWD and SDCWA to formulate new conservation initiatives.

Global Climate Change. The MWD's sources of water supply could be negatively impacted by global climate change and associated challenges, including, but not limited to: reduction in the average annual snow pack; changes in the timing, intensity, location and amount, and variability in precipitation; long-term changes in watershed vegetation and increased incidence of wildfires; rise in sea level; increased water temperatures; and changes in urban and agricultural water demand.

While the impacts of global climate change on MWD's water supply cannot be meaningfully quantified at this time, MWD has taken actions to decrease potential impacts of climate change on the reliability of its water supplies, which are reflected in its IWRP and RUWMP. In addition to policies emphasizing diversification and adaptability of supply sources to manage uncertainties, current MWD water supply planning stresses the importance of local water supplies such as conservation, water reclamation, and groundwater recharge, which would be less affected by global climate change. MWD has also entered into agreements to store water in groundwater reservoirs within and outside Southern California.

The SDCWA is currently in the planning phase for projects to obtain potable water from ocean desalinization plants, which would relieve pressure on imported water sources and expand the local water supply.

Water Supply Assessment (WSA) and Verification. California State SB 221 and SB 610 went into effect January 2002 with the intention of linking water supply availability to land use decisions made by cities and counties. SB 610 requires water suppliers to prepare a WSA report for inclusion by land use agencies within the CEQA process for new developments subject to SB 221. SB 221 requires water suppliers to prepare written verification that sufficient water supplies are planned to be available prior to approval of large-scale subdivisions. As defined in SB 221 and SB 610, large-scale projects include residential development projects of more than 500 residential units and/or shopping centers or businesses employing more than 1,000 people or having more than 500,000 square feet of floor space. The project proposes 277 residential units, 3,600 square feet of commercial office space, and 6,000 square feet of retail space, replacing the existing 38,070 square feet of commercial use. The project does not meet the threshold of SB 610 and SB 221 and, therefore, a WSA and verification is not required for the project.

Water facilities exist within public streets rights-of-way in the project area. Specifically, a 12-inch water line is located in Camino de la Reina, and a 12-inch water line is located in Camino del Rio North.

SEWER

Wastewater treatment service is provided by the San Diego Public Utilities Department (PUD), which operates the Metropolitan Sewerage System (Metro System). Facilities in the Metro System include the Point Loma Wastewater Treatment Facility, ocean outfall pipes, pump stations, interconnecting interceptor sewers, and the North City and South Bay Water Reclamation Plants.

The Metro System provides wastewater transportation, treatment, and disposal services to the San Diego region. The system serves a population of 2.0 million from 16 cities and districts generating approximately 190 million gallons of wastewater per day (mgd). Planned improvements to the existing facilities will increase wastewater treatment capacity to serve an estimated population of 2.9 million through the year 2050. Nearly 340 mgd of wastewater will be generated by that year.

The PUD treats the wastewater generated in a 450-square mile area stretching from Del Mar and Poway to the north, Alpine and Lakeside to the east, and south to the Mexican border. The Point Loma Wastewater Treatment Facility currently treats approximately 175 mgd, with a capacity of 240 mgd. Sewer facilities have been built at the project site to serve the existing development.

Sewer lines are located within public streets right-of-way in the project area. Specifically, an eight-inch sewer line is located within Camino del Rio North. An 18-inch sewer line parallels the project sites east property boundary.

STORM DRAINAGE

Under current condition, storm water runoff sheet flows across the project site and is conveyed to an existing storm drain facility located within public street rights-of-way. Proximate to the project site are, two 18-inch storm drains located in Camino del Rio North, which forms the project site's southern boundary, and in Camino de la Reina, which forms the project site's northern boundary.

SOLID WASTE SERVICES

The City provides refuse collection for single- and multi-family residences located on public streets that meet City safe storage and access requirements; collection services for all other waste generators must be provided by franchised private hauling companies.

City of San Diego Environmental Services Department (ESD) pursues waste management strategies that emphasize waste reduction and recycling, composting, and environmentally-sound landfill management to meet the City's long-term management needs. The State of California mandated (AB 939/PRC 41730 et seq.) in 1989 that all cities reduce waste disposed of in landfills by 25 percent by 1995 and 50 percent by the year 2000 (using 1990 as a base year for waste generation data). Assembly Bill 341 has set a target of 75 percent minimum diversion rate. ESD developed a Source Reduction and Recycling Element (SRRE), as required by the PRC, to reduce wastes deposited of in landfills by 50 percent compared to 1990 base year tonnages. The SRRE describes the programs, activities, and strategies the City plans to carry out to achieve the mandated waste reduction and is updated each year in annual reports to CalRecycle.

Solid waste generated by the project during the occupancy phase would be hauled away by private collection services from franchised haulers for the City of San Diego. The waste would be taken to either the City of San Diego's West Miramar Landfill, which is located north of Highway 52 at 5180 Convoy Street in San Diego; the Sycamore Sanitary Landfill, located at 8514 Mast Boulevard in San Diego; or the Otay Landfill, located at 1700 Maxwell Road in Chula Vista.

Waste generated by the project that cannot be reduced, recycled, or otherwise diverted to beneficial use is expected to be transported to and disposed of at the West Miramar Landfill. Yearly, almost 910,000 tons of waste are disposed of at the West Miramar Landfill. The landfill is projected to reach capacity in 2025.

Currently, only two other landfills provide disposal capacity within the urbanized region of San Diego: the Sycamore and Otay Landfills. The Sycamore Landfill contains 324 disposal acres on a 491-acre site and is located to the east of Miramar, within the City of San Diego's boundaries. The Otay Landfill contains 230 disposal acres on a 464-acre site and is located within an unincorporated island of County land in the City of Chula Vista. The Sycamore and Otay Landfills are privately owned by Allied Waste Industries, Inc.

The Sycamore Landfill is permitted to receive a maximum of 5,000 tons per day. The permitted capacity of the Sycamore landfill is 71,233,171 cubic yards, and its remaining capacity as of December 31, 2014, was 39,608,998 cubic yards. This landfill is projected to cease operation on December 31, 2042. The Otay Landfill is permitted to receive 8,000 tons per day. Its permitted capacity is 87,760,000 cubic yards, with a remaining capacity of 15,527,878 cubic yards on June 30, 2014. It is estimated that the Otay Landfill will cease operation on August 31, 2025 (CalRecycle 2017.)

The solid waste management system infrastructure provides an essential public service to the citizens of California. There are three basic components in the solid waste management system: collection; processing to remove recyclable and compostable materials; and disposal of waste that cannot be recycled. These three components, coupled with the implementation of waste reduction and recycled material market development programs, ensure that the integrity of the solid waste management system is well maintained for the citizens of California.

Collection. Timely and adequate collection of solid waste protects public health and safety, and the environment. An effective collection system prevents unsightly, vector-propagating, and odorous waste accumulation outside residences and businesses. This also results in minimizing illegal disposal, discharge of waste to surface water bodies, and impacts to ecologically sensitive habitats. The effectiveness of California's recycling efforts begins at the source of generation, at the households and businesses, where many collection companies provide multiple bins that allow source separation of recyclables and green waste from the waste stream. Public education and outreach programs are essential elements of the solid waste management system, which brings awareness to the public in their recycling efforts and the positive outcomes achieved.

Disposal Facilities. California's landfills are considered among the best in the nation with respect to innovation, technology, and effectiveness in protecting the environment. Due to potential environmental impacts of landfills, the state's disposal system is heavily regulated by a multitude of regulatory agencies. As a result, landfill operators are required to implement best management practices and abide by permit conditions that ensure environmentally safe and sound operation of their landfills now and into the future.

Policies and Programs. Although user fees are limited in the City of San Diego, for the rest of California user fees have been the primary funding source for development of California's solid waste management system infrastructure and for implementation of waste reduction programs and educational campaigns. Volatile worldwide recycling markets continue to contribute to financial uncertainty and operational difficulty in local recycling programs. In addition, the solid waste infrastructure continues to be challenged with new regulations and mandates, making it even more costly and difficult to see positive growth. These fiscal constraints, coupled with reduced public acceptance of new solid waste management facilities, will require decision-makers to continue finding creative solutions to meet solid waste management needs.

5.12.2 Impact Analysis

Issue 1

Would the proposal result in the need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts with regard to the following utilities: natural gas, water, sewer, communications systems, and solid waste disposal?

Impact Thresholds:

Water

- If a project would result in a need for new systems, or require substantial alterations to existing water utilities which would create physical impacts.

Sewer

- If a project would result in a need for new systems, or require substantial alterations to existing sewer utilities which would create physical impacts.

Storm Drains

- If a project would result in a need for new systems, or require substantial alterations to existing storm drain facilities which would create physical impacts.

Solid Waste

- Projects that include the construction, demolition, or renovation of 1,000,000 square feet or more of building space may generate approximately 1,500 tons of waste or more and are considered to have direct impacts on solid waste facilities.

Please see Section 5.6, *Energy*, for a discussion of project energy use, including natural gas.

Impact Analysis

WATER/SEWER

The project is located within an urbanized area in the Mission Valley community. As such, water facilities have been installed to serve the project and adjacent areas. The size and capacity of these existing utilities would be adequate to serve the project. No new systems or alterations to the existing utilities would be required.

The project proposes a private sewer system to connect to public sewer facilities in adjacent public streets. The project's private sewer has been designed in general conformance with the City of San Diego Sewer Design Guide. The project would result in a reduction of the projected peak sewer flow-rate due to a change in the uses on the project site.

SOLID WASTE

The City's threshold for determining if a project would have a significant direct impact associated with solid waste generation is a project that includes the construction, demolition, or renovation of 1,000,000 square feet or more of building space that may generate approximately 1,500 tons of waste or more per year. The project would not generate more than 1,500 tons of solid waste per year and is under 1,000,000 square feet of building space; therefore, is below the City's threshold of significance for direct impacts on solid waste.

The project has prepared a WMP, which has been approved by the City's Environmental Services Department. (The approved WMP for the project is included in Appendix N.) Implementation of the WMP via permit conditions would ensure that the project would implement waste reduction measures during the construction and occupancy phases of the project. Measures identified in the WMP, when implemented, and compliance with local and State requirements would ensure that potential impacts to solid waste management facilities, including landfills, materials recovery facilities, and transfer stations, as well as services, including collection.

COMMUNICATIONS SYSTEMS

The project site is located within an urbanized portion of the City of San Diego currently serviced by a number of communications providers. Facilities are in place to continue communications services in the Mission Valley community. The project would not result in a significant impact to communications systems.

Significance of Impacts

The project would not result in significant impacts to water, sewer, solid waste, and communications systems. Impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

Issue 2

Would the proposal result in the use of excessive amounts of water?

Issue 3

Does the proposal propose landscaping which is predominantly non-drought resistant vegetation?

Impact Thresholds

Water

- If a project would use excessive amounts of potable water.
- If a project proposes predominantly non-drought resistant landscaping and excessive water usage for irrigation and other purposes.

Impact Analysis

The project would develop in accordance with Title 24 of the CCR. Title 24 requires the use of low-water use facilities which reduce water consumption. As such, project water saving features would include:

- Low flow water fixtures
- High efficiency toilets
- High efficiency irrigation systems

With use of these features, the project would not result in the use of excessive amounts of water. Impacts to water would be less than significant.

Relative to landscaping, the project proposes use of indigenous and drought tolerant plan material. All irrigation design and maintenance would conform to the City of San Diego's latest water use restrictions, and the project's irrigation system has been designed to meet the City's water efficient landscape ordinance contained within Article 2, Division 4, *Landscape Regulations*, of the Municipal Code. Additionally, the project would use a high efficiency irrigation system.

Significance of Impacts

The project would not result in significant impacts to water.

Mitigation Measures

Mitigation would not be required.

6.0 CUMULATIVE EFFECTS

Section 15355 of the State CEQA Guidelines describes “cumulative impacts” as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. These individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from a project is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

The discussion of cumulative impacts for the project considers both existing and future projects in the project vicinity. For this analysis, the project vicinity is defined as the west-central Mission Valley community. Existing and future projects are based on the following information sources:

- A summary of projections contained in the City’s General Plan and the Mission Valley Community Plan; and
- Past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the City of San Diego. These projects include those which result in or contribute to regional or area-wide conditions.

According to Section 15130 of the CEQA Guidelines, the discussion of cumulative effects *...need not be provided as great a detail as is provided 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 required by Section 15130 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, on in a prior environmental document which had 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. For analysis of cumulative impacts that are localized (e.g., traffic and public services), a list of past, approved, and pending projects was identified. The location of these projects is illustrated in Figure 6-1, *General Location of Cumulative Projects*.

Provided below is a description of the planning documents used in this analysis of cumulative effects, as well as the development projects that have been individually evaluated for their contribution to cumulative effects.

6.1 Plans Considered for Cumulative Effects Analysis

6.1.1 General Plan

The project is located within the City of San Diego. The City of San Diego’s General Plan sets forth a comprehensive, long-term plan for development within the City of San Diego. As such, the General Plan and development guidelines identified in the General Plan pertain to the project site. The current General Plan was adopted in March 2008 and represents a comprehensive update and replacement of the City’s 1979 *Progress*

Guide and General Plan. The City's General Plan includes incorporation of a Strategic Framework Element, which replaces the previous chapter entitled "Guidelines for Future Development."

San Diego comprises 219,241 acres (approximately 342 square miles); less than four percent of this land remains vacant and developable. The City expects to reach an estimated population of 1,542,324 by the Year 2020 and 1,690,232 by the end of 2030. Future development will require the City to reinvest in existing communities to plan for greater urbanization of infill sites. The City of San Diego General Plan identifies the project site as Commercial Employment, Retail, and Services.

6.1.2 Mission Valley Community Plan

The project site is located within the Mission Valley Community Plan area. The Mission Valley community is located within the central area of the City of San Diego, generally between the I-5 and I-15 freeways. The San Diego City Council first adopted the Mission Valley Community Plan on June 25, 1985. It has subsequently been amended numerous times, most recently in 2013.

The Mission Valley Community Plan is intended to serve as a comprehensive guide for residential, industrial, and commercial developments; open space preservation; and development of a transportation network within the community. The expected population in the Year 2035 is 34,145, based on SANDAG's population forecast for the Mission Valley community. The project site is identified for Commercial-Retail uses in the Mission Valley Community Plan. The project proposes a mix of residential, retail, and commercial uses and complies with the Mission Valley Community Plan's Multiple Use Development option.

6.2 Projects Considered for Cumulative Effects Analysis

As stated above, the past, present, and probable future projects considered in this cumulative analysis would produce related or cumulative impacts when evaluated in relation to the potential impacts of the project. Table 6-1, *Witt Mission Valley Cumulative Projects List*, includes a list of projects considered in the analysis of cumulative effects. Descriptions of development projects that have been individually evaluated for their contribution to cumulative effects are provided below.

6.3 Cumulative Effects Analysis

6.3.1 Cumulative Impacts Found to Be Significant

The project would result in cumulatively significant impacts in the area of: Transportation/Circulation.

TRANSPORTATION/CIRCULATION

As discussed in Section 5.2, *Transportation/Circulation*, the project would result in cumulative impacts related to traffic circulation when considered in concert with other proposed or approved projects in the project area. The Focused Transportation Study prepared for the project considered in the analysis of cumulative (2035) transportation and traffic circulation impacts:

- Alexan Fashion Valley
- Camino del Rio Mixed-Use (currently being developed as Millennium Mission Valley)

In the evaluation of cumulative transportation/circulation impacts, the cumulative (Year 2035) analysis functions as the cumulative analysis for the project, because the project is consistent with the Mission Valley Community Plan. When considered with the other cumulative projects, one significant cumulative impact to the street segment of Camino del Rio North from Camino de la Siesta to Camino del Arroyo would result, as presented in Section 5.2. The project would not result in any cumulative impacts at project area intersections. As presented in Section 5.2, mitigation measure MM 5.2-1 would be required to mitigate the project's contributions to cumulatively significant transportation/circulation impacts to below a level of significance.

6.3.2 Cumulative Impacts Found Not to Be Significant

Based on the analyses contained in Section 5.0 of this EIR, the project's contribution to land use, visual effects and neighborhood character, air quality, greenhouse gas emissions, energy, noise, geologic conditions, historical resources, tribal cultural resources, health and safety, public services and facilities, and public utilities impacts would not be cumulatively considerable, as analyzed below.

LAND USE

As discussed in Section 5.1, *Land Use*, development on the project site is governed by the City's General Plan, the Mission Valley Community Plan, and the City's Land Development Code (including the Mission Valley Planned District Ordinance). Additionally, the project site is regulated by the Montgomery Field ALUCP, San Diego International Airport ALUCP, and is within the City's MSCP area. For a detailed discussion and analysis of all these plans, refer to Section 5.1, *Land Use*.

