



THE CITY OF SAN DIEGO

## NEGATIVE DECLARATION

Project No. 538814  
SCH No. 2018111057

**SUBJECT:** **Abbott Residence CDP SDP:** Coastal Development Permit (CDP) and Site Development Permit (SDP) for a proposed 214 square foot addition to the main level and a 3,488 square foot addition to the second story of an existing residential single dwelling unit. The project site has two detached garages and the northern garage would be remodeled to include a 359 square foot office. An additional 309 square feet would be added to the existing south garage. There would be a total of 4,370 square feet of new construction for a total of 11,731 square feet of development. Existing landscaping, basement and pool would remain. No development regulation deviations are proposed. The proposed project is addressed at 6340 Camino de la Costa, La Jolla, CA 92037. **LEGAL DESCRIPTION:** The southerly 90' of Lot 9 and all of Lot 10 in block 1 of Hermosa Terrace, in the City of San Diego, County of San Diego San Diego, State of California according to map thereof No. 2353, filed in the office of the County Recorder of San Diego County on September 20, 1946; the northerly of said southerly 90.00 feet at right angles northerly from the common line between said lots 9 and 10 in block 1 said line having any bearing of No 89 56;33" West. Except any portion of said land lying below the mean high tide of the Pacific Ocean.)  
**APPLICANT:** Roger Abbott.

I. PROJECT DESCRIPTION:

See attached Initial Study.

II. ENVIRONMENTAL SETTING:

See attached Initial Study.

III. DETERMINATION:

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

IV. DOCUMENTATION:

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

V. MITIGATION, MONITORING AND REPORTING PROGRAM:

None required.

VI. PUBLIC REVIEW DISTRIBUTION:

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

State of California

California Coastal Commission  
State Clearinghouse

City of San Diego

Councilmember Bry, District 1  
City Attorney  
Corrine Neuffer  
Planning Department  
Alyssa Muto  
Development Services Department  
Courtney Holowach, EAS  
Jeff Szymanski, EAS  
Glenn Gargas, Project Manager  
Karen Vera, LDR Engineering  
Patrick Thomas, LDR Geology  
Frank Hunt, LDR Landscaping  
Steve Borjeson, LDR Planning  
Suzanne Segur, Plan Historic  
Central Library  
La Jolla / Riford Branch Library

Other

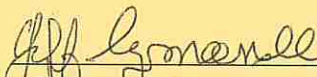
La Jolla Village News  
La Jolla Shores Association  
La Jolla Community Planning Association  
La Jolla Light  
Patricia Miller  
Neil Hyytinen  
Talon Powers

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

  
\_\_\_\_\_  
Jeff Szymanski  
Senior Planner  
Development Services Department

November 30, 2018  
Date of Draft Report

March 18, 2019  
Date of Final Report

Analyst: Courtney Holowach

Attachments: Initial Study Checklist  
Figure 1 – Location Map  
Figure 2 – Site Plan



## COMMENTS

## RESPONSES



RICHARD A. SCHULMAN  
E-Mail: rs@rasm@hechtsolberg.com

December 19, 2018

Via Electronic Mail (DSDEAS@sandiego.gov)

Courtney Holowach  
City of San Diego Development Services Center  
1222 First Avenue, MS 501  
San Diego, CA 92101

Re: **Abbott Residence CDP/SDP, Project No. 538814**  
**Project Site: 6340 Camino De La Costa**  
**Draft Negative Declaration**

Dear Ms. Holowach:

This firm represents Andrew and Monica Midler, who own the residence immediately north of the project site. I am commenting on the above-referenced negative declaration on behalf of the Midlers and their Moses Trust.

#### CEQA

A1

As the negative declaration itself acknowledges at length, the City has received a great deal of critical commentary from a geotechnical engineer indicating that the project could cause environmental harm. Courts have repeatedly held that this type of expert analysis renders negative declarations invalid under the fair argument standard. *E.g., Sierra Club v. California Department of Forestry and Fire Protection* (2007) 150 Cal.App.4th 370. According to this case law, the fact that the applicant or the City has found engineers who disagree is irrelevant; the City may not use a negative declaration. It must prepare an environmental impact report ("EIR") for the project.

A2

The issues in the EIR must include, among others, soil strength, safety, subsidence, managed retreat, and the nature (as a "bluff protection device") and role of the seawall. For your reference in preparing the EIR, I have attached copies of prior correspondence from this firm and of a recent report of our clients' geotechnical engineer. We may file an additional geotechnical report before the hearing on this matter.

#### Coastal Permit

A3

**Violation.** As the City is also aware (see enclosure #2), the applicant removed a mature tree from the site. This removal constituted "coastal development." MUNICIPAL CODE §113.0103, PUBLIC RESOURCES CODE §30106. However, the applicant did not bother to seek a coastal development permit first, leaving the site in violation of the Municipal Code and Coastal Act.

A-1

It is acknowledged that prior to the release of the draft Negative Declaration the City of San Diego (City) received the following correspondence:

**September 19, 2017:** Re: Abbott Residence SDP/CDP (Project No. 538814) 6340 Camino de la Costa, Neil S.Hyytinen of Hecht Solberg Robinson Goldberg & Bagley

**September 18, 2017:** Geotechnical/Bluff Recession Review, Geotechnical Exploration, Inc.

**March 30, 2018:** Re: Abbott Residence SDP/CDP (Project No. 538814) 6340 Camino de la Costa, Neil S.Hyytinen of Hecht Solberg Robinson Goldberg & Bagley

**August 28, 2018:** Cycle 6 California Coastal Commission and City of San Diego LDR – Geology and Planning Reviews, Geotechnical Exploration, Inc.

The comment letter on the Draft Negative Declaration included the March 30, 2018 and the August 28, 2018 correspondence as attachments. The attachments are addressed in responses number five through ten below.

The opposition claims that there is a fair argument that an Environmental Impact Report (EIR) must be prepared based upon these correspondences. CEQA Section 15064 states that an EIR is required "if there is a disagreement among expert opinion supported by facts over the significance of an effect on the environment, the Lead Agency shall treat the effect as significant and shall prepare an EIR." However, staff maintains that after reviewing the documentation provided by the opposition a fair argument based on substantial evidence has not been raised. The correspondence received only summarizes the City's review and analysis of the project and the California Coastal Commission's (CCC) comments on the project. The correspondence from the appellant does not identify a potential new effect nor does it disagree with the significance of this effect within the draft Negative Declaration.

The opposition has raised the issue of sea level rise; however, this is not an effect of the project on the environment but rather the environment on the project. Accordingly, the appellant failed to raise a fair argument that the project would result in a significant physical effect, and therefore, preparation an EIR is not required.

A-2

Soil strength and safety have been addressed in Section VI of the Negative Declaration. As discussed in Section VI, proper engineering design and utilization

## COMMENTS

## RESPONSES

Courtney Holowach, DSDEAS@sandiego.gov  
December 19, 2018  
Page 2

The City has a great deal of discretion in determining an appropriate remedy for this violation. MUNICIPAL CODE §12.0805, §121.0311, §121.0312. The relevant Code factors in this case are that the act was intentional, destroyed coastal resources, and was committed with no regard whatsoever for coastal resources. It would be extremely inappropriate for the City to ignore this violation by not requiring appropriate mitigation. Restoration – i.e., replacement of the tree with a native tree of comparable height – would be an appropriate mitigation measure.