The project would be consistent with all applicable goals, policies, and objectives of the General Plan. As presented in Section 5.7, *Noise*, the project would result in interior noise levels in excess of the City's Noise Compatibility Guidelines requirements. However, project design features, including windows with STC ratings higher than those provided by standard building construction and air conditioning, would be implemented as part of the project. Additionally, interior noise levels would be attenuated in accordance with Title 24, which would bring the project into conformance with the General Plan's Noise Compatibility Guidelines.

Cumulative noise impacts could also result from increases in traffic volumes associated with the project when combined with other foreseeable projects in the area. The project itself would result in an increase in noise levels from traffic equivalent to less than 0.5 dBA CNEL, well below the threshold increase of 3.0 CNEL, and no mitigation would be required. Other projects in the area would generate noise levels that could exceed thresholds. Projects requiring a discretionary permit would be reviewed under CEQA and, as applicable, would be required to prepare site-specific noise analysis evaluating consistency with the General Plan and identifying if significant noise impacts could result. If there is a potential for impacts, mitigation measures would be required to reduce cumulatively significant noise impacts to below a level of significance. Therefore, cumulative noise impacts associated with traffic-related noise would not occur.

The project would be consistent with the Mission Valley Community Plan's objectives, proposals, and development guidelines, with the exception of a solar access development guideline within the Design Element (i.e. locating the majority of the project's glass areas on the south elevation). This inconsistency does not result in a significant impact, as the solar access development guideline is intended to reduce project energy use, which is a policy encapsulated within the project's sustainable development envelope. Additionally, this inconsistency would not result in a significant cumulative impact.

Other projects considered in this cumulative effects analysis would be evaluated to determine conformance with the City's General Plan, Mission Valley Community Plan, Mission Valley PDO (as applicable), and the City's Land Development Code, and would be required to comply with these policy documents and applicable ordinances. Projects that are not consistent with the General Plan/Community Plan land use designation(s) or existing zoning would require processing of a General Plan/Community Plan Amendment and/or rezone. Projects needing a General Plan/Community Plan Amendment are required to demonstrate conformance with pertinent goals, policies, and recommendations. As demonstrated, the project, when considered with other planned development in the Mission Valley Community Plan area and with the cumulative projects outlined in Section 6.2, *Projects Considered for Cumulative Effects Analysis*, would not result in a significant cumulative impact due to inconsistency or conflict with an adopted land use plan, land use designation, or policy.

VISUAL EFFECTS and NEIGHBORHOOD CHARACTER

As discussed in Section 5.3, *Visual Effects and Neighborhood Character*, the project would redevelop a site that is currently developed with uses that include auto sales and service. The project would not open up an area for new development. The project would result in a positive affect on the overall community character, replacing the current auto sales and maintenance uses largely surrounded by chain link fence with barbed wire with a mixed-use development that provides for residential, commercial, and retail uses designed in a manner that complements surrounding development. The project is located in an area where surrounding land is fully developed, and the project's impacts on neighborhood character are limited to the immediate project area. Cumulatively significant impacts to neighborhood character would not occur. When considered with other projects in Mission Valley, the project would not result in a considerable contribution to cumulative impacts associated with visual effects and neighborhood character.

The project would not result in significant lighting and glare impacts and would not create a new source of substantial light that would adversely affect daytime or nighttime views in the area. Lighting would be in conformance with Section 142.0740 of the City of San Diego Land Development Code, and impacts from glare would be avoided by complying with Section 142.0730 of the City of San Diego Land Development Code. Other projects in the Mission Valley community would also be subject to City ordinances regulating lighting and glare. Cumulative impacts would not result.

AIR QUALITY

As discussed in Section 5.4, *Air Quality*, the SDAB is considered a nonattainment area for the 8-hour NAAQS for O₃, and is considered a nonattainment area for the CAAQS for O₃, PM₁₀, and PM_{2.5}. The evaluation of emissions of nonattainment pollutants was conducted and it was determined that emissions of all nonattainment pollutants would be below the screening-level thresholds. Emissions of all pollutants would be below the significance thresholds for operations.

As discussed in Section 5.4, the project's construction-related emissions would not exceed the applicable regional emissions thresholds designed to provide limits below which project emissions would not significantly change regional air quality. Similarly, all other projects would also have to achieve applicable standards relative to construction-related emissions. As such, the project's incremental contribution to air quality impacts would be less than significant.

The area surrounding the project is already developed; the project provides infill development. Because the project is consistent with the RAQS, SIP, the General Plan, and the Mission Valley Community Plan, it would not

result in a cumulatively considerable increase emissions of ozone precursors (NO_x and VOCs). Relative to cumulative operational emissions, because operational emissions for development of the project are below the significance thresholds for nonattainment pollutants, they would not result in a cumulatively considerable impact.

Other projects within the air basin would generate emissions that could exceed thresholds, contributing to poor air quality. Projects requiring a discretionary permit would be reviewed under CEQA and, as applicable, would be required to prepare an air quality analysis evaluating consistency with the RAQS and SIP and identifying if significant air quality impacts could result. If there is a potential for impacts, mitigation measures would be required to reduce cumulatively significant air quality impacts to below a level of significance. No cumulative impacts to air quality would occur.

GREENHOUSE GAS EMISSIONS

As discussed in Section 5.5, *Greenhouse Gas Emissions*, the project would be consistent with the CAP Consistency Checklist. By nature, global climate change evaluations are a cumulative study, which take into account the entirety of the immediately surrounding area. The project would not conflict with the CAP or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases. The project would not result in a significant impact relative to plans, policies, or regulations aimed at reducing GHG emissions.

Other projects in the regional would have to demonstrate consistency with the CAP and other applicable plans, policies, or regulations. Cumulative impacts would therefore be less than significant.

ENERGY

As discussed in Section 5.6, *Energy*, the project proposes a change in use from what has been developed on the site. However, the project would not result in a substantial increase in energy consumption or significant cumulative impacts associated with energy use. The project would not use power in excess of that anticipated for the proposed uses. No adverse effects on non-renewable resources are anticipated. The project would follow UBC and Title 24 requirements for energy efficiency in effect at the time of construction that would reduce the project's overall demand for energy as well as LEED Silver for Homes Certification. As such, the project would operate more efficiently than existing development constructed on the project site and would not result in a cumulatively considerable contribution on energy demand.

Other projects developed within Mission Valley would be required to follow current or future UBC and Title 24 requirements for energy efficiency that are applicable at the time individual projects come forward. Therefore, a cumulatively considerable impact on energy supplies would not result.

NOISE

As presented in Section 5.7, *Noise*, the project would not generate significant noise levels affecting ambient off-site noise levels. Furthermore, the project would not generate noise that, when added to noise generated by other projects considered as part of this cumulative effects evaluation, would be regarded as cumulatively significant. Construction activity would occur during allowable times and generate sound levels below 75 dBA Leq (12 hours) at residential zones, in compliance with Section 59.5.404 of the City of San Diego Municipal Code. The project could generate groundborne construction vibration that could be "strongly perceptible" but not "disturbing" to occupants, and would not damage the structure. The project would produce noise levels less than 52.5 dBA Leq at adjacent residential uses (off-site and on-site) and less than 60 dBA Leq at adjacent commercial land uses, and

would comply with City of San Diego Municipal Code noise limits. Refuse vehicles or parking lot sweepers would operate on the project site between 7:00 AM and 7:00 PM.

Operation of the project would include HVAC units, truck deliveries, and maintenance activities such as parking lot sweepers and trash collection trucks. The project would not include any trash compactors, refrigeration units, or generators. Residential, commercial, and retail HVAC units would be roof-mounted, behind parapets exceeding equipment heights. No equipment would be ground-mounted. Deliveries include trucks approaching and maneuvering into position; moving merchandise within the vehicle; rolling of a dolly on a ramp, sidewalk, or road; and/or a truck-mounted refrigeration unit. These activities produce average noise levels of approximately 75 dBA (10 minutes) at 25 feet.

The project would produce noise levels less than 52.5 dBA Leq at adjacent residential uses (offsite and on-site) and less than 60 dBA Leq at adjacent commercial land uses and would comply with City of San Diego Municipal Code noise limits. Refuse vehicles or parking lot sweepers would operate on the project site between 7:00 a.m. and 7:00 p.m. The impact of project generated operational noise would be less than significant.

The project and future projects within Mission Valley would be required to adhere to the Federal, State, and local standards and regulations, and standard construction noise reduction design measures to comply with City noise standards. These regulations would reduce cumulative construction and operational noise levels below standards established in the Noise Ordinance.

HISTORICAL RESOURCES

As discussed in Section 5.8, *Historical Resources*, no historical structures are located on the project site. Development on the project site began in 1966, therefore, existing buildings could be more than 45 years old. However, as presented in Section 5.8, *Historical Resources*, the property does not meet local criteria as an individually significant resource under the adopted Historic Resource Boards Criteria. Therefore, no potentially significant structures are present on the property and the project would not adversely affect an historic resource. While no significant archeological resources have been identified on the project site, project development involves grading that may have the potential to unearth previous unknown subsurface archaeological resources in an area of the City that has been identified as sensitive with regard to prehistoric resources. As a result, the project has the potential for significant impacts to occur to unknown resources encountered during excavation activities. mitigation measure MM 5.8-1 would be implemented in the event subsurface archaeological resources or human remains are encountered.

Projects which could occur within Mission Valley could have a similar potential to adversely affect unknown subsurface resources, which could result in a cumulatively significant impact to archaeological resources. Similar to the project, other projects would be required to conduct a survey of sensitive areas and implement appropriate mitigation measures, in accordance with CEQA and City regulations.

TRIBAL CULTURAL RESOURCES

As discussed in Section 5.9, *Tribal Cultural Resources*, tribal cultural resources are not present on the project site. However, project development involves grading that may have the potential to unearth unknown subsurface TCRs (in the form of archaeological resources). The City of San Diego conducted tribal consultation with the Lipay Nation of Santa Isabel and the Jamul Indian Village, both tribes agreed with the determination that potential impacts

could result to TCRs. Mitigation measure MM 5.8-1 would be implemented in the event important resources are encountered.

Projects that would occur within Mission Valley could have a similar potential to adversely affect unknown TCR, which could result in a cumulatively significant impact. In accordance with the requirements of Public Resources Code 21080.3.1, other project would have to provide formal notification requesting consultation with tribes affiliated with the project area. Similar to the project, other projects would be required to implement appropriate mitigation measures to reduce impacts. Therefore, cumulative impacts would not result.

HEALTH AND SAFETY

As discussed in Section 5.10, *Health and Safety*, an Envirofacts search found that the current use on the project site, Witt Lincoln, is listed as a small quantity generator for hazardous waste generator and a GeoTracker search found two closed leaking underground storage tank cases on the project site. However, these do not constitute a significant impact as it is assumed Witt Lincoln is permitted and regulated as a small quantity generator for hazardous waste generator. In addition, this use would no longer exist under the proposed project as the project is a mixed-use development and would not generate hazardous waste. The two closed leaking underground storage tank cases on the project site are solved and do not result in a significant impact.

The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

The project is not located within the vicinity of a private airstrip, or within two miles of a public airport, or public use airport, and would therefore not result in a safety hazard for people residing or working in the project area. The project is located within the Montgomery Field and San Diego International Airport AIAs, but would no conflict with either airport's ALUCP. The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Other projects would also be required to demonstrate compliance with City policies relative to health and safety, as well as with applicable ALUCPs. Other projects would analyze health and safety effects on the project relative to emergency response and wildland fire and would be required to implement measures to ensure that significant health and safety impacts do not occur. No cumulatively significant impacts are anticipated.

PUBLIC SERVICES AND FACILITIES

As discussed in Section 5.11, *Public Services and Facilities*, public services and facilities include population-based uses, including schools, libraries, and parks, as well as police and fire protection. No cumulatively significant impacts to public services and facilities would occur. The project is located within an area of Mission Valley that is developed and contains the necessary police and fire-rescue infrastructure. The project does not necessitate the need to expand or provide new facilities. Relative to parks, the project would be required to pay DIFs, a portion of which would go to developing and maintaining parks within Mission Valley. The project would not result in a significant impact to these services' ability to serve the community.

Relative to schools, public school service within the project area is provided by SDUSD. Correspondence with SDUSD indicates that, although the project would not have an adverse impact upon SDUSD schools, in combination with other developments, the cumulative potential increase in students could affect SDUSD schools to the point of reaching capacity and requiring additional planning for sufficient facilities. SB 50, also known as the “Class Size Reduction Bill,” was enacted in 1998. Developer fees collected pursuant to SB 50 are “deemed to be full and complete mitigation” (California Government Code Section 65995 *et seq.*). The project would be required to pay school fees in compliance with CGC Section 65995 *et seq.*, as would future projects developing in Mission Valley and within the District as a whole. With payment of the school facilities fee, cumulative impacts would be less than significant as stipulated by California Government Code Section 65996.

Future cumulative projects that could result in developments within Mission Valley would be evaluated to ensure adequate police and fire-rescue services are available at the time individual projects come forward. Additionally, future projects would be required to mitigate any significant impacts to population-based resources, such as schools, libraries, and parks. These requirements would ensure that no cumulative impacts to public services and facilities would occur.

PUBLIC UTILITIES

As discussed in Section 5.12, *Public Utilities*, public utilities include water, sewer, storm water drainage, and solid waste disposal on a community-wide basis. Relative to public utilities such as water and sewer, the project would be served by existing utilities and does not have potential to contribute to cumulative effects associated with these public utilities. Other projects would also analyze their effects on public utilities such as water and sewer and provide mitigation as necessary. No cumulative impacts would occur.

As described in Section 3.0, *Project Description*, the project is comprised of a mix of residential, commercial, and retail uses. The resulting estimate of solid waste to be generated by the project is approximately 359 tons per year, as shown in Table 6-2, *Estimated Solid Waste Generation from the Witt Mission Valley Project – Occupancy Phase*. The City’s threshold for determining if a project would have a significant cumulative impact associated with solid waste generation is a project that includes the construction, demolition, and/or renovation of 40,000 square feet or more of building space that may generate approximately 60 tons of waste or more per year. The project would exceed the City’s threshold for cumulative impacts as it would generate more than 60 tons per year of waste with building space in excess of 40,000 square feet and would, therefore, contribute to a significant cumulative impact associated with solid waste. A WMP was prepared for the project and approved by ESD. Implementation of the WMP through permit conditions would ensure that the project’s contribution to cumulative solid waste impacts would be less than significant.

Table 6-2. Estimated Solid Waste Generation from the Witt Mission Valley Project – Occupancy Phase

Use	Intensity	Waste Generation Rate	Estimated Waste Generated (tons/year)
Residential	277 units	1.2 tons/year/unit	332.4
Commercial-Retail	9,600 sq ft	0.0028 tons/year/sq ft	27
TOTAL			359.4

In accordance with ESD guidelines pertaining to new developments that are expected to generate large amounts of solid waste, a Waste Management Plan was required for the project, as well as other development projects in San

Diego. The plan addresses solid waste management techniques for demolition, construction, and operational activities, including reuse and recycling of materials. To reduce the amount of waste generated by demolition activity, the demolished materials would be sorted at the project site and recycled in accordance with the demolition debris recycling strategies given by the City of San Diego Environmental Services Department. Additionally, the City's Municipal Code requires that new multi-unit residential and commercial/industrial developments provide adequate space for storage and collection of refuse and recyclable materials. The project, as well as other development projects, would be required to comply with this requirement. Cumulative impacts associated with solid waste disposal would be avoided by adherence to City requirements.

Table 6-1. Witt Mission Valley Cumulative Projects List

Reference No.	Project Name	Location	Description	Environmental Document	Status
1	Homewood Suites (PTS No. 322356)	2201 Hotel Circle South	Site Development Permit to demolish an existing hotel and construct a 216-guestroom, five-story hotel on a 4.44-acre lot that contains Environmentally Sensitive Lands (Steep Hillsides). The project site is zoned MV-CO-CV (Mission Valley Planned District Ordinance – Commercial Office and Visitor Commercial).	MND	Completed.
2	Union Tribune Mixed Use (PTS No. 277550)	350 Camino De La Reina	Site Development Permit and Vesting Tentative Map to construct 198 residential condominium units, 234,415 square feet office space, and 6,470 square feet of retail space on a 12.86-acre site (the site of the existing Union Tribune newspaper building). This site is zoned MV-I (Mission Valley Planned District – Industrial).	EIR	Permits issued.
3	Legacy International Center (PTS No. 332401)	875 Hotel Circle South	Proposed amendment to the Mission Valley Community Plan, an amendment to the Atlas Specific Plan, a Planned Development Permit, a Site Development Permit, Conditional Use Permits, and a Vesting Tentative Map. Located on an approximate 18-acre site, this project would demolish the existing Mission Valley Resort Hotel and construct a mixed-use project involving religious, lodging, administrative, recreational, and commercial retail uses. The Legacy International Center site is zoned MV-M/SP (Multiple Use/Specific Plan) by the Mission Valley Planned District Ordinance.	EIR	Under construction.
4	Residence Inn SDP (PTS No. 322365)	445 Camino Del Rio South	Site Development Permit to demolish an existing restaurant (formerly the location of El Torito) and construct a 118-guestroom, five-story hotel with underground parking. The project site is approximately 1.41 acres in size. The site is zoned MV-CO-CV in the Mission Valley Planned District Ordinance.	Exempt	Completed.