A4

View. The negative declaration notes correctly that the applicant will have to grant an easement over the side yard setback. In order to ensure compliance with the City's view requirements, the easement must ensure that nothing opaque is placed there. Trash barrels are likely to block the view without a broad, clear prohibition in the easement document.

Thank you for the opportunity to comment.

Very truly yours,



Richard A. Schulman  
HECHT SOLBERG ROBINSON GOLDBERG & BAGLEY LLP

RAS:cas

Enclosures: (1) Letter dated March 30, 2018 from Neil Hyytinen to Glenn Gargas  
(2) Letter dated November 8, 2017 from Talon Powers to City Code Enforcement  
(3) Report dated August 28, 2018 from Geotechnical Exploration, Inc.

cc (by mail, w/encls.): California Coastal Commission  
Client

4820-3041-02197\_2

of standard construction practices would be verified at the construction permitting stage and would ensure that impacts in this category would not occur. Furthermore, the project is not located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code. Please refer to this section for further information. Subsidence, managed retreat, and the nature and role of a seawall are not significant effects of the project on the environment, rather, these are effects of the environment on the project. The opposition has offered no evidence of new effect of the project on the environment nor does it disagree with the significance of this effect. Please see response number one for further information regarding whether an EIR is necessary. Please see responses numbers five through ten regarding previous correspondence received.

A-3

Comment noted. The applicant's removal of a palm tree is not relevant to the adequacy of the environmental document.

A-4

Per the City of San Diego's CEQA Significance Determination Thresholds, projects that block public views from designated open space areas, roads, parks, significant visual landmarks or scenic vistas may result in a significant impact. City staff reviewed the proposed project for consistency with all applicable zoning regulations and land use plans including the La Jolla Community Plan (LJCP). The LJCP addresses the need to retain and enhance public views of the ocean from identified public vantage points. These vantage points include visual access across private properties at yards and setbacks. The Negative Declaration discloses that development of this project will introduce new permanent visual features to the community; and further, the LJCP has designated a view corridor through the project site. Therefore, a visual corridor of not less than the side yard setbacks or more than 10 feet in width, and running the full depth of the premises, shall be preserved as a deed restriction that will be included as a condition of project approval. The deed restriction must be provided to the City prior to issuance of the Coastal Development Permit per San Diego Municipal Code (SDMC) Section 132.0403(b). Compliance with this condition will ensure that any substantial adverse impacts on scenic vistas would be less than significant. The project complies with all height and setback requirements such that any non-designated vantage points will not be significantly altered. Since the project site is surrounded by existing residential development, will preserve designated view corridors via a deed restriction, and is consistent with all applicable zoning regulations, all public view impacts will be less than significant.



NIGEL S. HYTTINEN  
E-Mail: nhyttinen@hechtsolberg.com

March 30, 2018

Via Electronic Mail (GGargas@sandiego.gov)

Glenn Gargas  
Project Manager, Development Services Department  
City of San Diego  
1222 First Avenue, MS  
San Diego, CA 92101

Re: Abbott Residence (CDP/SDP Project No. 538814)  
6340 Camino De La Costa

Dear Glenn:

As you know, we represent Andrew and Monica Midler, who own the residence immediately north of the project site. I am writing to comment on the geotechnical analysis for the above-referenced project.

Based upon our review of the various geotechnical reports (see enclosed reference list), and in consultation with engineering and geotechnical experts, we offer the following comments:

A5

1. The site plan did not map the visible sea cave near the southwest corner of the property. The determination of the location of the bluff top did not include the landward limit of the sea cave along Section D-D'. The sea cave appears to be enlarging based on comparisons between the 1972 and 2013 aerial photos and it appears that the crack in the bedrock visibly traverses onto the property. Is this crack evidence of a fault? If so it should be shown on the site plan and evaluated.

Attached the 1972 and 2013 aerial photos of the site and a blown up 2013 of the "fault" area (Source: Reference 7).

2. The reports provided did not include the boring and/or test pit data/logs that verified the surficial soil type in the vicinity of the bluff top. The geotechnical report used data from a previous investigation for the property from a Coastal Development Permit application for the property that was initiated in the early 2000's but subsequently abandoned and closed out. Although the previous report by Geotechnical Explorations Inc. (GEI) identified the top and the bluff, the City did not sign-off on the report or approve any determination as to the location of the top of the bluff.

3. The delineation of the top of the bluff does not appear to be in conformance with the City Guidelines (Reference 4, page 17). In particular, along sections B-B' and C-C' the bluff top appear

HechtSolberg Robinson Goldberg & Bagley LLP Attorneys at Law  
One America Plaza 600 West Broadway Suite 800 San Diego, CA 92101 T: 619.239.3444 F: 619.232.6828 hechtsolberg.com

A-5

As discussed above, here there is no fair argument based on substantial evidence that the Abbott project will have a significant impact on the environment. The issues related to bluff top determination, the "coastal protection device", and the determination of the allowable building setback do not illustrate an effect of the project on the environment. Rather, this March 30, 2018 correspondence posits opinions on the requirements of the City's analysis. Furthermore, the correspondence does not set forth any independent conclusions that the Abbott project will have a significant effect on the environment. However, despite this correspondence not raising any issues of the effect of the project on the environment, the applicant provided a response to this letter (Geotechnical Response to Letter Dated March 30, 2018, Christian Wheeler, July 2018). The Christian Wheeler report offers responses to all the comments provided. The comment letter fails to include evidence that the Abbott project will have a significant impact on the environment.

March 30, 2018  
Page 2

- A5 more seaward than the Guidelines would determine. They appear to delineate the bluff top seaward of the actual bluff top.
4. In the applicant's response to City Cycle Issue 17 (*see Reference 2*), the consultant argues that the existing bluff top wall is not a protective device. As defined by the California Coastal Commission, "protective device" means any type of device, measure, or structure constructed in or on a coastal cliff or bluff which is intended to preserve and protect the coastal cliff or bluff from the effects of erosion (*Reference 6*). The existing wall was constructed both seaward and landward of the bluff top prior to 1972, over 46 years ago. Since the time of construction, particularly in the areas where the device is at or seaward of the bluff top, the wall has prevented erosion.
- In the applicant's response to City Cycle Issue 19 (*see Reference 2*), the consultant determined an erosion rate of about 17 feet in 75 years or a rate of ~0.23 ft/yr. If the retaining wall had NOT been in place seaward of the bluff for the last approximately 50 years the bluff would have eroded approximately 11.3 feet. The retaining wall is located on a bluff top and the project geotechnical consultant has established that the bluff is eroding.
- This makes the retaining wall a "protective device" by definition and, as such, the project must adhere to the minimum 40-foot bluff top setback for development.
- This conclusion is supported by the City's Development Regulations for Sensitive Coastal Bluffs and the Coastal Bluffs and Beaches Guidelines. As stated in the Development Regulations, the exception to the 40-foot setback is only appropriate if "no shoreline protection is required ... and will not require construction of shoreline protection measures throughout the economic life span of the structure (*Reference 4, LDC Section 143.0143(f)(1)*). As stated in the Guidelines, "[i]f a seawall (or other stabilization/erosion control measure) has been installed due to excessive erosion on a premises, that premises shall not qualify for a reduction of the required 40-foot distance to the coastal bluff edge" (*Reference 4, Guidelines, Section II, C*).
5. The project proposes substantial improvements and development, including adding a second story and relocating the western elevation of the residence. The project should not rely on the existing previously conforming development, particularly the bluff top and bluff face retaining wall that serves as a protective device and the other access improvements on the bluff face.
- In addition, the project needs to be evaluated over the life of the development which is 75 years. The geotechnical consultant has determined that the bluff top erosion for the next 75 years is approximately 17 feet. This indicates that any existing or proposed improvement that is within 17 feet will be impacted by erosion, which precludes the required project finding that the development is safe over the next 75 years.

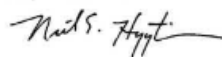
COMMENTS

RESPONSES

March 30, 2018  
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Thank you for your attention to this matter.

Very truly yours,



Neil S. Hyytinen  
HECHT SOLBERG ROBINSON GOLDBERG & BAGLEY LLP

NSH

Enclosures

cc: California Coastal Commission  
Andrew Midler

4828-3041-0209 x.1



List of References

We have reviewed the following documents and obtained information from the following websites.

1. Preliminary Geotechnical Investigation Proposed Abbott Residence Additions, by Christian Wheeler, dated May 30, 2017.
2. Addendum Geotechnical Report, by Christian Wheeler, dated January 27, 2018.
3. Site Plans and Sections Abbott Residence, by Matrix Design Studio, dated February 23, 2017.
4. San Diego Municipal Code, Land Development Code, Coastal Bluffs and Beaches Guidelines.
5. Power Point Presentation to La Jolla Community, dated July 18, 2017.
6. California Coastal Commission Website, <https://www.coastal.ca.gov/index.html>
7. California Coastal Records Website <http://www.californiacoastline.org/>
8. City of San Diego Cycle Issues, Project 538814, Abbott Residence, dated January 5, 2018.

COMMENTS

RESPONSES

1972 Site Photo



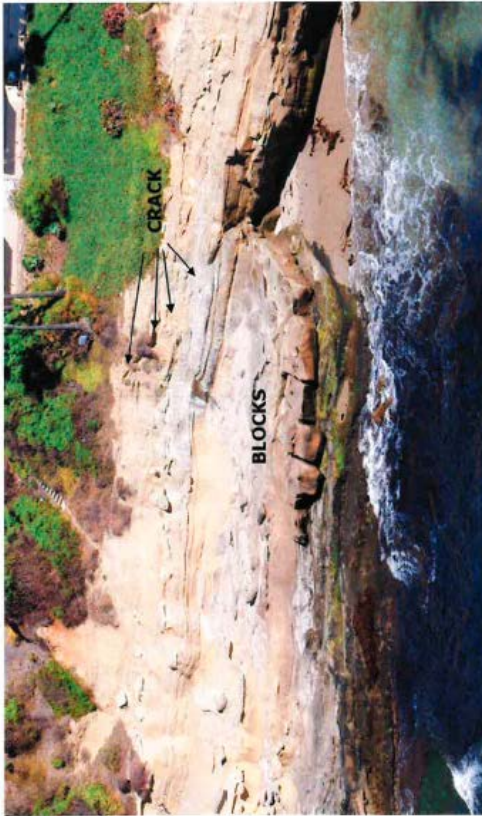
COMMENTS

RESPONSES

2013 Site Photo



2013 Site Photo Close Up



1972-2013 Comparison







TALON J. POWERS  
E-Mail: tpowers@hechtsolberg.com

November 8, 2017

**Via U.S. Mail**

City of San Diego  
Code Enforcement Division  
Development Services Department  
1222 1st Avenue, 5th Floor, MS-511  
San Diego, CA 92101-4101

**Re: Code Enforcement Request for Investigation Concerning Violations of the San Diego Municipal Code at 6340 Camino De La Costa, La Jolla, California 92037**

A6

Dear Code Enforcement Staff:

We represent Andrew and Monica Midler (the "Midlers"), who reside at the property located at 6350 Camino De La Costa, La Jolla, California 92037 (the "Midler Property"). We would request that you investigate violations of the San Diego Municipal Code which have taken occurred at 6340 Camino De La Costa, La Jolla, California 92037 (the "Abbott Property"), a property owned by the family trust of Roger and Rosalind Abbott (the "Abbotts") which neighbors the Midler Property.

Specifically, the Abbotts are bound by Coastal Development Permit 41-0068, which governed additions to their home of a recreation room and a lanai pool. Condition 25 of this Coastal Development Permit requires that "[a]ll fences and retaining walls shall comply with the San Diego Municipal Code Section 142.0301." The fences have not been adequately and appropriately maintained as required under this development condition as they do not meet the requirements of Section 142.0301.

Further, the Abbotts have removed a palm tree which sat on the boundary between the Abbott Property and the Midler Property in addition to removing vegetation which ran the length of their yard into the coastal bluff area. Such removal violates San Diego Municipal Code Section 126.0704(a)(4), which requires a Coastal Development Permit for "[a]ny significant alteration of land forms including removal or placement of vegetation . . . within 100 feet of the edge of a coastal bluff." No such Coastal Development Permit was sought or procured by the Abbotts, and they continue to alter the vegetation within this coastal bluff area through the present.

Finally, the supplemental restrictions found in San Diego Municipal Code Section 132.0403 have also been violated by development on the Abbott Property. Section 132.0403(a) requires that existing or potential public views must be protected, and that coastal development must preserve, enhance, or restore the designated public view. Section 132.0403(b) further requires that a visual corridor of not less than the side yard setbacks running the full length of the premises shall be preserved where the development is located on "premises that lies between the shoreline and the first public roadway" and the "visual corridor is feasible and will serve to preserve, enhance or restore

Hecht Solberg Robinson Goldberg & Bagley LLP Attorneys at Law  
One America Plaza 600 West Broadway Suite 800 San Diego, CA 92101 T: 619.239.3444 F: 619.232.6828 hechtsolberg.com

A-6

As mentioned above the code enforcement action is not relevant to the adequacy of the environmental document.

November 8, 2017  
Page 2

public views of the ocean or shoreline". Section 132.0403(e) provides that open fencing and landscaping may only be permitted within such view corridors and visual accessways where they "do not significantly obstruct public views of the ocean."

The Abbott Property, which is situated on scenic Camino De La Costa, fits within these view zone requirements, and yet the landscaping and fencing on the Abbott Property restricts any such visual corridor to the ocean or shoreline. Further, the closed fencing used is not permitted as per Section 132.0403(e). While Coastal Development Permit 41-0068 does not appear to include any specific deed restriction, the Abbott Property was developed under these relevant portions of the San Diego Municipal Code, which would seem to require that such a visual corridor be preserved.

Photographs of the relevant violations, along with a copy of the City of San Diego Request for Investigation Form, are enclosed with this letter. Do not hesitate to follow up with me directly with any questions concerning this Code Enforcement Request.

Very truly yours,



Talon J. Powers  
HECHT SOLBERG ROBINSON GOLDBERG & BAGLEY LLP

TJP/tp

Enclosures

4831-3138-6431 v.2

## Code Enforcement

### Request for Investigation Form

NOTE: Code Enforcement does not enforce the noise code when the alleged violator and the complainant live in the same apartment or condominium complex. We suggest you utilize your complex manager, homeowner association, mediation services, or the civil courts to resolve your dispute.