6.0 CUMULATIVE EFFECTS

Reference No.	Project Name	Location	Description	Environmental Document	Status
5	Quarry Falls (Civita) (PTS No. 49068)	North side of Friars Road, between Mission Center Road and I-805	The Quarry Falls project (now called Civita) is a mixed-use development currently under construction. When complete, the master planned development would include public parks, civic uses, open space and trails; a maximum of 4,780 residential units; a maximum of 603,000 square feet of retail space; and a maximum of 620,000 square feet of office/business park uses.	PEIR	Under Construction.
6	Hazard Center Drive Extension (PTS No. 389747)	Mission Center Road to Fashion Valley	Hazard Center Drive is to be extended to connect to Fashion Valley from Mission Center Road. This connection is expected to provide another route parallel to Friars Road for traffic traveling in the east-west direction.	A project feature in the Hazard Center EIR Project No. 146803 <u>Supplemental EIR</u> <u>EIR Addendum</u>	Under Construction.
7	Hazard Center Drive Redevelopment Project (PTS No. 146803)	7510 Hazard Center Drive, 1370 Frazee Road, and 7676 Hazard Center Drive	Site Development Permit, Planned Development Permit, Community Plan Amendment, Specific Plan Amendment, and Vesting Tentative Map to demolish a portion of an existing commercial space and construct up to 473 residential units (including up to 48 affordable units) and approximately 4,205 square feet of commercial retail/restaurant space on a 14.52-acre site located on Hazard Center Drive at Frazee Road. The Hazard Center Redevelopment Project site is zoned OF-1-1 (Open Space—Floodplain) Zone and MV-M/SP.	EIR	Approved.
8	Camino del Rio Mixed Use (Millenium Mission Valley) (PTS No. 341130)	730 Camino del Rio	Mission Valley Development Permit in the form of a Site Development Permit and a Planned Development Permit. The project provides a mix of 291 residential units, 14 shopkeeper units, 5,000 feet of small office space, and 4,000 square feet of retail space.	EIR	Under Construction.
9	Town and Country Hotel Redevelopment (PTS No. 424475)	500 Hotel Circle North	Mixed-use transit oriented development through a Master Plan including three districts: Park District, Residential District,	EIR	Approved.

6.0 CUMULATIVE EFFECTS

Reference No.	Project Name	Location	Description	Environmental Document	Status
			and Hotel District. The hotel would include 700 guest rooms and 177,137 square feet of conference facility space. The Residential District would construct 840 multi-dwelling units and associated parking structure. The Park District would include a 3.31-acre public park.		
10	Lankford Medical Office	1904 Hotel Circle North	92,400 square feet of Medical office space	Project is being amended	In process.
11	Discovery Place (PTS No. 396636)	2401 Camino Del Rio North	A mix of 111 room hotel, 1,500 square feet of fast food restaurant, and 6,000 square feet of commercial/retail uses	Exempt	Approved September 24, 2018.
12	USD Master Plan (Project. No. 417090)	5998 Alcala Park	Addition of 3,000 full-time equivalent people to the USD campus	Supplemental EIR	Approved.
13	Alexan Fashion Valley (PTS No. 474586)	123 Camino de la Reina	Mission Valley Development Permit in the form of a Site Development Permit and a Planned Development Permit. The project provides a mix of 284 residential units (including 48 with a home business focus), 8,150 square feet of commercial office use, and 3,145 square feet of commercial restaurant use.	EIR	Permits issued.
14	Riverwalk (PTS No. 581894)	1150 Fashion Valley Road	An amendment to the existing Levi-Cushman Specific Plan to allow for development of a mixed-use project consisting of 4,300 multi-family residential units, 140,000 square feet of neighborhood retail space, 1,000 square feet of office space and a 12-acre community park.	EIR	In process.
15	Friars Road Mixed Use (PTS No. 585507)	6950, 7020, and 7050 Friars Road	Site Development Permit, Neighborhood Development Permit, and a Planned Development Permit to allow for development of two mixed-use buildings with 313 (243 apartments and 70 condominiums) multi-family units with commercial space on the ground level consisting of 6 commercial shopkeeper units.	MND	Under construction.

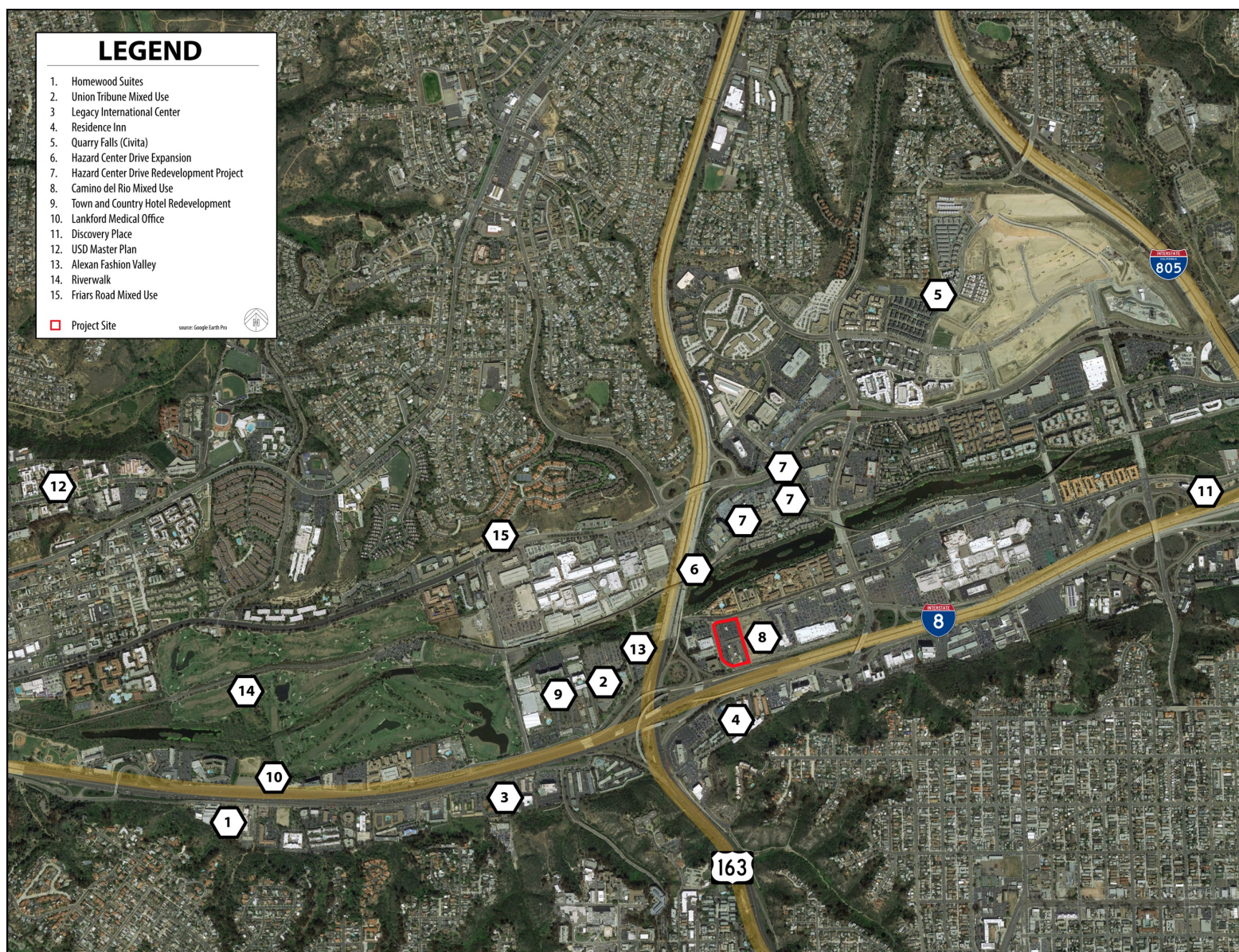


Figure 6-1. General Location of Cumulative Projects

7.0 EFFECTS NOT FOUND TO BE SIGNIFICANT

Section 15128 of the State CEQA Guidelines requires an EIR to contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were, therefore, not discussed in detail in the EIR. Pursuant to Section 15128 of the CEQA Guidelines, the following issue areas were determined not to have the potential to cause adverse effects, and therefore have not been addressed in detail in the EIR.

7.1 Agricultural Resources and Forestry

The project site is currently a developed site consisting of buildings for auto dealership sales, service bays, surface parking lots, and associated improvements. The site does not contain land that is designated as prime agricultural soils by the Soils Conservation Service, nor does it contain prime farmlands designated by the California Department of Conservation. The site is not subject to, nor is it near, a Williamson Act contract site pursuant to Sections 51200-51207 of the California Government Code. The project site and surrounding area are designated as urban and built up land. There is no farmland located in proximity to the project site. Therefore, there would be no impacts associated with agricultural resources.

7.2 Biological Resources

There are no biological resources on the project site, as the project site has been completely developed and does not have the potential for sensitive resources to occur. The project site is not part of a migratory path and does not provide habitat for sensitive species. As such, the project would not have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service.

The project would not conflict with any local policies or ordinances protecting biological resources. The project would not conflict with the provision of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, Multiple Species Conservation Plan, or another approved local, regional, or State habitat conservation plan. The project site is not located within an MSCP area or an area adjacent to the MHPA that would result in edge effects. The project would not introduce invasive species of plants, as the landscape plan includes the use of native, naturalize, and/or drought tolerant material. No invasive or potentially invasive species would be utilized. No impacts to biological resources would occur.

7.3 Geologic Conditions

The following discussion is based on the *Report of Preliminary Geotechnical Investigation* prepared by Christian Wheeler Engineering (July 13, 2017) and included as Appendix H. The project site is a nearly-rectangular parcel of land located at 588 Camino del Rio North, in the Mission Valley community of the City of San Diego, California. The project site is bounded by Camino del Rio North on the south, a mixed-use project currently under construction on the east, Camino de la Reina on the north, and Camino de la Siesta on the west. The site currently houses the Witt Lincoln car dealership and support several buildings, mostly in the southern half, as well as asphalt paved parking lots. Topographically, the site is relatively flat-lying with elevations roughly ranging from 33 to 36 feet above mean sea level (AMSL).

SOIL AND GEOLOGIC CONDITIONS

The project site is located in the Coastal Plains Physiographic Province of San Diego County in relatively close proximity to the San Diego River. Based on the results of subsurface explorations and analysis of readily available pertinent geologic and geotechnical literature, the project site is underlain by human-placed fill material over a relatively thick layer of Quaternary-age alluvium and Tertiary-age sedimentary deposits locally referred to as Stadium Conglomerate.

Artificial Fill (Qaf)

The project site is underlain by artificial fill (Qaf) material. Fill material extends to approximately four feet to five feet below the existing site grades. In general, the fill consists of medium grayish-brown, silty sands and poorly graded sands-silty sands, which are generally moist and medium dense in consistency.

Alluvium (Qal)

Quaternary-age alluvium underlies the fill materials on-site. The alluvium, which is associated with the San Diego River Basin, extends to depths of 64 feet to 82 feet below grade. In general, the alluvium consists of interbedded gray to grayish-brown, silty sands, poorly graded sands, and poorly graded sands-silty with slightly lesser amounts of sandy silts, sandy silts/silty sands and sandy silts/sandy clays. The sandy portions of the alluvium are loose- to medium-dense, while the silty and clayey portions are medium stiff in consistency. Layers of well-graded gravels with cobble were encountered below a depth of about 50 to 60 feet below the existing grades. The alluvial materials are generally moist above the water table and saturated below.

Stadium Conglomerate (Tst)

Tertiary-age sedimentary deposits, locally referred to as the Stadium Conglomerate, occur below the alluvium at approximate depths of 64, 79, and 82 feet. The encountered Stadium Conglomerate consists of greenish-gray, damp, very dense, clayey gravel. From roughly 64 to 73 feet below grade, the encountered material consists of light yellowish-brown, damp, very dense, silty gravel and clayey gravel.

GROUNDWATER

Groundwater occurs at the project site at approximate depths ranging from nine to 13 feet below the existing grade. These depths correspond to approximate elevations between 21 and 25 feet AMSL. Variations in subsurface water (including perched water zones and seepage) may result from fluctuation in the ground surface topography, subsurface stratification, precipitation, irrigation, and other factors that may not have been evident at the time of the investigation. Minor groundwater seepage problems might occur after development of a site even where none were present before development. These are usually minor phenomena and are often the result of an alteration in drainage patterns and/or an increase in irrigation water. These problems can be most effectively corrected on an individual basis, if and when they occur.

TECTONIC SETTING

No faults are known to traverse the project site. However, much of Southern California, including the San Diego County area, is characterized by a series of Quaternary-age fault zones that consist of several individual, en echelon faults that generally strike in a northerly to northwesterly direction. Some of these fault zones (and the individual faults within the zone) are classified as “active” according to the criteria of the California Division of Mines and Geology. Active fault zones are those that have shown conclusive evidence of faulting during the Holocene Epoch (the most recent 11,000 years).

The Division of Mines and Geology used the term “potentially active” on Earthquake Fault Zone maps until 1988 to refer to all Quaternary-age (last 1.6 million years) faults for the purpose of evaluation for possible zonation in accordance with the Alquist-Priolo Earthquake Fault Zoning Act and identified all Quaternary-age faults as “potentially active” except for certain faults that were presumed to be inactive based on direct geologic evidence of inactivity during all of Holocene time or longer. Some faults considered to be “potentially active” would be considered to be “active” but lack specific criteria used by the State Geologist, such as *sufficiently active* and *well-defined*. It is generally accepted that faults showing no movement during the Quaternary period may be considered to be “inactive.” The City of San Diego guidelines indicate that since the beginning of the Pleistocene Epoch which marks the boundary between “potentially active” and “inactive” faults, unfaulted Pleistocene-age deposits are accepted as evidence that a fault may be considered to be “inactive.”

A review of available geologic maps indicates that the active Rose Canyon Fault Zone is located approximately 1.3 miles to the west of the project site. Other active fault zones in the region that could possibly affect the site include the Coronado Bank Fault Zone to the west, the Newport-Inglewood and Palos Verdes Fault Zones to the northwest, and the Elsinore and Earthquake Valley Fault Zones to the northeast.

GEOLOGIC HAZARDS

Seismic Safety Study

The project site is located within Geologic Hazard Category 31 of the City of San Diego Seismic Safety Study. Geologic Hazard Category 31 refers to areas which possess a high potential for soil liquefaction due to such factors as shallow groundwater, location within major drainages, and the presence of hydraulic fills.

Seismic Hazards

A likely geologic hazard to affect the site is ground shaking as a result of movement along one of the major active fault zones mentioned above. Per Chapter 16 of the 2016 CBC, the Risk-Targeted Maximum Considered Earthquake (MCE) ground acceleration is that which results in the largest maximum response to horizontal ground motions with adjustments for a targeted risk of structural collapse equal to one percent in 50 years. Figures 1613.3.1(1) and 1613.3.1(2) of the CBC present MCE accelerations for short (0.2 sec) and long (0.1 sec) periods, respectively, based on a soil Site Class B (CBC Table 1613.3.2) and a structural damping of five percent. For the project site, correlation with the known properties of the underlying bedrock indicates that the upper 100 feet of geologic subgrade can be characterized as Site Class D. In this case, the mapped MCE accelerations are modified using the Site Coefficients presented in CBC Tables 1613.3.3(1) and (2). The modified MCE spectral accelerations are then multiplied by two-thirds in order to obtain the design spectral accelerations.

Per CBC Table 1613.5.2, sites underlain by liquefaction-susceptible soils should be designated as Site Class F, requiring a dynamic site response analysis. However, as discussed in Section 20.3.1 of ASCE Standard 7 “Minimum Design Loads for Buildings and Other Structures”, for structures having fundamental periods of vibration equal to or less than 0.5 second, it is not required to perform a dynamic site response analysis. The proposed structure would have a fundamental period less than 0.5 second and can therefore be designed using soil Site Class D.

Based on a review of published geologic maps and reports, the site is not located on any known active, potentially active, or inactive fault traces. In the event of a major earthquake on the referenced faults or other significant faults in the southern California and northern Baja California area, the site could be subjected to moderate to severe ground shaking. With respect to this hazard, the site is considered comparable to others in the general

vicinity. Additionally, seismic design of the proposed structures would be performed in accordance with guidelines currently adopted by the City of San Diego; and compliance with the California Building Code and other applicable regulatory standards would preclude risks relative to seismic hazards from being significant.