**Fill out as completely and accurately as possible. The more information available, the better service we can provide.**

**IMPORTANT: We must have correct address of the violation.**

(\* indicates required field)

#### Investigation Type

- ☐ Noise
- ☒ Land Dev
- ☐ Bldg Code Enf
- ☐ Housing
- ☐ Weeds
- ☐ Signs
- ☐ Zoning

#### Violation Property

Address \*

6340 Camino De La Costa

Apt or Unit #

Zip/Postal Code \*

92037

## COMMENTS

## RESPONSES

Cross Street

## Violation Property Contact

Name

Contact Type

- ☒ Owner
- ☐ Agent/Manager/Responsible Party
- ☐ Tenant/Lessee

Daytime Phone

Address

City

State

Zip Code

## Alleged Violation: \*

The Abbotts are bound by Coastal Development Permit 41-0068, which governed additions to their home of a recreation room and a lanai pool. Condition 25 of this Coastal Development Permit requires that "[a]ll fences and retaining walls shall comply with the San Diego Municipal Code Section 142.0301." The fences have not been adequately and appropriately maintained as required under this development condition as they do not meet the requirements of Section 142.0301.

Further, the Abbotts have removed a palm tree which sat on the boundary between the Abbott Property and the Midler Property in addition to removing vegetation which ran the length of their yard into the coastal bluff area. Such removal violates San Diego Municipal Code Section 126.0704(a)(4), which requires a Coastal Development Permit for "[a]ny significant alteration of land forms including removal or placement of vegetation . . . within 100 feet of the edge of a coastal bluff." No such Coastal Development Permit was sought or procured by the Abbotts.

and they continue to alter the vegetation within this coastal bluff area through the present.

Finally, the supplemental restrictions found in San Diego Municipal Code Section 132.0403 have also been violated by development on the Abbott Property. Section 132.0403(a) requires that existing or potential public views must be protected, and that coastal development must preserve, enhance, or restore the designated public view. Section 132.0403(b) further requires that a visual corridor of not less than the side yard setbacks running the full length of the premises shall be preserved where the development is located on "premises that lies between the shoreline and the first public roadway" and the "visual corridor is feasible and will serve to preserve, enhance or restore public views of the ocean or shoreline". Section 132.0403(e) provides that open fencing and landscaping may only be permitted within such view corridors and visual accessways where they "do not significantly obstruct public views of the ocean."

The Abbott Property, which is situated on scenic Camino De La Costa, fits within these view zone requirements, and yet the landscaping and fencing on the Abbott Property restricts any such visual corridor to the ocean or shoreline. Further, the closed fencing used is not permitted as per Section 132.0403(e). While Coastal Development Permit 41-0068 does not appear to include any specific deed restriction, the Abbott Property was developed under these relevant portions of the San Diego Municipal Code, which would seem to require that such a visual corridor be preserved.

**Residential Property**

- ☒ Single Family
- ☐ Duplex
- ☐ Multifamily
- ☐ Other

Is this a rental property? \*

- ☐ Yes
- ☒ No
- ☐ Unknown

Is there any drug activity at this site? \*

- ☐ Yes
- ☐ No
- ☒ Unknown

Are there loose pets at the site? \*

- ☐ Yes
- ☒ No



○ Unknown

**Complainant**

Name \*

Andrew and Monica Midler

Address \*

6350 Camino De La Costa

City \*

La Jolla

Zip Code \*

92037

Daytime Phone \*

(858) 812-2937

Email

Language Spoken \*

English

**Photo Attachment**

Only one (1) photo can be attached.

Upload Photo

Files must be less than 5 MB.

Allowed file types: gif jpg jpeg png.

Choose File No file chosen

1. The responsible person will be notified of the concern and appropriate enforcement action will proceed. We have found that most people will begin corrective action as soon as they receive the first notice.
2. The average response time is 1 to 30 days, depending on the type of complaint.





COMMENTS

RESPONSES





COMMENTS

RESPONSES





COMMENTS

RESPONSES



COMMENTS

RESPONSES





## Geotechnical Exploration, Inc.

SOIL AND FOUNDATION ENGINEERING • GROUNDWATER • ENGINEERING GEOLOGY

28 August 2018

Mr. Andrew Midler  
6350 Camino de la Costa  
La Jolla, CA 92037

**Job No. 00-7928**

**Subject:** Cycle 6 California Coastal Commission and City of San Diego  
LDR – Geology and Planning Reviews  
Proposed Abbott Residence Addition  
6340 Camino de la Costa  
La Jolla, California

A7

Dear Mr. Midler:

In accordance with your request, **Geotechnical Exploration, Inc.** has completed our review of the City of San Diego and California Coastal Commission Cycle 6 Review (completion date June 11, 2018). We have also reviewed the response to the LDR-Geology review by Christian Wheeler Engineering (CWE) dated June 4, 2018. The LDR-Geology Issues #19, #25 and #26 addressed historic and predicted bluff edge recession rates, requested that historic photographic and topographic map evidence utilized in the analyses be provided, and requested a description of the methodologies utilized to determine historic bluff edge locations and determine a proposed 25-foot setback to protect the proposed project through its anticipated useful life of 75 years without the need for shoreline protection.

We assume the Cycle 6 CWE response dated June 4, 2018, will be or has been submitted for a Cycle 7 Review by the California Coastal Commission and the City of San Diego LDR-Geology to determine if their response adequately addresses Issues #19, # 25 and #26.

7420 TRADE STREET • SAN DIEGO, CA. 92121 • (858) 549-7222 • FAX: (858) 549-1604 • EMAIL: geotech@gei-sd.com

A-7

The August 28, 2018 GEI (Cycle 6 California Coastal Commission and City of San Diego LDR-Geology and Planning Reviews, Geotechnical Exploration, Inc.) report correspondence summarizes the City's review and analysis of the project as well as the CCC's comments on the project. Again, this correspondence offers no evidence or opinion regarding the adequacy of the environmental document.

6340 Camino de la Costa  
La Jolla, California

Job No. 00-7928  
Page 2

A7

**Seaward and Near-Bluff Edge Construction Limitations**

In addition to the LDR-Geology and California Coastal Commission Cycle 6 review, we have reviewed the bluff edge issues #20, #23 and #25 addressed in the LDR - Planning Cycle 6 review completion dated February 23, 2018.

As part of the Cycle 6 (Multi-Discipline) Review, the California Coastal Commission review raises issues concerning the western retaining wall, a significant portion of which was constructed seaward of the bluff edge on fill soils that had been placed over the bluff face. Issue #17 shown on the LDR-Geology Cycle 6 Review as a Cycle 5 Issue is shown to be cleared, suggesting response to the issue has been accepted. Issue #17 stated "The referenced geotechnical reports indicate that portions of the existing wall are seaward of the bluff edge. Clarify if the wall may be considered to be a coastal protective device. (From Cycle 5)"

The California Coastal Commission Cycle 6 comments clearly and strongly address the LDR-Geology Cycle 5, Issue #17 concerning the existence of the retaining wall bearing on fill soils seaward of the bluff edge.

Issues #7, #8 and #9 state:

7. Commission staff has further reviewed and discussed the information submitted for the Abbott residence in La Jolla. Upon further review, Commission staff finds the bluff edge delineation submitted by the applicant to be acceptable. Relatedly, the bluff edge delineation shows a portion of the existing rear retaining wall seaward of the bluff edge, retaining fill partially burying the natural bluff face. Commission staff believes the portion of the wall and fill located seaward of the bluff edge is previously conforming development and acts as shoreline protection, as it obscures the (cont.) (New Issue)
8. (cont.) the natural bluff face and disrupts natural processes, protecting the bluff from natural erosive forces such as wind and rain. Thus, so long as the wall and fill are located seaward of the bluff edge, Commissions staff will view it as shoreline protection that requires a default 40-ft setback.



6340 Camino de la Costa  
La Jolla, California

Job No. 00-7928  
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If the applicant wishes to utilize a 25-ft. setback, they should modify their project to include the removal of all portions of the retaining wall and fill located seaward of the delineated bluff edge. Furthermore, the property will require the recordation of a waiver of future (cont.) (New Issue)

9. (cont.) shoreline protection on the property.

The Coastal Commission Cycle 6 response restates the #7, #8 and #9 information as Issues #10, #11 and #12.

As stated under Issue #7, the Commission staff does accept the bluff edge delineation submitted by the applicant. However, they immediately express their concerns about the existence of the wall and fill located seaward of the bluff edge and state "Commission staff believes the portion of the wall and fill located seaward of the bluff is previously conforming development and acts as shoreline protection, as it obscures the natural bluff face and disrupts natural processes, protecting the bluff from natural erosive forces such as wind and rain." They then conclude "Thus, so long as the wall and fill are located seaward of the bluff edge, Commissions staff will view it as shoreline protection that requires a default 40-ft setback."

The Commission then gives direction as to how the Applicant can retain and use the 25-foot setback by removing the wall and fill seaward of the bluff edge. "If the applicant wishes to utilize a 25-ft. setback, they should modify their project to include the removal of all portions of the retaining wall and fill located seaward of the delineated bluff edge. Furthermore, the property will require the recordation of a waiver of future shoreline protection on the property."

As stated previously, the #7, #8 and #9 comments are repeated in #10, #11 and #12 of the Commissions Cycle 6 response.





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The LDR – Planning Cycle 5 review also addresses bluff edge requirements in Issues #20, #23 and #25.

Issue #20 states "1) that the applicant understands that no new accessory structures and landscape features customary and incidental to residential uses shall be developed within five feet of the bluff top or on the face of the bluff. (From Cycle 5)"

Issue #23 states "No current or future development shall be permitted on the coastal bluff face or within 5 feet of the coastal bluff edge. All encroaching non-native vegetation, landscaping, and structures including, but not exclusive to, fences, stairs, and accessory buildings; currently existing on the coastal bluff face or within 5 feet of the bluff edge shall be removed and the land returned to its native state. (New Issue)"

Issue #25 states "At grade accessory structures and landscape features customary and incidental to residential uses shall not be closer than five feet to the coastal bluff edge, in accordance with the requirements of the Land Development Code. (From Cycle 5)"

Issues #20, #23 and #25 **all** address near-bluff edge construction limitations. While Issue #20 refers to no **new** accessory structures, etc., Issue #25 makes a broader statement "At grade accessory structures and landscape features customary and incidental to residential uses shall not be closer than five feet to the coastal bluff edge, in accordance with the requirements of the Land Development Code." There is no reference to new.

Issue #23 (from Cycle 5) not only refers to the prohibition of development on or within 5 feet of the coastal bluff edge but goes on to require removal. The second sentence of Issue #23 states "All encroaching non-native vegetation, landscaping,



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and structures including, but not exclusive to, fences, stairs, and accessory buildings; currently existing on the coastal bluff face or within 5 feet of the bluff edge shall be removed and the land returned to its native state."

Given the above Coastal Commission clear determination and statement that the retaining wall will be considered shoreline protection and must be removed in order for the Applicant to utilize a 25-foot bluff edge setback, existing site plans and subsurface investigation documents by CWE and GEI, as well as possibly additional exploratory work, should be used to analyze the subsurface conditions at the wall location and determine what will be required to move the wall to an acceptable location at least 5 feet landward of the bluff edge.

CWE produced an "Addendum to Report of Geotechnical Investigation, Proposed Abbott Residence Additions..." dated June 19, 2018. This report addresses foundation issues for the residential additions but does not address geotechnical design criteria related to the relocation and reconstruction of the retaining wall as required by the Coastal Commission. We assume that an Addendum Report addressing the wall relocation issue will be required from CWE.

A9

Some of the issues to be addressed in the wall relocation geotechnical addendum would be as follows:

-- Based on bluff edge mapping by CWE and GEI (2000) it appears that approximately 40 feet of the existing wall would have to be removed and relocated at least 5 feet landward of the bluff edge and far enough behind the bluff edge to allow for adequate foundation design and embedment. The final wall length requiring removal should be determined by CWE using existing and possibly additional subsurface information.



A-8

The applicant has provided responses to both the City and the CCC. Both the City and the CCC have determined that the applicant's responses have adequately addressed the site conditions potentially affecting the proposed project. The correspondence does not set forth any independent opinions or conclusions that serves as substantial evidence that the Abbott project will have a significant impact on the environment. The CCC raised concerns over the existing sea wall, the City allowing a 25-foot setback, and the effect of sea level rise on the proposed project. All the CCC's comments have been addressed. (See October 19, 2018 correspondence from Coastal Program Analyst A. Llerandi.) For further information, please see response number nine.

A-9

Comment noted. The proposed development includes the demolition of all portions of the existing single-family residence located closer than 25 feet to the bluff edge. The existing 110-ft rear yard wall will be retained in its previously conforming configuration. The majority of the wall is located landward of the designated bluff edge, and the wall itself does not contain any deep footings or caissons either on or behind the bluff. The wall is not retaining any of the bluff material, but rather only supports the fill in the rear yard area. Finally, the existing residence and the proposed project are not expected to rely on the rear wall for geological support in the future. As mentioned above the opposition again offers no evidence or opinion regarding the significance of an effect on the environment. In addition, all the CCC's comments have been addressed (See October 19, 2018 correspondence from Coastal Program Analyst A. Llerandi). As requested by the CCC in that letter, the project will be conditioned to ensure that no work to the rear wall is included in the proposed residential remodel. No alteration, modification, or expansion of the rear wall would be authorized by this permit. The project will also include conditions that should the wall be undermined at any future point, the wall would be removed. The combination of the fact that both the existing residence and the proposed residence are not expected to rely on the rear wall for geological support and the addition of the appropriate conditions and findings will ensure that the proposed development will minimize the alterations of natural landforms and will not result in undue risks from geologic, erosional forces and/or flood and fire hazards. In addition, please see comments number 7 and number 8.