Landslide Potential and Slope Stability

As part of the geotechnical investigation, Christian Wheeler Engineering reviewed the publication, “Landslide Hazards in the Southern Part of the San Diego Metropolitan Area”. This comprehensive study classifies San Diego County into areas of relative landslide susceptibility. The project site is located in Area 1, which is considered to be the least susceptible to slope failures.

Landslides are not present at the property or at a location that could impact the site. Therefore, the risk associated with landslides hazard is low. Additionally, compliance with the California Building Code and other applicable regulatory standards would be required, which would preclude risks relative to landslide potential and slope stability from being significant.

Flooding

As delineated on the FIRM (Panel 1618F) prepared by the FEMA, the project site is located within Zone AE. Zone AE has a one percent annual chance of 100-year flood. The minimum finished floor elevations of buildings proposed for the site would be 40.8 feet, which is two feet above the maximum water surface elevation adjacent to the project site. The majority of the site would be elevated with fill to achieve the proposed minimum finished floor elevations for the buildings. The proposed project would not result in flood hazards to the project site or impose flood hazards on other properties, because the project development would elevate the project site out of the 100-year floodplain. Additionally, compliance with the California Building Code and other applicable regulatory standards would be required, which would preclude risks relative to flooding stability from being significant.

Tsunamis

Tsunamis are great sea waves produced by submarine earthquakes or volcanic eruptions. According to the San Diego County Multi-Jurisdictional Hazard Mitigation Plan, the project site is located outside the limits of the maximum projected tsunami runup. No impacts would result.

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 relatively low.

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 relatively low, due to the project’s distance from large bodies of water. Additionally, compliance with the California Building Code and other applicable regulatory standards would be required, which would preclude risks relative to flooding stability from being significant.

Liquefaction

The project site is in an area considered susceptible to liquefaction. In order to be subject to liquefaction, three conditions must be present: loose sandy or cohesionless silty deposits, shallow groundwater, and earthquake shaking of sufficient magnitude and duration. Based on the site-specific study, shallow groundwater is present at the site and strong earthquake shaking may affect the site. Additionally, as described above, the materials below

the shallow water table in the project consist of Holocene-age alluvial deposits that contain layers of sand, silty sand, and low to medium plasticity silts that are expected to have soil properties conducive to liquefaction. Therefore, the project site could be susceptible to liquefaction.

The liquefaction analysis performed for the project site indicates that much of the saturated sandy and silty portions of the alluvium below the water table possess factors-of-safety against soil liquefaction of less than 1.0 and are therefore considered liquefiable. Post-liquefaction reconsolidation settlement analysis found that without any deep ground modification procedures, the project area may be assumed to be subject to approximately four inches of liquefaction-induced, differential settlement. Stone columns may be necessary to ensure that the estimated settlement due to liquefaction is two inches or less. Remedial grading for areas to support new fill and/or settlement-sensitive improvements would be performed to the satisfaction of the City Engineer. This may include overexcavating the existing soils to depths about of about five feet below the existing grade and replacing the material as properly compacted, structural fill. Implementation of standard building practices would avoid risks associated with liquefaction.

Lateral ground spreading can occur when viscous liquefied soils flow downslope, usually towards a river channel or shoreline. Such factors as the gently sloping nature of the site and surrounding areas and the relatively gentle hydraulic gradient of the water table across the areas are considered favorable with regards to limiting potential lateral spreading. Impacts relative to lateral spreading would be less than significant.

7.4 Hydrology

SURFACE WATER

The project site is located within the lower San Diego subunit of the San Diego Hydraulic Unit, Lower San Diego Hydrologic Area, Mission San Diego Hydrologic Subarea, Basin Number 907.11, as identified in the *Water Quality Control Plan for the San Diego Basin*. The main receiving water body in this Hydrologic Subarea is the San Diego River. The San Diego Hydraulic Unit drains an approximately 440-square-mile area and discharges the combined drainages of the Alvarado Canyon, San Vicente Creek, and Foster Creek through the San Diego River into the Pacific Ocean. The drainage area extends easterly to Lake Cuyamaca and westerly to Mission Bay. Average annual precipitation ranges from approximately 9.9 inches along the coast and in excess of 40 inches in the inland mountains. According to the most recent Flood Insurance Rate Maps, the project site is located inside the 100-year floodplain.

DRAINAGE

The project is within the drainage basin for an existing 18-inch storm drain located in Camino del Rio North (South Basin) and an existing 18-inch storm drain located in Camino de la Reina (North Basin).

The South Basin is upstream from the point of connection with the existing 18-inch storm drain in Camino del Rio North, consists of three sub-basin: Sub-Area 4 (Commercial Development), Sub-Area 5 (Multi-Family Development), and Sub-Area 6 (Camino del Rio North, impervious). It is assumed that each of the aforementioned basin types have the following run-off coefficients: Sub-Area 4: 0.85, Sub-Area 5: 0.70, and Sub-Area 6: 0.90. The time of concentration and intensity factor were derived from the *City of San Diego Drainage Manual - January 2017 Edition* and have been estimated to be time of concentration factor (T_c) = eight minutes. The estimated runoff produced from a 50-year storm event in the South Basin has been calculated to be 9.8 cubic feet per second

7.0 EFFECTS NOT FOUND TO BE SIGNIFICANT

(cfs). The estimated runoff from a 50-year storm event exceeds the capacity of the existing 18-inch storm drain (8.7 cfs). The estimated runoff produced from a 100-year storm event has been calculated to be 10.6 cfs. The estimated runoff from a 100-year storm event exceeds the capacity of the existing 18-inch storm drain (8.7 cfs).

The North Basin upstream from the point of connection with the existing 18-inch storm drain in Camino de la Reina consists of three sub-basins: Sub-Area 1 (Commercial Development), Sub-Area 2 (Camino de la Reina, impervious), and Sub-Area 3 (Multi-Family Development). It is assumed that each of the aforementioned basin types have the following run-off coefficients: Sub-Area 1: 0.85, Sub-Area 2: 0.90, and Sub-Area 3: 0.70. The time of concentration and intensity factor was derived from the *City of San Diego Drainage Manual - January 2017 Edition* and has been estimated to be T_c = nine minutes. The estimated runoff produced by a 50-year storm event for the North Basin has been calculated to be 11.0 cfs. The maximum capacity of the 18-inch storm drain is 13.1 cfs. The existing 18-inch storm drain has sufficient capacity to carry the flow generated by a 50-year storm event. The estimated runoff produced from a 100-year storm event has been calculated to be 11.6 cfs. The existing 18-inch storm drain has sufficient capacity (13.1 cfs) to carry the flow generated by a 100-year storm event.

GROUNDWATER

As discussed in Section 7.3, *Geologic Conditions*, groundwater was encountered within exploratory borings at approximate depths ranging from nine to 13 feet below the existing grade. These depths correspond to approximate elevations between 21 and 25 feet AMSL. The project site is developed and nearly covered with impervious surfaces (surface parking and buildings). The project would introduce new area of pervious surfaces as a result of extensive landscaping. Therefore, the project would not result in an increase in impervious surfaces.

The proposed South Basin Sub-Areas 7, 8, 9, and 10 all have run-off coefficients of 0.70 for Residential Multi-Units and Sub-Area 11 has a run-off coefficient of 0.90 for Camino del Rio North, impervious, per the City of San Diego Drainage Manual. Time of concentration has been estimated at T_c = seven minutes. Under the proposed condition, the South Basin estimated runoff produced from a 50-year storm event has been calculated to be 8.2 cfs. The maximum capacity of the existing 18" storm drain is 8.7 cfs. The existing storm drain has sufficient capacity to carry the flow generated by a 50-year storm event. The estimated runoff produced from a 100-year storm event has been calculated to be 8.6 cfs. The existing 18-inch storm drain has sufficient capacity (8.7 cfs) to carry the flow generated by a 100-year storm event.

The proposed North Basin Sub-Areas 1, 2, 3, 5, and 6 all have run-off coefficients of 0.70 for Residential Multi-Units and Sub-Area 4 has run-off coefficient of 0.90 for Camino de la Reina, impervious, per the City of San Diego Drainage Manual. Time of concentration calculation is estimated at T_c = nine minutes. Under the proposed conditions, the North Basin estimated runoff produced from a 50-year storm event has been calculated to be 10.5 cfs. The maximum capacity of the existing 18" storm drain is 13.1 cfs. The existing storm drain has sufficient capacity to carry the flow generated by a 50-year storm event. The estimated runoff produced from a 100-year storm event has been calculated to be 11.1 cfs. The existing 18-inch storm drain has sufficient capacity (13.1 cfs) to carry the flow generated by a 100-year storm event.

The proposed runoff for the 50-year and 100-year storm event is less than the capacity of the downstream storm drain, and less than the existing runoff rates and therefore, would not have an impact on the existing downstream drainage. The project reduces the amount of runoff draining to the existing downstream facilities for the North and South Basins.

The project site is located within the 100-year floodplain. The project site is within the Special Flood Hazard Area (SFHA) Zone AE of the San Diego River based on FEMA's FIRM Panel No. 06073C1618G, dated May 16, 2012. Additionally, a Condition Letter of Map Revision based on Fill (CLOMR-F) (included in Appendix M) has been submitted to the FEMA to demonstrate that the project would not be inundated by the base flood. Following construction at the site, an application for a Letter of Map Revision based on Fill (LOMR-F) would be prepared and submitted to FEMA. Because the site is disconnected from the main channel of the San Diego River, placement of fill at the project site would not result in an increase to the base flood elevation (BFE) for the San Diego River.

7.5 Mineral Resources

The project site is the location of an approved urban development. The site is not designated as a mineral resource area. The project would not result in the loss of availability of any mineral resources that would be of value to the region. Therefore, there would be no significant impact on mineral resources with the implementation of the project.

7.6 Paleontological Resources

Paleontological resources, or fossils, are the remains and/or traces of prehistoric plant and animal life. Fossils provide direct evidence of ancient organisms and document the patterns of organic evolution and extinction that have characterized the history of life. Fossil remains, such as bones, teeth, shells, and wood, are found in the geologic deposits (sedimentary rock formations) within which they were originally buried in deep bedrock layers of sandstone, mudstone, or shale. Paleontological resources contain not only the actual fossil remains, but also the localities where those fossils are collected and the geologic formations containing the localities.

The potential for fossil remains at a location can be predicted through previous correlations that have been established between the fossil occurrence and the geologic formations within which they are buried. For this reason, knowledge of the geology of a particular area and the paleontological resource sensitivity of particular rock formations make it possible to predict where fossils will or will not be encountered.

Paleontological resource sensitivity is typically rated from high to zero depending upon the impacted formations. The sensitivity of the paleontological resource determines the significance of a paleontological impact.

As described in Section 7.3 *Geologic Conditions*, the project area is underlain by artificial fill, alluvium, and Stadium Conglomerate. The sensitivity for each of these geologic formations that may contain important paleontological resources is described above under 7.3, *Geologic Conditions*.

The project would result in approximately 100 cubic yards of cut and 29,000 cubic yards of fill. The maximum depth of cut would be eight feet and the maximum fill depth would be two feet. According to the *Significance Determination Thresholds*, implementation of a project would have the potential to significantly impact paleontological resources if grading of geologic formations that occur in a high resource potential geologic deposit/formation/rock unit – such as Stadium Conglomerate that underlies most of the project site – exceeds 1,000 cubic yards at a depth of 10 feet or more. However, the project does not exceed 1,000 cubic yards of excavation at a depth of 10 feet or more in a high resource potential geologic formation. Stadium Conglomerate occurs at depths of 64 to 82 feet; the project proposes a maximum depth of cut of eight feet.

Paleontological monitoring during grading activities may be required if it is determined that the project's earth movement quantity exceeds the paleontological threshold (if greater than 1,000 cubic yards and 10 feet deep for formations with a high sensitivity rating and if greater than 2,000 cubic yards and 10 feet deep for formations with a moderate sensitivity rating). Monitoring may also be required for shallow grading (less than 10 feet) when a site has been previously graded and/or unweathered formations are present at the surface.

Based on the proposed grading, only Artificial Fill and Alluvium would be impacted, as the maximum depth of grading would be eight feet. Stadium Conglomerate occurs at depths of 64 to 82 feet. Therefore, the project does not have the potential to disturb or destroy paleontological resources.

7.7 Water Quality

Water quality is affected by sedimentation caused by erosion, by runoff carrying contaminants, and by direct discharge of pollutants. The increase in impervious surfaces generally associated with the development of land leads to increased opportunity for contaminated runoff that carries oils, heavy metals, pesticides, fertilizers, and other contaminants to enter a watershed.

The project site is situated within the San Diego Hydrologic Unit (No. 907.00), Lower San Diego Hydrologic Area (No. 907.10), and Mission San Diego Hydrologic Subarea (HSA) (No. 907.11) per the Water Quality Control Plan for the San Diego Basin, San Diego Regional Water Quality Control Board, September 1994. Storm water generated on-site is discharged to the San Diego River via hardened conveyance. Basin No. 907.11 is included in the most recent list of Clean Water Act Section 303(d) List of Water Quality Segments. The project site indirectly discharges to the San Diego River (Lower), which is impaired with enterococcus, fecal coliform, low dissolved oxygen, manganese, nitrogen, phosphorous, total dissolved solids, and toxicity.

The project has the potential to affect water quality at the project site. Runoff from the project would eventually enter the Lower San Diego River, an identified impaired water body. The following categories of anticipated or potential pollutants have been identified as "pollutants of concern" based on a "residential" and "parking lots" proposed site use:

- Sediments
- Nutrients
- Heavy metals
- Trash and debris
- Oxygen demanding substances
- Oil and grease
- Bacteria and viruses (potential)
- Pesticides

The project would provide appropriate BMPs as required by the City's Storm Water Standards during construction and post-construction. These requirements have been reviewed and verified by qualified staff and would be reverified during the ministerial process. Adherence to the standards would preclude considerable contribution to water quality. Impacts would be less than significant.

7.0 EFFECTS NOT FOUND TO BE SIGNIFICANT

To address water quality for the project, BMPs would be implemented during construction and post-construction activities. BMPs to control these general pollutants are described under *Issue 2*, below. Implementation of BMPs would treat storm water to meet City water quality objectives and avoid significant impacts.

Property modifications associated with the project are not expected to substantially affect the quality of storm water runoff leaving this site compared to existing conditions, because the project would implement BMPs to minimize the impacts of post-construction activities on the quality and quantity of storm water to the maximum extent practicable. In addition, BMPs would be implemented to control the construction sources of potential storm water pollutants. Additionally, the project would result in less runoff than what currently exists and would eliminate expanses of open parking areas that generate pollutants, therefore improving site conditions with implementation of the BMPs.

The project is not expected to affect the quality of storm water runoff leaving the site in the near- or long-term. The project would implement BMPs directed at precluding impacts to local and regional water quality.

8.0 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

As required by Section 15126.2(c) of the CEQA Guidelines, the significant irreversible environmental changes of a project shall be identified. Irreversible commitments of non-renewable resources are evaluated to assure that their use is justified. Irreversible environmental changes typically fall into three categories: primary impacts, such as the use of nonrenewable resources; secondary impacts, such as highway improvements which provide access to previously inaccessible areas; and environmental accidents associated with a project.

Development would occur as a result of the project that would entail the commitment of energy and natural resources. The primary energy source would be fossil fuels, representing an irreversible commitment of this resource. Construction of the project would also require the use of various raw materials, including cement, concrete, lumber, steel, etc. These resources would also be irreversibly committed.

Once constructed, use of the project would entail a further commitment of energy and non-renewable resources in the form of electric energy derived from fossil fuels, natural gas, construction materials (i.e., concrete, asphalt, sand and gravel, petrochemicals, steel, and lumber and forest products), potable water, and labor during the construction phases. The project features a number of sustainability elements to minimize its consumption of energy and non-renewable resources, as described in Section 5.6, *Energy*, and in Chapter 3.0, *Project Description*, and associated impacts would be less than significant. Nevertheless, use of these resources on any level would have an incremental effect on the regional consumption of these commodities, and therefore result in long-term irreversible losses of non-renewable resources such as fuel. This commitment would be a long-term obligation since the proposed structures are likely to have a useful life of 20 to 30 years or more. As presented in Section 5.6, *Energy*, the project would increase demand for energy in the project area and SDG&E's service area. However, no adverse effects on non-renewable resources are anticipated. The project would follow UBC, LEED Silver for Homes, and Title 24 requirements for energy efficiency and would incorporate sustainable design features directed at reducing energy consumption, including utilizing photovoltaic panels to provide solar power on-site. Solar power would be provided to offset project energy use by the amounts required for the Sustainable Buildings Expedite Program (50 percent offset for residential uses and 30 percent offset for commercial uses). These offsets account for 47 percent of overall energy use on-site. The impact of increased energy usage is not considered a significant adverse environmental impact.