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- Based on investigative work by GEI (2000), Figure No. IIa showing the test trench T-1 was prepared and provided to the City to review in the GEI document "Response to Review of Top-of-Bluff Mapping", dated September 26, 2000. We consider Figure No. IIa, provided as Appendix A, to be an accurate representation of the retaining wall, underlying fill and bluff edge and face configuration at the trench T-1 location on cross-section A-A'. As depicted on the graphic, the wall alignment at the T-1 location is approximately 5 feet seaward of the bluff edge. A new wall and foundation would have to be set back 5 feet from the bluff edge as described in the LDR - Planning Cycle 6 Issues #20 and #25. In order to meet the 5-foot from bluff edge to yard area improvement and foundation requirement of the Land Development Code, the wall would have to be moved approximately 10 feet landward of the current wall alignment at the cross section A-A' location.
- Based on the CWE A-A' cross section on the CWE Plate 2 figure dated November 2017, it appears approximately 10 feet of fill soil underlies the portion of the wall at the location on cross section A-A'.
- Coastal Commission or City of San Diego LDR-Geology staff should provide direction on how much old fill soil removal should take place during or following wall removal and relocation to re-expose the currently buried natural bluff face. Based on cross section A-A' by CWE, fill soil thicknesses up to 16 to 18 feet extend over the bluff face down to elevation 20 feet (MSL) along cross section A-A'.

A10

**Sea Level Rise COSMOS Modeling**

On the Cycle 5 LDR-Geology review (completion date 11/28/2017), Issue #9 from the Cycle 4 review addressing sea level rise was checked off suggesting the response to the Cycle 4 review was accepted. Issue #9 states "Please address rising sea levels



A-10 Again, this comment is summarizing the City's review and analysis of the project as well as the California Coastal Commission's (CCC) comments on the project. The correspondence offers no evidence or opinion regarding the significance of an effect on the environment. The correspondence raises issues related to sea level rise and the modeling the applicant used to determine sea level rise. This is the effect the of environment on the project rather than the effect of the project on the environment. However as stated above, all the CCC's comments have been addressed (See October 19, 2018 correspondence from Coastal Program Analyst A. Llerandi).

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with respect to "California Coastal Commission Sea Level Rise Policy Guidance, Interpretive Guidelines for Addressing Sea Level Rise in Local Coastal Programs and Coastal Development Permits," adopted August 12, 2015. (From Cycle 4)"

As stated, the Issue #9 request was to address the referenced Coastal Commission document/policy on rising sea levels. However, in the same Cycle 5 document a new issue, Issue #21, is presented concerning bluff retreat rate, long-term stability, and rising sea levels. Issue #21 states "In addition, the geotechnical consultant should address the difference between bluff retreat rate, long term stability and rising sea levels presented in their geotechnical reports with respect to the COSMOS model used by the California Coastal Commission."

This request for response from the Consultant refers to the COSMOS model used by the Coastal Commission. The sea level rise elements and applications of the COSMOS model are not necessarily the same as the previously referenced California Coastal Commission policy document addressing sea level rise in local coastal programs and coastal development permits. The request to address the COSMOS model was presented as a separate Issue #21.

The COSMOS modeling Issue #21 of LDR-Geology was derived from the Coastal Commission Cycle 5, Issue #5, 2) which states "With regard to bluff retreat rate and long-term stability of the site, there is a discrepancy between the predicted future retreat rate put forward by the PGI and what is expected to occur on-site according to COSMOS modeling." The Coastal Commission Issue #5, 2) concludes with "Please address the discrepancy and explain why the data put forward in the PGI is different from the COSMOS model."

In the Cycle 6 LDR-Geology Review (completion dated 2/21/2018), Issue #21 requesting the differences between the Consultants geotechnical reports and the COSMOS model be addressed, has been checked indicating acceptance by LDR-

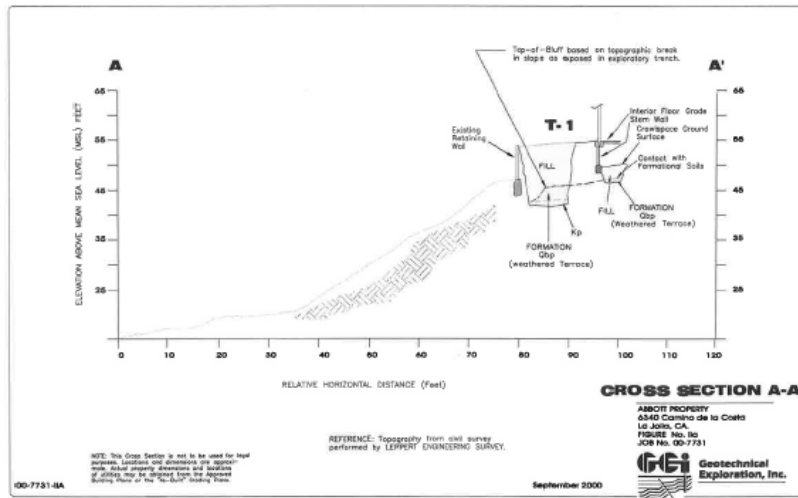


COMMENTS

RESPONSES

**APPENDIX A**







## INITIAL STUDY CHECKLIST

1. Project title/Project number: Abbott Residence CDP SDP / 538814
2. Lead agency name and address: City of San Diego, 1222 First Avenue, MS-501, San Diego, California 92101
3. Contact person and phone number: Courtney Holowach / (619) 446-5187
4. Project location: 6340 Camino de la Costa, La Jolla, CA 92037
5. Project Applicant/Sponsor's name and address: Roger Abbott, 6340 Camino de la Costa, La Jolla, CA 92037
6. General/Community Plan designation: La Jolla Community Plan
7. Zoning: RS-1-5
8. Description of project (Describe the whole action involved, including but not limited to, later phases of the project, and any secondary, support, or off-site features necessary for its implementation.):

Coastal Development Permit (CDP) and Site Development Permit (SDP) for a proposed 214 square foot addition to the main level and a 3,488 square foot addition to the second story of an existing residential single dwelling unit. The project site has two detached garages and the northern garage would be remodeled to include a 359 square foot office. An additional 309 square feet would be added to the existing south garage. There would be a total of 4,370 square feet of new construction for a total of 11,731 square feet of development. Existing landscaping, basement and pool would remain. Two existing garages providing four off street parking places would remain.

All new construction would be built on existing impervious surfaces, and new foundation work would be minimal. Existing landscaping and irrigation would remain. There are no proposed changes in landscaping and existing soils would not be disturbed. The proposed project would not alter drainage patterns on the site. Runoff previously drained to Camino de la Costa would continue to do so. There would be no increase to the amount of impervious area since construction would only occur on existing impervious areas. The peak flow rate would not increase therefore there is no change in runoff quantity of quality. All existing complying street trees would remain. No work is proposed in the public right of way. No development regulation deviations are proposed.

9. Surrounding land uses and setting:

The proposed project is located at 6340 Camino De La Costa. The 1.37-acre site is in the Coastal (Appealable) overlay zone within the RS-1-5 base zone in the La Jolla Community Plan area. Also, it is located within the First Public Roadway, Sensitive Coastal Overlay Zone, Coastal Height Overlay Zone, and Parking Impact Overlay Zone - Beach. The Pacific Ocean is

located directly to the west of the proposed project site. Existing development surrounds the proposed project to the north, south, and east.

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

California Coastal Commission

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

Yes, two Native American Tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1. The City of San Diego sent notification to these two Native American Tribes on July 19, 2017. Both the Lipay Nation of Santa Ysabel and the Jamul Indian Village responded within the 30-day period requesting consultation and additional information. Consultation was conducted and concluded on Nov. 13 2017. Please see Section XVII of the Initial Study for more information regarding the consultation.

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

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> Aesthetics                         | <input type="checkbox"/> Greenhouse Gas Emissions      | <input type="checkbox"/> Population/Housing              |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Public Services                 |
| <input type="checkbox"/> Air Quality                        | <input type="checkbox"/> Hydrology/Water Quality       | <input type="checkbox"/> Recreation                      |
| <input type="checkbox"/> Biological Resources               | <input type="checkbox"/> Land Use/Planning             | <input type="checkbox"/> Transportation/Traffic          |
| <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Mineral Resources             | <input type="checkbox"/> Tribal Cultural Resources       |
| <input type="checkbox"/> Geology/Soils                      | <input type="checkbox"/> Noise                         | <input type="checkbox"/> Utilities/Service System        |
|   |  | <input type="checkbox"/> Mandatory Findings Significance |

**DETERMINATION: (To be completed by Lead Agency)**

On the basis of this initial evaluation:

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

## EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis.)
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses”, as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or (mitigated) negative declaration. *Section 15063(c)(3)(D)*. In this case, a brief discussion should identify the following:
  - a. Earlier Analysis Used. Identify and state where they are available for review.
  - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated”, describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
  - a. The significance criteria or threshold, if any, used to evaluate each question; and
  - b. The mitigation measure identified, if any, to reduce the impact to less than significant.

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

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Per the City of San Diego CEQA Significance Determination Thresholds (Thresholds) projects that would block public views from designated open space areas, roads, or parks or significant visual landmarks or scenic vistas may result in a significant impact. City staff reviewed the proposed project for consistency with all applicable zoning regulations and land use plans including the La Jolla Community Plan (LJCP). The LJCP addresses the need to retain and enhance public views of the ocean from identified public vantage points. These vantage points include visual access across private properties at yards and setbacks. Development of the project would introduce new permanent visual features to the community; additionally, the LJCP has designated a view corridor through the project site or adjacent to it. Therefore, a visual corridor of not less than the side yard setbacks or more than 10 feet in width, and running full depth of the premises, shall be preserved as a deed restriction as a condition of the Coastal Development Permit per San Diego Municipal Code (SDMC) Section 132.0403(b). Compliance with this permit condition will ensure that a substantial adverse effect on a scenic vista would not occur. The project is maintaining all height and setback requirements so non-designated vantage points would not be significantly altered. Therefore, since the project site is surrounded by existing residential development, is preserving designated view corridors, and is consistent with all applicable zoning regulations all impacts would be less than significant.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

There are no designated scenic resources such as trees, rock outcroppings or historic buildings within a state scenic highway within the project's boundaries. No impact would result due to implementation of the project.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Substantially degrade the existing visual character or quality of the site and its surroundings? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

According to the Thresholds projects that severely contrast with the surrounding neighborhood character may result in a significant impact. To meet this significance threshold one or more of the following conditions must apply: the project would have to exceed the allowable height or bulk regulations and the height and bulk of the existing patterns of development in the vicinity of the project by a substantial margin; have 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); result in the physical loss, isolation or degradation of a community identification symbol or landmark (e.g., a stand of trees, coastal bluff, historic landmark) which is identified in the General Plan, applicable community plan or local coastal program; be located in a highly visible area (e.g., on a canyon edge, hilltop or adjacent to an interstate highway) and would strongly contrast with the surrounding development or natural topography through excessive height, bulk signage or architectural projections; and/or the project would have a

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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cumulative effect by opening up a new area for development or changing the overall character of the area.

Existing development in the neighborhood does not have a unifying theme of architecture. The new development would be constructed to comply with all height and bulk regulations and is consistent with Visual Resource recommendations as outlined in the LJC. The structure height is consistent with building envelope regulations which preserve public views through the height, setback, landscaping, and fence transparency parameters of the Land Development Code that limit the building profile and maximize view opportunities. The project would not result in the physical loss, isolation or degradation of a community identification symbol or landmark which is identified in the General Plan, applicable community plan or local coastal program. Therefore, the project would not substantially degrade the existing visual character or the quality of the site and its surroundings. No impact would result due to implementation of the project.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. The project would not be predominately constructed with light reflective material and all lighting would be required to be shaded and adjusted to fall on the project's site as required in the City's municipal code. In addition, the project would not be located adjacent to a light-sensitive property and therefore the single dwelling unit would not create a substantial light or glare impact. The project would also be subject to the City's Outdoor Lighting Regulations per Municipal Code Section 142.0740. No impact would result due to implementation of the project.

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

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Converts Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is classified as Urban and Built-Up Land by the Farmland Mapping and Monitoring Program (FMMP). Similarly, the land surrounding the project site is not in agricultural production and is not classified as farmland by the FMMP. Therefore, the proposed project would not convert farmland to non-agricultural uses. No impact would result due to implementation of the project.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|



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

The proposed project is not currently zoned for agricultural use, is not under a Williamson Act Contract nor is any surrounding land under a Williamson Act Contract. No impacts would result due to implementation of the proposed project.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

No land within the LJCP is designated as forest land or timberland. Therefore, the project would not conflict with existing zoning forest land. No impact would result due to implementation of the project.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is located within a largely developed and urbanized area of the City and is not designated as forest land. Therefore, the project would not convert forest land to non-forest use. No impact would result due to implementation of the project.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

No existing agricultural uses are located in the proximity of the project area that could be affected. Therefore, the project would not convert farmland to non-agricultural uses or forestland to non-forest use. No impact would result due to implementation of the project.

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

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The San Diego Air Pollution Control District (SDAPCD) and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the San Diego Air Basin (SDAB). The County Regional Air Quality Strategy (RAQS) was initially adopted in 1991 and is updated on a triennial basis (most recently in 2009). The RAQS outlines the SDAPCD's plans and control measures designed to attain the state air quality standards for ozone (O3). The RAQS relies on information from the California Air Resources Board (CARB) and SANDAG, including mobile and area source emissions, as

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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well as information regarding projected growth in San Diego County and the cities in the county, to project future emissions and then determine the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by San Diego County and the cities in the county as part of the development of their general plans.

The RAQS relies on SANDAG growth projections based on population, vehicle trends, and land use plans developed by the cities and by the county as part of the development of their general plans. As such, projects that propose development that is consistent with the growth anticipated by local plans would be consistent with the RAQS. However, if a project proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might conflict with the RAQS and may contribute to a potentially significant cumulative impact on air quality.

The project would remodel an existing single dwelling unit within a developed neighborhood of similar residential uses. The project is consistent with the General Plan, Community Plan, and the underlying zoning for residential development. Therefore, the project would be consistent at a sub-regional level with the underlying growth forecasts in the RAQS, and would not obstruct implementation of the RAQS. No impact would result due to implementation of the project.

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

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#### Short-term Emissions (Construction)

Project construction activities would potentially generate combustion emissions from on-site heavy duty construction vehicles and motor vehicles transporting the construction crew and necessary construction materials. Exhaust emissions generated by construction activities would generally result from the use of typical construction equipment that may include excavation equipment, forklift, skip loader, and/or dump truck. Variables that factor into the total construction emissions potentially generated include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on or off-site. It is anticipated that construction equipment would be used on-site for four to eight hours a day; however, construction would be short-term and impacts to neighboring uses would be minimal and temporary.