The project would not involve road or highway improvements that would provide access to previously inaccessible areas. Further, no major environmental accidents or hazards are anticipated to occur as a result of project implementation, as discussed in Section 5.10, *Health and Safety*.

9.0 GROWTH INDUCEMENT

Growth inducement is usually associated with projects that foster economic or population growth, or construct additional housing, which either directly or indirectly results in the construction of new infrastructure facilities. According to Section 15126.2(d) of the CEQA Guidelines, “it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

The project site is located within the Mission Valley Community Plan area and is designated for commercial retail uses. The project does not require a land use change, as the Mission Valley Community Plan allows for multi-use development in commercial zones. Although the project proposes new entitlements, the project results in the redevelopment of a site that is already developed and served by existing infrastructure. Growth inducing impacts would not occur, as analyzed below.

Relative to growth inducement and based on the *CEQA Significance Determination Thresholds* (July 2016), the EIR must analyze the consequences of growth. According to Section 15126.2 (d) of the CEQA Guidelines, “It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.” In general, the analysis must avoid speculation and focus on probable growth patterns or projections. Conclusions must also be presented that determine whether this impact is significant and/or unavoidable, and provide for mitigation or avoidance, as necessary.

The project is an in-fill redevelopment providing a mix of uses located within the existing circulation network and infrastructure on previously developed land. Due to the in-fill redevelopment nature of the project, the project would not foster population growth, either directly or indirectly, as the project is accommodating the population that currently exists and would not open up a new area of land for population growth.

Future residents living in the project may stimulate economic growth in the area by purchasing goods and services from the new and existing retail/commercial businesses in the vicinity. The area surrounding the site already has an extensive number of supporting retail and services to accommodate population growth at the project site. Rather than creating or inducing new growth, the project serves to direct the location and type of development based on land use planning concepts that promote a sustainable development easily accessible to transit and surrounding services. The project, therefore, would accommodate anticipated population growth in Mission Valley.

The project would not remove an obstacle to growth or expand public services and facilities to accommodate additional economic or population growth beyond that proposed for the site. Roadways already exist to serve the project and no improvements would be needed as a result of the project. Additionally, the project site is fully served by public infrastructure and does not propose to extend new infrastructure or increase the capacity of public services, such as water or sewer, in excess of what is necessary to adequately serve the project site. Although the project includes some improvements to existing utilities within the site, these improvements would serve only the project and would not extend off-site. Additionally, surrounding areas are generally developed with existing urban uses and the overall area is currently served by public infrastructure. The project would not result in a substantial alteration to the planned location, distribution, density, or growth rate of the Mission Valley community, adjacent communities, or the City as a whole. The project would not result in significant impacts associated with growth inducement. Mitigation would not be required.

10.0 ALTERNATIVES

In accordance with Section 15126.6(a) of the CEQA Guidelines, an 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.*" Thus, 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 Section 15126.6(f)(1) of the State CEQA Guidelines, 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.

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 Section 3.0, *Project Description*, and are re-printed below for reference:

- Create a coherent and cohesive building site and site design that is compatible in scale and character of surrounding and planned developments and enhances the existing community character in the Mission Valley community.
- Implement a project that is sustainable based on the USGBC LEED for Homes Silver certification standards to reduce the project's overall carbon footprint, water and energy use, and generation of greenhouse gas emissions.
- In keeping with the City of Villages Strategy and Smart Growth policies, provide for a mix of commercial retail, commercial office, and residential (including shopkeepers units) uses as in-fill development of an underutilized site within an urban area where public facilities, transit, and services are readily available and easily accessed via alternative modes of travel, including mass transit, and active transportation.
- Maximize efficiency in use of the project site.
- Enhance this portion of the Mission Valley community by contributing to a "Main Street" feel along Camino de la Reina, with buildings that address the street and open pedestrian areas that front on Camino de la Reina.
- Create additional retail and job opportunities in the Mission Valley community.
- Utilize architecture and design elements to ensure high quality design and aesthetics.

- Provide retail amenities for the adjacent employment and residential uses that are not only within walking distance but also capture drive-by automobile trips and walk-up trips from adjacent properties, thereby reducing the amount of routine daily trips.
- Redevelop the project site to cluster high-density housing opportunities in the Mission Valley community where transit and other amenities are readily available.
- Provide common space that the public can access in the form of a pedestrian plaza.

Based on the analysis contained in Section 5.0, the project would result in the potential for significant impacts to transportation/circulation (cumulative street segment impact), historical resources (unknown subsurface archaeological resources), and tribal cultural resources. Mitigation measures have been identified that would reduce all impacts to below a level of significance.

In accordance with Section 15126.6(c) of the State CEQA Guidelines, 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 and rejected are also identified.

10.1 Alternatives Considered But Rejected

10.1.1 *Alternative Location Alternative*

Mission Valley is essentially a built-out community. With the exception of the SDCCU Stadium site, the last remaining undeveloped properties are either being developed (such as Quarry Falls/Civita, which is currently being constructed as a large, master planned neighborhood with a mix of residential, commercial retail, office, and park uses) or are planned for development under approved Specific Plans (such as the Riverwalk/Levi-Cushman Specific Plan). There are number of smaller sites in the Mission Valley community where redevelopment could occur in a manner similar to the project. Like the project site, some of these sites have easy access to transit. Several of these sites are already considered for redevelopment/development by other owners/applicants, as presented in Section 6.0, *Cumulative Effects*. There are no other sites under the applicant's control to allow development of a mixed-use project that meets the project's objectives. Additionally, other sites within Mission Valley may not have the correct zoning and land use designation to allow development of a mixed use project and would, therefore, require a rezone and/or amendment to the Mission Valley Community Plan and City of San Diego General Plan.

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." If the project were developed on an alternative site in the community or other areas of the City or County, significant environmental impacts could result that would not occur with the proposed development of the project site. There are no native habitats or known wildlife resources located on the project site. Other sites may contain significant sensitive resources and development on another site could result in significant biological impacts, which would not occur at the project site. Thus, impacts to biological resources would be avoided with the project. The site has easy access to public streets and freeways and is already served by existing public facilities, services, and utilities. A similar level of intensity as the project constructed at another site could potentially have increased levels of impacts relative to air quality, traffic, and

GHG emissions, as another site may not have the same or similar developed characteristics, walkability, and multi-modal transportation opportunities.

For these reasons, there are no other alternative locations for the project that would meet the project's objectives. Therefore, the Alternative Location Alternative was rejected from further analysis.

10.1.2 PDO Multiple Use Zone Consistency Alternative

An alternative was considered that would develop the project site as a similar mixed-use development project that maximizes development intensity in accordance with the Multiple Use (MV-M) zone in the Mission Valley PDO. The PDO Multiple Use Zone Consistency alternative would include physically and functionally integrated commercial office, commercial retail, and multi-family residential uses.

Under the MV-M zone in the Mission Valley PDO Guideline, no single land use should account for more than 60 percent, nor less than 20 percent, of the ADT allocated to the project, based on the trip generation rates included in the PDO (Table 1514-03B, *Development Intensity Factors of the Mission Valley PDO*) and the Threshold 2 Development Intensity District calculation. Additionally, the predominant land use should be consistent with the Community Plan land use designation (i.e., Commercial Retail for the Witt Mission Valley project site). For the project, the project site is within Development Intensity District G, which allows for a maximum of 344 trips per acre or 1,765 ADT for the 5.13-acre project site.

The PDO Multiple Use Zone Consistency Alternative would allow no more than 60 percent commercial retail, no less than 20 percent residential, and no less than 20 percent commercial office. Under this alternative, the residential unit count would be reduced from 277 units proposed by the project to 57 units. The commercial office and commercial retail components would be increased to approximately 20,650 square feet of commercial retail use and 21,500 square feet of commercial office use under this alternative. (See Table 10-1, *Proposed Project PDO Trip Generation Compared with the PDO Multiple Use Zone Consistency Alternative Trip Generation*.) The alternative could include some of the same features as the project, such as the street landscape features and a retail plaza. However, due to the reduced number of residential units, this alternative would not support the type and amount of residential amenities proposed by the project nor would it include shopkeepers units.

When compared to the project, as shown in Table 10-1, *PDO Multiple Use Zone Consistency Alternative Trip Generation*, this alternative would result in an increase of 22 ADT compared to what would be generated by the project using the Mission Valley PDO trip generation rates. Thus, this alternative would result in increased traffic impacts when compared to the project. Additionally, there would be an increase in air quality and noise impacts, as those are related to the amount of traffic generated by a project. Relative to other environmental issues areas determined to be potentially significant in this EIR [i.e., historical resources (unknown subsurface archaeological resources), and tribal cultural resources (unknown subsurface archaeological resources)], impacts would be the same as the project, as those impacts are associated with any redevelopment of the project site.

Table 10-1. Proposed Project PDO Trip Generation Compared with the PDO Multiple Use Zone Consistency Alternative Trip Generation

Proposed Project Traffic Generation
Based on the Trip Generation Rates from the Mission Valley Planned District Ordinance

Land Use	Intensity	Rate	ADT
Commercial Retail	6,000 square feet	60 trips / 1,000 sq. ft.	360
Multiple Family Units	277 dwelling units	6 per unit	1,662
Commercial Office	3,600 square feet	20 trips / 1,000 sq. ft.	72
SUBTOTAL			2,094
Less Mixed-Use Credit (17% of total ADT)			- 356
TOTAL			1,738

PDO Multiple Use Zone Consistency Alternative Traffic Generation
Based on the Trip Generation Rates from the Mission Valley Planned District Ordinance

Land Use	Intensity	Rate	ADT
Commercial Retail	20,650 square feet	60 trips / 1,000 sq. ft.	1,239
Multiple Family Units	57 dwelling units	8 per unit	456
Commercial Office	21,500 square feet	20 trips / 1,000 sq. ft.	430
SUBTOTAL			2,125
Less Mixed-Use Credit (17% of total ADT)			- 363
TOTAL			1,762

This alternative could meet some of the project objectives, such as creating a coherent and cohesive building site and site design that is compatible in scale and character of surrounding and planned developments and enhances the existing community character in the Mission Valley community and providing a mix of commercial retail, and residential uses as in-fill development of an underutilized site. This alternative would create additional retail and job opportunities in the Mission Valley community and would provide retail amenities for the adjacent employment and residential uses that are within walking distance. However, this alternative does not substantially reduce any environmental impacts. This alternative would not avoid or minimize impacts associated with potential subsurface archaeological and tribal cultural resources and would result in a slight increase in traffic, air quality, and noise impacts. This alternative would also not meet the primary objectives of the project relative to maximizing efficient use of the project site and one that provides a transit-oriented, pedestrian-focused development that locates high density residential uses in proximity to transit in a manner that implements the City of Villages and Smart Growth principles.

The PDO Multiple Use Zone Consistency would not meet all of the project objectives. Furthermore, due to the drastic reduction in residential units (from 277 under the project to 57 under this alternative), this alternative would not provide for much-needed housing in a wide variety of unit types. Therefore, the PDO Multiple Use Zone Consistency alternative was rejected from further analysis.

10.2 Alternatives Considered

Alternatives to the project are considered and discussed in this section. These include the “No Project” alternative that is mandated by CEQA and an alternative that was developed in the course of project planning and environmental review for the project. Specifically, the following project alternatives are addressed in this EIR:

- Alternative 1: No Project/No Build Alternative
- Alternative 2: Reduced Density Alternative
- Alternative 3: All Commercial Development Alternative

Relative to the requirement to address a “No Project” alternative, CEQA Guidelines Section 15126.6(e) states that:

When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the “no project” alternative will be the continuation of the existing plan, policy or operation into the future.

If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the “no project” alternative is the circumstance under which the project does not proceed.

For the project, the No Project/No Build Alternative would result in no redevelopment of the project site. In other words, if the project does not go forward, the existing development as described in Section 2.3, *Existing Site Conditions*, would remain.

10.3 Alternatives Analysis

The impacts of each alternative are analyzed in this section. The review of alternatives includes an evaluation to determine if any specific environmental characteristic would have an effect that is “*substantially less*” than the project. A significant effect is defined in Section 15382 of the CEQA Guidelines as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project.” As analyzed in Section 5.0, *Environmental Analysis*, the project could result in potentially significant direct impacts associated with historical resources (unknown subsurface archaeological resources), and tribal cultural resources (unknown subsurface archaeological resources), and cumulative impacts associated with transportation/circulation.

10.3.1 Alternative 1 – No Project/No Build Alternative

CEQA Guidelines Section 15126.6(e) requires that an EIR evaluate a “No Project” alternative along with its impacts. The purpose of describing and analyzing a “No Project” alternative is to allow a lead agency to compare the impacts of approving the project to the impacts of not approving it. Specifically, Section 15126.6(e)(3)(B) of CEQA requires that an EIR for a development project on an identifiable property address the “No Project” alternative as “circumstances under which the project does not proceed.” In other words, the no project assumes that the project site would not be developed with the project.

Under the No Project/No Build Alternative, the project would not be implemented on the site. The automotive dealership sales and offices, service bays, and exterior auto sales areas would not be demolished and would be left as they are today. Auto dealership and service uses would continue as they do today.

Environmental Analysis

Land Use. As presented in Section 5.1, *Land Use*, the project would be consistent with all applicable goals, policies, and objectives of the General Plan. As presented in Section 5.7, *Noise*, the project would result in interior noise levels in excess of the City’s Noise Compatibility Guidelines requirements. However, project design features, including windows with STC ratings higher than those provided by standard building construction and air conditioning, would be implemented as part of the project. Additionally, interior noise levels would be attenuated in accordance with Title 24, bringing the project into conformance with the General Plan’s Noise Compatibility Guidelines.

The project would be consistent with the Mission Valley Community Plan’s objectives, proposals, and development guidelines, with the exception of a solar access development guideline within the Design Element (i.e. locating the

majority of the project's glass areas on the south elevation). The project would be consistent with the regulations of the MVPDO except for the sidewalk width requirements on Camino de la Reina, Camino del Rio North, and Camino de la Siesta and the parkway width requirements on Camino de la Reina. The project proposes a deviation from these requirements to allow for development that addresses the street and allows for pedestrian-scale project features. The reduced sidewalk and parkway widths would not affect pedestrian access as adequate sidewalk space would be provided for pedestrians therefore, a significant impact would not result.

Under the No Project/No Build Alternative, the existing uses on-site would remain. Significant environmental effects associated with land use would not occur under the No Project/No Build Alternative, as the existing development is consistent with the General Plan, Community Plan, and MVPDO; no deviations would be required under this alternative. The No Project/No Build Alternative would avoid the need for noise attenuation design features that are associated with the project. However, current noise levels from the on-site buildings and auto dealership and service uses would continue.

Transportation/Circulation. As presented in Section 5.2, *Transportation/ Circulation*, the project would generate 581 new ADT, with 84 additional AM peak hour trips and 62 additional PM peak hour trips. The project would result in one significant Horizon Year (2035) cumulative impact on Camino del Rio North from Camino de la Siesta to Camino del Arroyo. Measures would be required that mitigate cumulative traffic impacts to below a level of significance.

The No Project/No Build Alternative would not result in new impacts associated with traffic circulation. All street segments and intersections function at acceptable levels with the existing conditions. Sufficient parking is provided for the current uses; therefore, like the project, this alternative would also not result in parking impacts or parking congestion in the community. No new traffic improvements or pedestrian improvements would occur under this alternative.

Visual Effects and Neighborhood Character. As concluded in Section 5.3, *Visual Effects and Neighborhood Character*, the project's impact on the visual character and quality of the surrounding environment is considered less than significant. The project would not result in a substantial degradation of the existing visual character or quality of the site or its surroundings. The project would not result in bulk, scale, materials, or style that are incompatible with surrounding development; and the project would not result in significant lighting and glare impacts.

Under the No Project/No Build Alternative, the existing development would remain as it does today. The current development on-site consists of 38,070 square feet of commercial buildings and on-site surface parking with a chain link fence and barbed wire surrounding the majority of the property. Landscaping is minimal and confined mostly to the perimeter of the site. As redevelopment occurs toward a mixed-use urban village, the existing development is less compatible visually and from a neighborhood character perspective than what is proposed by the project. Although greater than the project, the impacts from the existing use do not represent a significant visual quality or neighborhood character impact. The project would result in an improvement in visual quality and neighborhood compatibility with the retail developments to the east and residential developments to the north. When compared to the project, this alternative would be considered to have negative aesthetic and neighborhood character effects that would not occur with the project.

Air Quality. As presented in Section 5.4, *Air Quality*, the project is consistent with applicable air quality control plans, including the RAQS, the SIP, and SANDAG's Transportation Control Measures. Operational emissions would

be below the significance thresholds for all pollutants. Additionally, CO impacts would be less than significant because no CO “hot spots” would result from the project. Construction impacts would be temporary and for a short duration. Therefore, air quality impacts associated with project operations and construction would not be significant.

The No Project/No Build Alternative would not result in any changes to the existing site conditions. No development, construction, or grading would occur under the No Project/No Build Alternative. Therefore, the No Project/No Build Alternative would not have the potential to cause any increase in air emissions that would result during construction and operation of the project. Although such impacts would not be significant under the project, the No Project/No Build Alternative would result in fewer environmental effects associated with air quality because less vehicular emissions would be generated under this alternative and no new construction would occur.

Greenhouse Gas Emissions. As presented in Section 5.5, *Greenhouse Gas Emissions*, the project would not conflict with the CAP or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases. The project would not result in a significant impact relative to plans, policies, or regulations aimed at reducing GHG emissions. Project impacts associated with GHG emissions would, therefore, be less than significant.

The No Project/No Build Alternative would not generate GHG emissions as a result of construction, because no new construction would occur. The No Project/No Build Alternative would result in the generation of greenhouse gas emissions associated with operations and vehicle trips. Less GHG emissions would be generated by the No Project/No Build Alternative than the project due to less traffic associated with this alternative, as well as lower development intensity. Therefore, impacts associated with greenhouse gas emissions would be less under this alternative than those associated with the project. However, neither the project nor this alternative would result in significant impacts associated with greenhouse gas emissions.

Energy. As presented in Section 5.6, *Energy*, the project would increase demand for energy in the project area and SDG&E’s service area. However, no adverse effects on non-renewable resources are anticipated. The project would follow UBC and Title 24 requirements for energy efficiency, USGBC LEED for Homes Silver Certification standards, and would be consistent with the CAP by incorporating sustainable design features directed at reducing energy consumption.

Under the No Project/No Build Alternative, energy consumption would remain as it is today. Existing development on the project site was constructed prior to energy conserving measures that are currently available. As such, modern energy conserving measures have not been implemented to the extent that would be required for and augmented by the project. However, development on the project site is relatively low in intensity and energy use. Similar to the project, impacts relative to energy would not be significant under the No Project/No Build Alternative.

Noise. As presented in Section 5.7, *Noise*, the project would not generate significant noise levels affecting ambient off-site noise levels. Furthermore, the project would not generate noise that, when added to noise generated by other projects would be regarded as significant.

Under the No Project/No Build Alternative, no noise impacts would result. Existing uses are compatible with the surrounding noise environment, and existing uses would not generate noise levels that exceed City standards. Because no new construction or grading would occur with the No Project/No Build Alternative, noise associated

with these activities would be avoided, although such impacts would not be significant under the project. Although neither this alternative nor the project would result in significant noise impacts, noise impacts associated with this alternative would be considered less than what would occur with the project because no demolition and construction would occur.

Historical Resources. As presented in Section 5.8, *Historical Resources*, the project would involve the demolition of the existing structures on the site. Structures on the property were constructed in 1966 and therefore could be more than 45 years old. However, the property does not meet local criteria as an individually significant resource under the adopted Historic Resource Boards Criteria. Therefore, no potentially significant structures are present on the property and the project would not adversely affect an historic resource. Although no historical resources were identified within the boundaries of the project site, recorded sites have been identified within proximity to the project site. Due to the sensitivity of the area, potentially significant impacts to unknown subsurface archeological resources could result during ground-disturbing activities. In order to mitigate potential impacts to unknown subsurface archaeological resources, archaeological monitoring would be required in areas of the project site not impacted by the construction of the existing building, such as the landscaped areas and parking lots surrounding the existing building.

The No Project/No Build Alternative does not have the potential to impact cultural resources, as no new development would occur. Therefore, when compared to the project, this alternative would result in no impacts and would not require mitigation measures.

Tribal Cultural Resources. As concluded in Section 5.9, *Tribal Cultural Resources*, no tribal cultural resources were identified within the boundaries of the project site. Due to the sensitivity of the area, potentially significant impacts to unknown subsurface archeological resources could result during ground-disturbing activities. In order to mitigate potential impacts to unknown subsurface archaeological resources, archaeological monitoring would be required.

The No Project/No Build Alternative does not have the potential to impact cultural resources, as no new development would occur. Therefore, when compared to the project, this alternative would not result in impacts and, therefore, would not require mitigation measures.

Health and Safety. As presented in Section 5.10, *Health and Safety*, the project would be designed in accordance with applicable safety standards and would not impair implementation of, or physically interfere with, emergency response plans or emergency evacuation plans. The project site is not listed as a hazardous materials site; two LUST clean up sites that have been closed were identified on the project site. According to the Phase I Environmental Site Assessment conducted for the project, existing buildings may contain asbestos and lead. Industry standards in place would insure no risk to workers by hazardous materials during demolition and construction. Although the project site is within the AIAs of San Diego International Airport and Montgomery Field, the project would not result in impacts associated with the respective ALUCPs. As a result, the project would not result in impacts associated with health and safety.

The No Project/No Build Alternative would not result in any changes to the existing site conditions. Current uses on-site are consistent with the ALUCPs for San Diego International Airport and Montgomery Field. Additionally, there are no current health risks relative to surrounding hazardous materials handlers. Like the project, this alternative would not result in any significant impacts relative to health and safety. Therefore, the No Project/No Build Alternative would result in the same level of non-impact to health and safety as the project.

Public Services and Facilities. As presented in Section 5.11, *Public Services and Facilities*, the project site is currently developed with existing structures and on-site surface parking. Existing development is served by public service facilities, such as fire/life safety protection and police protection. The project would not result in significant impacts to police protection, fire/life safety protection, libraries, parks or other recreation facilities, and schools.

The No Project/No Build Alternative would have a similar demand on public services for police protection and fire and safety as the project. This alternative would not generate school-aged children and would not create a resident population that would use school, library, or recreational services. Because no new development would occur under the No Project/No Build Alternative that could result in an increase in population, impacts on public services and facilities would be less under the No Project/No Build Alternative. However, the project would likewise not result in significant impacts to public services and facilities.

Public Utilities. As concluded in Section 5.12, *Public Utilities*, the project would not result in significant impacts to water, sewer, solid waste, and communications systems. The No Project/No Build Alternative would not result in any changes to the existing site conditions. Currently, the project site is developed with existing structures and on-site surface parking. Like the project, public utilities are provided to serve the existing uses; and the existing development does not result in significant impacts to water, sewer, storm water drainage, and solid waste. Therefore, the No Project/No Build Alternative and the project would be considered to have the same level of non-impact associated with public utilities.

Cumulative Effects. As presented in Section 6.0, *Cumulative Effects*, the project would result in cumulative impacts which, when considered together with other past, present, and reasonably future projects, are considerable or which compound or increase other environmental impacts to transportation/circulation. Under the No Project/No Build Alternative, the project site would remain as it is developed today, with office buildings and surface parking. This alternative would not result in any new significant impacts. This alternative would not result in significant contributions to cumulative environmental impacts.

Evaluation of Alternative

When compared to the project, the No Project/No Build Alternative would eliminate the potential for direct significant impacts to historical resources and tribal cultural resources, as no new development would occur. The No Project/No Build Alternative would also eliminate the potential for a cumulative impact to traffic circulation on one street segment. The No Project/No Build Alternative would also reduce environmental effects associated with air quality and GHG, as no new trips would occur under this alternative. There would be no impacts to public services associated with schools, libraries, and recreation, as no residential development would occur. However, based on the analysis in this EIR, none of those effects would be regarded as significant under the project. The No Project/No Build Alternative has the potential to result in slightly greater impacts to visual quality and neighborhood character and energy, although such impacts would not reach a level of significance.

For all other issue areas, the No Project/No Build Alternative would result in the same level of environmental effects as the project. The No Project/No Build Alternative would not meet any of the project objectives.

10.3.2 *Alternative 2 - Reduced Density Alternative*

A Reduced Density Alternative was evaluated that would reduce the project's proposed residential density. Project impacts to historical resources (archaeological) and tribal cultural resources (in the form of archeological resources) cannot be reduced and/or avoided with any redevelopment of the project site and are, therefore, not included in the discussion below as part of this alternative. As concluded in the Focused Transportation Study and

Section 5.2, *Transportation/Circulation*, the project would result in one Horizon Year (2035) cumulative impact on Camino del Rio North from Camino de la Siesta to Camino del Arroyo.

The Reduced Density Alternative would include a mix of residential, commercial, and retail uses, like the project. However, this alternative would reduce the number of residential units by 60 percent compared to the project, from 277 units to 160 units. Commercial office and retail square footage would be the same as the project. Development under this alternative would be more traditional with regard to the unit make-up and design, and would not provide the mix and type of housing provided by the project. As such, this alternative would eliminate the shopkeeper units and amenities that are included in the project related to supporting home-business uses. It would be assumed that the Reduced Density Alternative would be designed based on the USGBC LEED for Homes Silver Certification like the project. This alternative would implement requirements of the SDMC related to the provision of private and common open space areas. However, the amount of common outdoor amenity space provided to residents would be commensurately reduced, resulting in either one consolidated amenity area (versus the three provided with the project) or two amenity areas of reduced size and features commensurate with the reduced unit count. Additionally, due to the overall reduction in the development intensity, this alternative would not offer quasi-public amenities, such as the pedestrian plaza fronting on Camino de la Reina. The Reduced Density Alternative would result in construction of a mixed-use development, parking structure, and associated surface parking. Due to the reduced development intensity, the parking structure may be wrapped, as with the project, or may be a stand-alone/exposed structure, depending on the specific design of the reduced residential component. Because less parking would be needed to support the reduction in residential units, this alternative would be served by a greater amount of surface parking. Like the project, the design under this alternative would occur in a manner compatible with surrounding buildings in west-central Mission Valley.

Environmental Analysis

Land Use. As presented in Section 5.1, *Land Use*, the project would be consistent with all applicable goals, policies, and objectives of the General Plan. As presented in Section 5.7, *Noise*, the project would result in interior noise levels in excess of the City's Noise Compatibility Guidelines requirements. However, project design features, including windows with STC ratings higher than those provided by standard building construction and air conditioning, would be implemented as part of the project. Additionally, interior noise levels would be attenuated in accordance with Title 24, bringing the project into conformance with the General Plan's Noise Compatibility Guidelines.

The project would be consistent with the Mission Valley Community Plan's objectives, proposals, and development guidelines, with the exception of a solar access development guideline within the Design Element (i.e. locating the majority of the project's glass areas on the south elevation). The project would be consistent with the regulations of the MVPDO except for the sidewalk width requirements on Camino de la Reina, Camino del Rio North, and Camino de la Siesta and the parkway width requirements on Camino de la Reina. The project proposes a deviation from these requirements to allow for development that addresses the street and allows for pedestrian-scale project features. The reduced sidewalk and parkway widths would not affect pedestrian access as adequate sidewalk space would be provided for pedestrians, therefore, a significant impact would not result.

The Reduced Density Alternative would also be consistent with the General Plan and Community Plan policies applicable to the project site, similar to the project. However, due to the reduced residential density, this alternative would not realize the General Plan's City of Villages strategy as fully as the project and other goals and

policies relative to compact, smart growth developments. Additionally, this alternative would not have as great an ability to provide much-needed housing to serve the City.

Like the project, if deviations are required for this alternative, it is assumed that those are required due to the site's physical configuration and would result in a superior development than what would be provided without the deviations. Relative to secondary land use (noise) impacts, the Reduced Density Alternative would locate residential units proximate to I-8, within areas where noise levels exceed 75 dBA CNEL, and would require noise attenuation as with the project. Thus, with regards to secondary land use effects, this alternative would result in similar impacts relative to noise levels. The Reduced Density Alternative would require the same level of noise attenuation as the project to ensure that interior noise levels are within the acceptable limits prescribed by the City of San Diego General Plan.

Transportation/Circulation. As presented in Section 5.2, *Transportation/Circulation*, the project would generate 581 new ADT, with 84 additional AM peak hour trips and 62 additional PM peak hour trips. The project would result in one significant Horizon Year (2035) cumulative impact on Camino del Rio North from Camino de la Siesta to Camino del Arroyo. Measures would be required that mitigate cumulative traffic impacts to below a level of significance.

As shown in Table 10-2, *Reduced Density Alternative Trip Generation*, the Reduced Density Alternative would generate less traffic than the project due to the reduced number of residential units. ADT would be less with this alternative and would eliminate the significant cumulative impact on Camino del Rio North. Therefore, this alternative would result in less traffic impacts when compared to the project.

Visual Effects and Neighborhood Character. As concluded in Section 5.3, *Visual Effects and Neighborhood Character*, the project's impact on the visual character and quality of the surrounding environment is considered less than significant. The project would not result in a substantial degradation of the existing visual character or quality of the site or its surroundings. The project would not result in bulk, scale, materials, or style that are incompatible with surrounding development; and the project would not result in significant lighting and glare impacts.

Table 10-2. Reduced Density Alternative Trip Generation

Land Use	Intensity	Rate*	ADT	AM Peak Hour					PM Peak Hour				
				Peak %	Vol.	In%:Out%	In	Out	Peak %	Vol.	In%:Out%	In	Out
Multiple Dwelling Units	160	6/unit	960	8%	77	20%:80%	15	61	9%	86	70%:30%	61	26
Commercial Office	3600	Formula	137	13%	18	90%:10%	16	2	14%	19	20%:80%	4	15
Specialty Retail Center/ Strip Commercial	2.5/KSF	40/ KSF	100	3%	3	60%:40%	2	1	9%	9	50%:50%	5	5
High Turnover (sit-down) Restaurant	3.5/ KSF	130/ KSF	455	8%	36	50%:50%	18	18	8%	36	60%:40%	22	15
REDUCED INTENSITY SUB TOTAL			1,652		134		51	82		151		92	61
MXD CREDIT %			17%		14%		14%	14%		15%		15%	15%
MXD CREDIT			281		19		7	11		23		14	9
SUBTOTAL (with MXD Credit)			1,371		115		44	71		128		78	52
Existing Land Uses													
Car Dealer	20.4/KSF	50/KSF	1,019	5%	51	70%:30%	36	15	8%	82	40%:60%	33	49
Repair Shop	17.7/KSF	20/KSF	354	8%	28	70%:30%	20	8	11%	39	40%:60%	16	23
Existing SUBTOTAL			1,373		79		55	24		120		48	72
NET TOTAL (REDUCED INTENSITY - MXD- EXISTING)			-2		36		0	47		8		31	0

Source:

*Rates taken from City of San Diego Trip Generation manual, May 2003

Note:

ADT = Average Daily Trips

KSF = 1,000 square feet

Density = 54 units per acre

Formula: $\ln(T) = 0.756\ln(x) + 3.95$

The Reduced Density Alternative would develop a mixed-use building similar to the project. This alternative would reduce the amount of common outdoor amenity space provided to residents, resulting in either one consolidated amenity area (versus the three provided with the project) or two amenity areas of reduced size and features. Additionally, due to the overall reduction in the development intensity, this alternative would not offer quasi-public amenities, such as the pedestrian plaza fronting on Camino de la Reina. Like the project, general building design would be in keeping with the architectural style of the surrounding development. However, because parking requirements would be reduced, the size of the parking structure could also be reduced with more surface parking. Similar to the project, this alternative would be designed in a manner that would be compatible with the neighborhood character. Significant impacts to visual quality and neighborhood character would not be expected. Therefore, both this alternative and the project would result in less than significant impacts to visual effects and neighborhood character.

Air Quality. As presented in Section 5.4, *Air Quality*, the project is consistent with applicable air quality control plans, including the RAQS, the SIP, and SANDAG's Transportation Control Measures. Operational emissions would be below the significance thresholds for all pollutants. Additionally, CO impacts would be less than significant because no CO "hot spots" would result from the project. Construction impacts would be temporary and for a short duration. Therefore, air quality impacts associated with project operations and construction would not be significant.

The Reduced Density Alternative would result in less impacts to air quality when compared to the project, because less traffic generation would occur as a result of fewer residential units. This alternative would be consistent with applicable plans. When compared to the project, the Reduced Density Alternative results in less air quality impacts, although the project would not result in significant air quality impacts.

Greenhouse Gas Emissions. As presented in Section 5.5, *Greenhouse Gas Emissions*, the project would not conflict with the CAP or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases. The project would not result in a significant impact relative to plans, policies, or regulations aimed at reducing GHG emissions. Project impacts associated with GHG emissions would, therefore, be less than significant with the project.

The Reduced Density Alternative would result in less impacts associated with greenhouse gas emissions than the project, because this alternative would result in less traffic generation. When compared with the project, the Reduced Density Alternative would result in less impacts associated with greenhouse gas emissions, although the project would not result in significant greenhouse gas emissions impacts.

Energy. As presented in Section 5.6, *Energy*, the project would increase demand for energy in the project area and SDG&E's service area. However, no adverse effects on non-renewable resources are anticipated. The project would follow UBC and Title 24 requirements for energy efficiency, USGBC LEED for Homes Silver Certification standards, and would be consistent with the CAP by incorporating sustainable design features directed at reducing energy consumption.

The Reduced Density Alternative would be developed with sustainable design features as required by title 24 and the City's CAP but would not attain LEED Silver for Homes Certification. However, such features would not be to the level proposed by the project commiserate with the reduction in residential units. Therefore, the Reduced Development Alternative's impact on energy would be considered greater than the project.

Noise. As presented in Section 5.7, *Noise*, the project would not generate significant noise levels affecting ambient off-site noise levels, either during construction or operation. Furthermore, the project would not generate noise that, when added to noise generated by other projects would be regarded as significant.

Traffic-related noise generated by this alternative would likely be reduced commiserate to the reduction in density; however, traffic-related noise impacts are not significant for the project. The Reduced Density Alternative's impact on noise would be considered similar to the project.

Historical Resources. As presented in Section 5.8, *Historical Resources*, the project would involve the demolition of the existing structures on the site. Structures on the property were constructed in 1966 and therefore could be more than 45 years old. However, the property does not meet local criteria as an individually significant resource under the adopted Historic Resource Boards Criteria. Therefore, no potentially significant structures are present on the property and the project would not adversely affect an historic resource. Although no historical resources were identified within the boundaries of the project site, recorded sites have been identified within proximity to the project site. Due to the sensitivity of the area, potentially significant impacts to unknown subsurface archeological resources could result during ground-disturbing activities. In order to mitigate potential impacts to unknown subsurface archaeological resources, archaeological monitoring would be required in areas of the project site not impacted by the construction of the existing building, such as the landscaped areas and parking lots surrounding the existing building.

The Reduced Density Alternative would have the same level of potential impacts to unknown subsurface resources as the project. Monitoring would be required, as with the project, to mitigate potential impacts to below a level of significance.

Tribal Cultural Resources. As concluded in Section 5.9, *Tribal Cultural Resources*, no tribal cultural resources were identified within the boundaries of the project site. Potentially significant impacts to unknown subsurface archeological resources could result during ground-disturbing activities due to the sensitivity of the area. In order to mitigate potential impacts to TCRs (in the form of archaeological resources), archaeological monitoring would be required.

The Reduced Density Alternative would have the same level of potential impacts to unknown subsurface resources as the project. Monitoring would be required, as with the project, to mitigate potential impacts to below a level of significance.

Health and Safety. As presented in Section 5.10, *Health and Safety*, the project would be designed in accordance with applicable safety standards and would not impair implementation of, or physically interfere with, emergency response plans or emergency evacuation plans. The project site is not listed as a hazardous materials site; two LUST clean up sites that have been closed were identified on the project site. According to the Phase I Environmental Site Assessment conducted for the project, existing buildings may contain asbestos and lead. Industry standards in place would insure no risk to workers by hazardous materials during demolition and construction. Although the project site is within the AIAs of San Diego International Airport and Montgomery Field, the project would not result in impacts associated with the respective ALUCPs. As a result, the project would not result in impacts associated with health and safety.

There are no current health risks relative to surrounding hazardous materials handlers that would be regarded as significant for the Reduced Density Alternative. Additionally, the Reduced Density Alternative would be consistent

with the ALUCPs for San Diego International Airport and Montgomery Field. Like the project, this alternative would not result in any significant impacts relative to health and safety.

Public Services and Facilities. As presented in Section 5.11, *Public Services and Facilities*, the project site is currently developed with structures and on-site surface parking. Existing development is served by public service facilities, such as fire/life safety protection and police protection. The project would not result in significant impacts to police protection, fire/life safety protection, libraries, parks or other recreation facilities, and schools.

The Reduced Density Alternative would have a similar demand on public services for police protection and fire and safety as the project. This alternative would have a lower residential unit count and generate less residential population to use school, library, and recreational services. Therefore, this alternative's impact on public services would be slightly less than the project. The alternative would not result in a significant impact to public services and facilities, similar to the project.

Public Utilities. As concluded in Section 5.12, *Public Utilities*, the project would not result in significant impacts to water, sewer, solid waste, and communications systems. The Reduced Density Alternative's impact on public utilities would be similar to the project. Like the project, no impacts are anticipated under this alternative.

Cumulative Effects. As presented in Section 6.0, *Cumulative Effects*, the project would result in cumulative impacts which, when considered together with other past, present, and reasonably future projects, are considerable or which compound or increase other environmental impacts to transportation/circulation. The Reduced Density Alternative would not result in cumulative impacts to street segments along Camino del Rio North. This alternative would not result in any cumulatively significant impacts.

Evaluation of Alternative

Like the project, the Reduced Density Alternative would be consistent with the General Plan, Community Plan, and existing zoning. However, less environmental impacts would result from this alternative with regards to traffic, which is identified as a significant environmental effect of the project, as a Reduced Density Alternative would generate fewer ADTs than the project and would not result in any cumulatively significant traffic effects. This alternative would result in less air quality and GHG emissions, as less traffic would occur, and slightly less impacts to public services due to a smaller residential population. However, those issue areas were not found to be significant in the analysis in the EIR. This alternative would not implement land use goals of the General Plan to the extent associated with the project.

For all other issue areas (i.e., visual quality and neighborhood character, noise, energy, public utilities, historical, tribal cultural resources, and public services and facilities), the Reduced Density Alternative would result in the same level of environmental effects as the project.

This alternative would meet some of the project objectives. Specifically, this alternative would meet seven of the 10 project's objectives:

- Create a coherent and cohesive building site and site design that is compatible in scale and character and enhances the existing community character in the Mission Valley community.
- Implement a project that is sustainable based on the USGBC LEED for Homes Silver certification standards to reduce the project's overall carbon footprint, water and energy use, and generation of greenhouse gas emissions.

- In keeping with the City of Villages and Smart Growth policies, provide for a mix of commercial, retail, and residential uses as in-fill development of an underutilized site within an urban area where public facilities, transit, and services are readily available and easily accessed via alternative modes of travel, including mass transit, and active transportation.
- Enhance this portion of the Mission Valley community by creating a “Main Street” feel along Camino de la Reina, with buildings that address the street and open pedestrian areas that front on Camino de la Reina.
- Create additional retail and job opportunities in the Mission Valley community.
- Utilize architecture and design elements to ensure high quality design and aesthetics.
- Provide retail amenities for the adjacent employment and residential uses that are not only within walking distance but also capture drive-by automobile trips and walk-up trips from adjacent properties, thereby reducing the amount of routine daily trips.

This alternative would not provide opportunities for live-work space, with supporting amenities, nor would it provide for a mix and type of residential units. The Reduced Density Alternative would not maximize the efficiency in use of the project site nor would it cluster high-density housing opportunities in the Mission Valley community. Redevelopment of the project site to cluster high-density housing opportunities in the Mission Valley community where transit and other amenities are readily available would not occur under this alternative, and this alternative would also not create a focal point/pedestrian plaza that functions as a space for social gatherings.

10.3.3 *Alternative 3 - All Commercial Development Alternative*

An alternative was considered that would redevelop the project site as an all-commercial retail project, as allowed within the existing land use designation and zone. In order to stay within the Threshold 2 traffic limits of the PDO (i.e., no more than 1,765 ADT for the project site), 44,137 square feet of commercial retail development could occur on the project site. This alternative would be a one- to two-story retail building or buildings, with 44,137 square feet of multi-tenant retail. Parking would be provided in surface lots and/or a parking structure in accordance with City parking requirements for multi-tenant retail use. The design of the retail building(s) would be with appropriate architectural detail and in keeping with the styles, bulk, and scale of other commercial developments in west-central Mission Valley. Like the project, this alternative would be elevated out of the 100-year floodplain. Additionally, for purposes of the environmental analysis, it is assumed that the All Commercial Development alternative would include sustainable design features required by the CAP Consistency Checklist.

Environmental Analysis

Land Use. As presented in Section 5.1, *Land Use*, the project would be consistent with all applicable goals, policies, and objectives of the General Plan. As presented in Section 5.7, *Noise*, the project would result in interior noise levels in excess of the City’s Noise Compatibility Guidelines requirements. However, project design features, including windows with STC ratings higher than those provided by standard building construction and air conditioning, would be implemented as part of the project. Additionally, interior noise levels would be attenuated in accordance with Title 24, bringing the project into conformance with the General Plan’s Noise Compatibility Guidelines.

The project would be consistent with the Mission Valley Community Plan’s objectives, proposals, and development guidelines, with the exception of a solar access development guideline within the Design Element (i.e. locating the majority of the project’s glass areas on the south elevation). The project would be consistent with the regulations of the MVPDO except for the sidewalk width requirements ~~on Camino de la Reina, Camino del Rio North, and~~

Camino de la Siesta and the parkway width requirements on Camino de la Reina. The project proposes a deviation from these requirements to allow for development that addresses the street and allows for pedestrian-scale project features. The reduced sidewalk and parkway widths would not affect pedestrian access as adequate sidewalk space would be provided for pedestrians therefore, a significant impact would not result.

Although this alternative would provide commercial land uses that contribute to a village, it would not provide a mix of residential units. Therefore, it would not realize the General Plan's City of Villages strategy and other goals and policies relative to compact, smart growth developments to the extent of the project. Housing opportunities would not occur where existing active transportation, transit, and amenities are located that can serve the population under this alternative.

Like the project, the All Commercial Development Alternative would be consistent with the General Plan, Community Plan, and existing zoning. Like the project, should deviations be required, the deviations would not result in secondary impacts. The All Commercial Development Alternative may require noise attenuation measures like the project to ensure that commercial uses have an interior noise level of 50 dBA CNEL or less.

Transportation/Circulation. As presented in Section 5.2, *Transportation/Circulation*, the project would generate 581 new ADT, with 84 additional AM peak hour trips and 62 additional PM peak hour trips. The project would result in one significant Horizon Year (2035) cumulative impact on Camino del Rio North from Camino de la Siesta to Camino del Arroyo. Measures would be required that mitigate cumulative traffic impacts to below a level of significance.

As shown in Table 10-3, *All Commercial Development Alternative Trip Generation*, the All Commercial Development Alternative would generate 392 new trips, which would be 189 trips less than generated by the project. This alternative would not result in additional AM peak hour trips and would generate less PM peak hour trips. While this alternative would result in less traffic than the project, it would not avoid the significant traffic impact to a segment of Camino Del Rio North between Camino de la Siesta to Camino del Arroyo.

Table 10-3. All Commercial Development Alternative Trip Generation

Land Use	Intensity	Rate*	ADT	AM Peak Hour					PM Peak Hour				
				Peak %	Vol.	In%:Out%	In	Out	Peak %	Vol.	In%:Out%	In	Out
Specialty Retail Center/Strip Commercial	44,137	40/KSF	1,765	3%	53	60%:40%	32	21	9%	159	50%:50%	80	79
COMMERCIAL SUB TOTAL			1,765		53		32	21		159		80	79
Existing Land Uses													
Car Dealer	20.4/KSF	50/KSF	1,019	5%	51	70%:30%	36	15	8%	82	40%:60%	33	49
Repair Shop	17.7/KSF	20/KSF	354	8%	28	70%:30%	20	8	11%	39	40%:60%	16	23
Existing SUBTOTAL			1,373		79		56	23		121		49	72
NET TOTAL (COMMERCIAL- EXISTING)			392		0**		0**	0**		38		31	7

Source:

*Rates taken from City of San Diego Trip Generation manual, May 2003

** Negative values have been adjusted to zero (0)

Note:

ADT = Average Daily Trips

KSF = 1,000 square feet

Visual Effects and Neighborhood Character. As concluded in Section 5.3, *Visual Effects and Neighborhood Character*, the project's impact on the visual character and quality of the surrounding environment is considered less than significant. The project would not result in a substantial degradation of the existing visual character or quality of the site or its surroundings. The project would not result in bulk, scale, materials, or style that are incompatible with surrounding development; and the project would not result in significant lighting and glare impacts.

The All Commercial Development Alternative would develop a one- to two-story retail building or buildings totaling 44,137 square feet. This alternative would not include amenity areas or offer quasi-public amenities, such as the pedestrian plaza fronting on Camino de la Reina. Like the project, general building design would be in keeping with the architectural style of the surrounding commercial. Significant impacts to visual quality and neighborhood character would not be expected. Therefore, both this alternative and the project would result in less than significant impacts to visual effects and neighborhood character.

Air Quality. As presented in Section 5.4, *Air Quality*, the project is consistent with applicable air quality control plans, including the RAQS, the SIP, and SANDAG's Transportation Control Measures. Operational emissions would be below the significance thresholds for all pollutants. Additionally, CO impacts would be less than significant because no CO "hot spots" would result from the project. Construction impacts would be temporary and for a short duration. Therefore, air quality impacts associated with project operations and construction would not be significant.

The All Commercial Development Alternative would result in less impacts to air quality because less traffic generation would occur. This alternative would be consistent with applicable plans. When compared to the project, the All Commercial Development Alternative results in less air quality impacts.

Greenhouse Gas Emissions. As presented in Section 5.5, *Greenhouse Gas Emissions*, the project would not conflict with the CAP or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases. The project would not result in a significant impact relative to plans, policies, or regulations aimed at reducing GHG emissions. Project impacts associated with GHG emissions would, therefore, be less than significant with the project.

The All Commercial Development Alternative would result in less impacts associated with greenhouse gas emissions than the project, because this alternative would result in less trips. However, this alternative would not intensify residential uses in a Transit Priority Area and would have less overall benefit in regard to the City's CAP. When compared with the project, the All Commercial Alternative would result in less impacts associated with greenhouse gas emissions.

Energy. As presented in Section 5.6, *Energy*, the project would increase demand for energy in the project area and SDG&E's service area. However, no adverse effects on non-renewable resources are anticipated. The project would follow UBC and Title 24 requirements for energy efficiency, USGBC LEED for Homes Silver Certification standards, and would be consistent with the CAP by incorporating sustainable design features directed at reducing energy consumption.

The All Commercial Development Alternative would develop with a similar level of sustainable design features as the project. The All Commercial Development Alternative's impact on energy would be considered similar to the project.

Noise. As presented in Section 5.7, *Noise*, the project would not generate significant noise levels affecting ambient off-site noise levels during construction or operation. Furthermore, the project would not generate noise that, when added to noise generated by other projects would be regarded as significant.

The All Commercial Development Alternative would require the same noise attenuation measures of the project during project construction. Similar to the commercial components of the project, this alternative would need to

ensure that interior noise levels would not exceed 50 dBA CNEL, which may be accomplished through building construction of siting of buildings in such a manner that they are shielded from exterior noise (such as placement of a parking garage, if proposed, adjacent to the freeway). The All Commercial Development Alternative's impact on noise would be similar to the project.

Historical Resources. As presented in Section 5.8, *Historical Resources*, the project would involve the demolition of the existing structures on the site. Structures on the property were constructed in 1966 and therefore could be more than 45 years old. However, the property does not meet local criteria as an individually significant resource under the adopted Historic Resource Boards Criteria. Therefore, no potentially significant structures are present on the property and the project would not adversely affect an historic resource. Although no historical resources were identified within the boundaries of the project site, recorded sites have been identified within proximity to the project site. Due to the sensitivity of the area, potentially significant impacts to unknown subsurface archeological resources could result during ground-disturbing activities. In order to mitigate potential impacts to unknown subsurface archaeological resources, archaeological monitoring would be required in areas of the project site not impacted by the construction of the existing building, such as the landscaped areas and parking lots surrounding the existing building.

The All Commercial Development Alternative would have the same level of potential impacts to unknown subsurface resources as the project. Monitoring would be required, as with the project, to mitigate potential impacts to below a level of significance.

Tribal Cultural Resources. As concluded in Section 5.9, *Tribal Cultural Resources*, no tribal cultural resources were identified within the boundaries of the project site. Due to the sensitivity of the area, potentially significant impacts to unknown subsurface archeological resources could result during ground-disturbing activities. In order to mitigate potential impacts to TCRs (in the form of archaeological resources), archaeological monitoring would be required.

The All Commercial Development Alternative would have the same level of potential impacts to unknown subsurface resources as the project. Monitoring would be required, as with the project, to mitigate potential impacts to below a level of significance.

Health and Safety. As presented in Section 5.10, *Health and Safety*, the project would be designed in accordance with applicable safety standards and would not impair implementation of, or physically interfere with, emergency response plans or emergency evacuation plans. The project site is not listed as a hazardous materials site; two LUST clean up sites that have been closed were identified on the project site. According to the Phase I Environmental Site Assessment conducted for the project, existing buildings may contain asbestos and lead. Industry standards in place would insure no risk to workers by hazardous materials during demolition and construction. Although the project site is within the AIAs of San Diego International Airport and Montgomery Field, the project would not result in impacts associated with the respective ALUCPs. As a result, the project would not result in impacts associated with health and safety.

There are no current health risks relative to surrounding hazardous materials handlers that would be regarded as significant for the All Commercial Development Alternative. Additionally, the All Commercial Development Alternative would be consistent with the ALUCPs for San Diego International Airport and Montgomery Field. Like the project, this alternative would not result in any significant impacts relative to health and safety.

Public Services and Facilities. As presented in Section 5.11, *Public Services and Facilities*, the project site is currently developed with existing structures and on-site surface parking. Existing development is served by public service facilities, such as fire/life safety protection and police protection. The project would not result in significant impacts to police protection, fire/life safety protection, libraries, parks or other recreation facilities, and schools.

The All Commercial Development Alternative would have less demand on public services for police protection and fire and safety as the project. This alternative would not have a residential unit count and would not generate a residential population that use school, library, and recreational services. In this manner, this alternative's impact on public services would be less than the project. Nonetheless, the project would not result in a significant impact to public services and facilities.

Public Utilities. As concluded in Section 5.12, *Public Utilities*, the project would not result in significant impacts to water, sewer, solid waste, and communications systems. The All Commercial Development Alternative's impact on public utilities would be similar to the project. Like the project, no impacts are anticipated under this alternative.

Cumulative Effects. As presented in Section 6.0, *Cumulative Effects*, the project would result in cumulative impacts which, when considered together with other past, present, and reasonably future projects, are considerable or which compound or increase other environmental impacts to transportation/circulation/parking. The All Commercial Development Alternative would also result in cumulative impacts to street segment along Camino del Rio North. Thus, this alternative would have the same cumulatively significant impact as the project.

Evaluation of Alternative

Like the project, the All Commercial Development Alternative would be consistent with the General Plan, Community Plan, and existing zoning. This alternative would result in less traffic than the project but would not avoid the significant traffic impact to a segment of Camino Del Rio North between Camino de la Siesta to Camino del Arroyo. There would be no impacts to public services associated with schools, libraries, and recreation as no residential development would occur. However, based on the analysis in this EIR, none of those effects would be regarded as significant under the project.

For all other issue areas (i.e., energy, public utilities, tribal cultural resources, and cumulative effects), the All Commercial Development alternative would result in the same level of environmental effects as the project. The All Commercial Development Alternative would have greater impacts in the area of visual effects and neighborhood character.

This alternative would meet some of the project objectives. Specifically, this alternative would meet six of the 10 project's objectives:

- Create a coherent and cohesive building site and site design that is compatible in scale and character and enhances the existing community character in the Mission Valley community.
- Implement a project that is consistent with the City's Climate Action Plan (CAP) and is sustainable based on the USGBC LEED for Homes Silver certification standards to reduce the project's overall carbon footprint, water and energy use, and generation of greenhouse gas emissions.
- Enhance this portion of the Mission Valley community by creating a "Main Street" feel along Camino de la Reina, with buildings that address the street and the provision of open pedestrian areas that front on Camino de la Reina.

- Create additional retail and job opportunities in the Mission Valley community.
- Utilize architecture and design elements that ensure high quality design and aesthetics.
- Provide retail amenities for the adjacent employment and residential uses that are not only within walking distance but also capture drive-by automobile trips and walk-up trips from adjacent properties, thereby reducing the amount of routine daily trips.

This alternative would not provide a mix of retail, office, and residential uses and would not provide shopkeeper units where access to other amenities and transit are within walking distance; would not result in maximizing efficiency in use of the project site; would not redevelop the project site to cluster high-density housing opportunities in the Mission Valley community where transit and other amenities are readily available; and would not provide quasi-public space for community use in the form of a pedestrian plaza.

10.4 Environmentally Superior Alternative

The environmental analysis of alternatives presented above is summarized in Table 10-4, *Comparison of Alternatives to Proposed Project*. CEQA requires that the EIR identify the environmentally superior alternative among all of the alternatives considered, including the project. If the No Project alternative is selected as environmentally superior, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

For the project, the No Project/No Build Alternative would be selected as the environmentally superior alternative, as the No Project/No Build Alternative would result in less environmental effects. However, this alternative would not meet any of the project objectives.

CEQA requires that, if the No Project Alternative is selected as environmentally superior, then the EIR shall also identify an environmentally superior alternative among the other alternatives. For the project, the Reduced Density Alternative would be selected as the environmentally superior alternative to the project. The Reduced Density Alternative would eliminate the one significant cumulative traffic impact to a segment of Camino del Rio North. The Reduced Density Alternative would result in the development of 117 less residential units, thereby reducing the effect of redeveloping the project site to create much-needed housing opportunities in the Mission Valley community where transit and other amenities are readily available.

Table 10-4. Comparison of Alternatives to Proposed Project

Environmental Issue Area	Proposed Project	Alternative 1 No Project/No Build	Alternative 2 Reduced Density	Alternative 3 All Commercial Development
Land Use	No significant impacts.	Same as the project.	Same as the project.	Same as the project.
Transportation/ Circulation	Fully mitigated cumulative street segment impact.	No impacts, as no new trips would be generated.	No significant impacts, due to less ADT.	Less traffic generated, but would not avoid significant traffic cumulative street segment impact.
Visual Effects and Neighborhood Character	No significant impacts.	Same as the project.	Same as the project.	Same as the project.
Air Quality	No significant impacts.	Less than the project, because no traffic generated.	Less than the project, because less ADT.	Less than the project, because less ADT.
Greenhouse Gas Emissions	No significant impacts.	Less than the project, because no traffic generated.	Less than the project, because less ADT.	Less than the project, because less ADT.
Energy	No significant impacts.	Same as the project.	Greater impacts.	Greater impacts.
Noise	No significant impacts.	Less than the project, because no traffic generated and no construction noise.	Same as the project.	Less than the project because it would not provide residential units.
Historical Resources	Potential impacts to unknown subsurface resources.	No impacts, because no new development.	Same as the project.	Same as the project.
Tribal Cultural Resources	Potential impacts to unknown subsurface resources.	No impacts, because no new development.	Same as the project.	Same as the project.
Public Services and Facilities	No significant impacts.	Less than the project, because no new development.	Less demand on public services and utilities than the project, because would provide fewer residential units.	Less demand on public services and utilities than the project, because would not provide residential units.
Public Utilities	No significant impacts.	Less than the project, because no new development.	Same as the project.	Same as the project.
Health and Safety	No significant impacts.	No significant impacts.	Same as the project.	Same as the project.
Cumulative Effects	Fully mitigated cumulative street segment impact.	No significant impacts.	No significant impacts.	Same as the project.

11.0 MITIGATION MONITORING AND REPORTING PROGRAM

CEQA, Section 21081.6, requires that a mitigation monitoring and reporting program (MMRP) be adopted upon certification of an EIR to ensure that the mitigation measures are implemented. The mitigation monitoring and reporting program specifies what the mitigation is, the entity responsible for monitoring the program, and when in the process it should be accomplished.

The EIR, incorporated herein as referenced, focuses on issues determined to be potentially significant by the City of San Diego. The issues addressed in the EIR include land use, transportation/traffic, air quality, energy, greenhouse gases, health and safety, historical resources, tribal cultural resources, noise, public services, public utilities, visual quality and neighborhood character.

PRC section 21081.6 requires the monitoring of measures proposed to mitigate significant environmental effects. Issues related to transportation/circulation, historical resources, and tribal cultural resources were determined to be potentially significant and require mitigation as described in this EIR. All issues will be fully mitigated to below a level of significance with implementation of mitigation measures.

The mitigation monitoring and reporting program for the project is under the jurisdiction of San Diego and other agencies as specified in the table below. The mitigation monitoring and reporting program for the project addresses only the issue areas identified above as potentially significant. The following is an overview of the mitigation monitoring and reporting program to be completed for the project.

11.1 Monitoring Activities

Monitoring activities would be accomplished by individuals identified in the attached MMRP table. While specific qualifications should be determined by the City of San Diego, the monitoring team should possess the following capabilities:

- Interpersonal, decision-making, and management skills with demonstrated experience in working under trying field circumstances;
- Knowledge of and appreciation for the general environmental attributes and special features found in the project area;
- Knowledge of the types of environmental impacts associated with construction of cost-effective mitigation options; and
- Excellent communication skills.

11.2 Program Procedures

Prior to any construction activities, meetings should take place between all the parties involved to initiate the monitoring program and establish the responsibility and authority of the participants.

Mitigation measures that need to be defined in greater detail would be addressed prior to any project plan approvals in follow-up meetings designed to discuss specific monitoring effects.

An effective reporting system must be established prior to any monitoring efforts. All parties involved must have a clear understanding of the mitigation measures as adopted and these mitigations must be distributed to the

participants of the monitoring effort. Those that would have a complete list of all the mitigation measures adopted by the City of San Diego would include the City of San Diego and its Mitigation Monitor. The Mitigation Monitor would distribute to each Environmental Specialist and Environmental Monitor a specific list of mitigation measures that pertain to his or her monitoring tasks and the appropriate time frame that these mitigations are anticipated to be implemented.

In addition to the list of mitigation measures specified in the table below, the monitors would have mitigation monitoring report (MMR) forms, with each mitigation measure written out on the top of the form. Below the stated mitigation measure, the form shall have a series of questions addressing the effectiveness of the mitigation measure. The monitors shall complete the MMR and file it with the MMC Section following the monitoring activity. The MMC shall then include the conclusions of the MMR into an interim and final comprehensive construction report to be submitted to the City of San Diego. This report shall describe the major accomplishments of the monitoring program, summarize problems encountered in achieving the goals of the program, evaluate solutions developed to overcome problems, and provide a list of recommendations for future monitoring programs. In addition, and if appropriate, each Environmental Monitor or Environmental Specialist shall be required to fill out and submit a daily log report to the Mitigation Monitor. The daily log report would be used to record and account for the monitoring activities of the monitor. Weekly and/or monthly status reports, as determined appropriate, shall be generated from the daily logs and compliance reports and shall include supplemental material (e.g., memoranda, telephone logs, and letters).

11.3 Mitigation Measures

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

1. Prior to the issuance of a Notice To Proceed (NTP) for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve all Construction Documents (CD), (plans, specification, details, etc.) to ensure the 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 (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website:

<http://www.sandiego.gov/development-services/industry/standtemp.shtml>

4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.
5. **SURETY AND COST RECOVERY** – The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long term performance or implementation of required mitigation measures or programs. The City is

11.0 MITIGATION MONITORING AND REPORTING PROGRAM

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 TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the Permit holder's Representative(s), Job Site Superintendent and the following consultants: **Not applicable.**

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 **RE and MMC at 858-627-3360**
2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) Number 562764 and/or Environmental Document Number 562764, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (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 RE and MMC if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by RE and MMC BEFORE the work is performed.**
3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE 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: **Not Applicable**
4. **MONITORING EXHIBITS:** All consultants are required to submit, to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of

11.0 MITIGATION MONITORING AND REPORTING PROGRAM

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.

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:

Document Submittal/Inspection Checklist		
Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Waste Management	Waste Management Reports	Waste Management Inspections
Archaeology	Records Search/Monitoring Report(s)	Archaeology/Historic Site Observation
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter
Tribal Cultural Resources	Archaeology Reports	Archaeology/Historic Site Observation
Traffic	Traffic Reports	Traffic Features Site Observation

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

The following table (Table 11-1, *Mitigation Monitoring and Reporting Program*) summarizes the potentially significant project impacts and lists the associated mitigation measures and the monitoring efforts necessary to ensure that the measures are properly implemented. All the mitigation measures identified in the EIR are stated herein.

Table 11-1. Mitigation Monitoring and Reporting Program

Potential Significant Impact	Mitigation Measure(s)	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
<i>Transportation/Circulation</i>			
Impact 5.2-1: The project would result in a cumulatively significant impact at the segment of Camino del Rio North from Camino de la Siesta to Camino del Arroyo under the Horizon Year plus Project conditions.	MM 5.2-1 Camino del Rio North from Camino de la Siesta to Camino del Arroyo Prior to issuance of the first building permit, the owner permittee shall assure by permit and bond the construction of a two-way left turn lane on Camino del Rio North from Camino del Arroyo to Camino de la Siesta to the satisfaction of the City Engineer and construction should be complete and accepted by the City prior to the issuance of the first certificate of occupancy. This improvement and would provide adequate storage for vehicles wishing to access the project and increase overall segment capacity.	First Building Permit	City of San Diego
<i>Historical Resources</i>			
Impact 5.8-1: The proposed project could result in direct impacts to unknown subsurface archaeological resources as a result of grading.	MM 5.8-1 ARCHAEOLOGICAL RESOURCES 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	During Grading	City of San Diego

11.0 MITIGATION MONITORING AND REPORTING PROGRAM

	<p>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.</p> <ol style="list-style-type: none"> 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. 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>A. Verification of Records Search</p> <ol style="list-style-type: none"> The PI shall provide verification to MMC that a site-specific records search (1/4 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. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities. The PI may submit a detailed letter to MMC requesting a reduction to the ¼ mile radius. <p>B. PI Shall Attend Precon Meetings</p> <ol style="list-style-type: none"> 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) 		
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11.0 MITIGATION MONITORING AND REPORTING PROGRAM

	<p>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.</p> <ol 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. Identify Areas to be Monitored <ol 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. When Monitoring Will Occur <ol 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 		
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11.0 MITIGATION MONITORING AND REPORTING PROGRAM

	<p>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.</p> <p>III. During Construction</p> <p>A. Monitor(s) Shall be Present During Grading/Excavation/Trenching</p> <ol style="list-style-type: none"> 1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and 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 OSHA safety requirements may necessitate modification of the AME. 2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and 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 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 		
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11.0 MITIGATION MONITORING AND REPORTING PROGRAM

	<p>fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.</p> <ol style="list-style-type: none"> 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 also 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. 		
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11.0 MITIGATION MONITORING AND REPORTING PROGRAM

	<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 (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:</p> <ul style="list-style-type: none"> A. Notification <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 		
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11.0 MITIGATION MONITORING AND REPORTING PROGRAM

	<p>Development Services Department to assist with the discovery notification process.</p> <ol style="list-style-type: none"> 2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone. <p>B. Isolate discovery site</p> <ol style="list-style-type: none"> 1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the 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. <p>C. If Human Remains ARE determined to be Native American</p> <ol style="list-style-type: none"> 1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call. 2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information. 3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes. 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. 		
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11.0 MITIGATION MONITORING AND REPORTING PROGRAM

	<p>5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:</p> <ul style="list-style-type: none">a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR;b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THENc. To protect these sites, the landowner shall do one or more of the following:<ul style="list-style-type: none">(1) Record the site with the NAHC;(2) Record an open space or conservation easement; or(3) Record a document with the County. The document shall be titled "Notice of Reinternment 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>V. Night and/or Weekend Work</p> <ul style="list-style-type: none">A. If night and/or weekend work is included in the contract		
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11.0 MITIGATION MONITORING AND REPORTING PROGRAM

	<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 8AM of the next business day. b. Discoveries All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery. c. Potentially Significant Discoveries If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV-Discovery of Human Remains shall be followed. d. The PI shall immediately contact MMC, or by 8AM 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 <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. C. All other procedures described above shall apply, as appropriate. 		
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11.0 MITIGATION MONITORING AND REPORTING PROGRAM

	<p>VI. Post Construction</p> <p>A. Preparation and Submittal of Draft Monitoring Report</p> <p>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.</p> <p>a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.</p> <p>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.</p>		
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11.0 MITIGATION MONITORING AND REPORTING PROGRAM

	<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. Handling of Artifacts</p> <ol style="list-style-type: none"> 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and 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. Curation of artifacts: Accession Agreement and Acceptance Verification</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 		
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11.0 MITIGATION MONITORING AND REPORTING PROGRAM

	<p>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> <p>D. Final Monitoring Report(s)</p> <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. 		
<i>Tribal Cultural Resources</i>			
Impact 5.9-1: The project could result in direct impacts to unknown subsurface tribal cultural resources (archaeological), as a result of grading.	MM 5.8-1 (see Historical Resources, above)	During Grading	City of San Diego

12.0 REFERENCES

A list of the reference materials consulted in the course of the EIR's preparation is included in this section.

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13.0 INDIVIDUALS AND AGENCIES CONSULTED

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. This EIR is based on independent analysis and determination made pursuant to the San Diego Land Development Code Section 128.0103.

Provided below is a list of City of San Diego staff, as well as the environmental and technical consultants, who assisted in preparing this document.

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