Fugitive dust emissions are generally associated with land clearing and grading operations. Due to the nature and location of the project, construction activities are expected to create minimal fugitive dust, because of the disturbance associated with grading. The project would remodel an existing single-family residence with attached garage. Construction operations would include standard measures as required by the City of San Diego grading permit to reduce potential air quality impacts to less than significant. Therefore, impacts associated with fugitive dust are considered less than significant and would not violate an air quality standard or contribute substantially to an existing or projected air quality violation. Impacts related to short term emissions would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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#### Long-term Emissions (Operational)

Long-term air emission impacts are those associated with stationary sources and mobile sources related to any change caused by a project. The project would produce minimal stationary source emissions. Once construction of the project is complete, long-term air emissions would potentially result from such sources as fireplaces, heating, ventilation, and cooling (HVAC) systems, and other motorized equipment typically associated with residential uses. The project is compatible with the surrounding development and is permitted by the community plan and zone designation. Based on the residential land use, project emissions over the long-term are not anticipated to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Impacts would be less than significant.

Overall, the project is not expected to generate substantial emissions that would violate any air quality standard or contribute to an existing or projected air quality violation; therefore, impacts would be less than significant.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

As described above in response III (b), construction operations may temporarily increase the emissions of dust and other pollutants. However, construction emissions would be temporary and short-term in duration. Implementation of Best Management Practices (BMP's) would reduce potential impacts related to construction activities to a less than significant level. Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under applicable federal or state ambient air quality standards. Impacts would be less than significant.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

#### Short-term (Construction)

Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and architectural coatings. Such odors are temporary and generally occur at magnitudes that would not affect a substantial number of people. Therefore, impacts would be less than significant.

#### Long-term (Operational)

Typical long-term operational characteristics of the project are not associated with the creation of such odors nor anticipated to generate odors affecting a substantial number of people. The project would remodel a single-family residence with two detached garages. Residential dwelling units, in the long-term operation, are not typically associated with the creation of such odors nor are they

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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anticipated to generate odors affecting a substantial number or people. Therefore, project operations would result in less than significant impacts.

#### IV. BIOLOGICAL RESOURCES – Would the project:

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The site has been previously developed within an urban setting, consists primarily of impervious areas which do not support biological resources, and do not contain or support Environmentally Sensitive Lands (ESL) as defined by the Biology Guidelines of the City's Land Development Manual. Native or sensitive vegetation communities, and wetlands that would be expected to support special-status wildlife species, or lands that are classified as Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats are not present.

Due to the site lacking resources implementation of the project would not have a substantial adverse effect on candidate, sensitive, or special-status species as identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. No impact would result due to implementation of the project.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Have a substantial adverse effect on any riparian habitat or other community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

As previously described in response to IV(a), the site has been fully developed within an urban setting, consisting primarily of impervious areas which do not support biological resources, and do not contain or support any ESL. The project would not have a substantial adverse impact on any riparian habitat or other sensitive natural community identified in the LJCP, the City of San Diego General Plan, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. No impact would result due to implementation of the project.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Have a substantial adverse effect on federally protected wetlands as defined by section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is fully developed, in an urban setting. Additionally, as shown in the LJCP and Local Coastal Land Use Plan (LCLUP), there are no federally protected wetlands on site. Therefore, construction activities would not cause an impact to wetlands as defined by Section 404 of the Clean

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Water Act. There would be no impacts to federally protected wetlands. No impact would result due to implementation of the project.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is fully developed, in a highly urbanized setting. The project site is not located within a wildlife corridor, or within a migratory passageway for any native resident or migratory fish or wildlife species. No impact would result due to implementation of the project.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would be consistent with all relevant goals and policies of the City's General Plan and of the LJCP and LCLUP regarding the preservation and protection of biological resources. Although the proposed project is not within the City's Multi-Habitat Planning Area (MHPA), the project would be consistent with all relevant goals and policies regarding the preservation and protection of biological resources, as outlined in the City's Multiple Species Conservation Program (MSCP). Additionally, project implementation would be consistent with all biological resources policies in the LJCP and LCLUP. No impact would result due to implementation of the project.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

Although the proposed project is not within the City's MHPA, the project would be consistent with all relevant goals and policies regarding the preservation and protection of biological resources, as outlined in the City's MSCP. In addition, implementation of the project would be consistent with all biological resources policies outlined in the LJCP and LCLUP. No impact would result due to implementation of the project.

#### V. CULTURAL RESOURCES – Would the project:

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

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. Before approving discretionary projects, CEQA requires the Lead Agency to identify and examine the significant adverse environmental effects which may result from that project. A project that may cause a substantial

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

#### Archaeological Resources

The project site is located within the City of San Diego's Historical Resources Sensitivity map. Therefore, additional analysis was required to make a CEQA determination in regards to archaeological resources. Qualified City Staff conducted a record search of the California Historic Resources Information System (CHRIS) digital database to determine the presence or absence of potential resources within the project site and within a one-mile radius of the project. No on-site archaeological resources were identified within or adjacent to the project.

City staff also reviewed site photos, project plans, and the geotechnical investigation report (CWE, July 2018) to determine if the project could potentially impact these resources. The geotechnical report shows that the existing property is on artificial fill and that grading will not go beyond that fill. The existing topography and data from the geotechnical report are indicative of construction consisting of cut and fill operations for the construction of the subdivision in 1950's and 1960's. Based upon the topography, the disturbed nature of the site as indicated in the geotechnical report and the negative CHRIS search it was determined that the project would not have the potential impact to any unique or non-unique historical resources. Therefore, impacts would not occur and mitigation is not required.

#### Built Environment

The property located at 6340 Camino de la Costa is not an individually designated resource and is not located within a designated historic district. However, San Diego Municipal Code Section 143.0212 requires City staff to review all projects impacting a parcel that contains a structure 45 years old or older to determine whether a potentially significant historical resource exists on site prior to issuance of a permit. Qualified City Staff has reviewed site photos; Assessor's Building Record; water and sewer records; written description of the property and alterations; chain of title; and listing of occupants; as well as any available historic photographs; Sanborn maps; and Notices of Completion.

In addition, staff has considered input received through applicable public noticing and outreach and have made the following determination, Staff has determined that the property does not meet local designation criteria as an individually significant resource under any adopted Historical Resources Board Criteria and a historic report was not required. Therefore, EAS finds that the project site does not meet the criteria of being a significant historical resource as defined by the City of San Diego's Significance Determination Thresholds. No impacts would result to Cultural Resources (Built Environment).

- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Please refer to response V.a.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is underlain by the Point Loma geological formation, which has a moderate potential for paleontological resources. In "moderate potential" formations, grading in excess of 2000 cubic yards at a depth of 10 feet or more requires mitigation, which includes paleontological monitoring during construction. In "high potential" formations, grading in excess of 1000 cubic yards at a depth of 10 feet or more requires mitigation, which includes paleontological monitoring during construction.

Per Sheet 01 of the submitted development plans all new construction will be built on existing impervious surfaces and new foundation work will be minimal. Therefore, the project will not exceed grading the City's Thresholds for paleontology. No impacts would result from this project.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| d) Disturb and human remains, including those interred outside of dedicated cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Refer to response V(a) above. No cemeteries, formal or informal, have been identified on the project site. No impact would result due to implementation of the project.

#### VI. GEOLOGY AND SOILS – Would the project:

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

The project is not located within an Alquist-Priolo Fault Zone and would utilize proper engineering design and standard construction practices to ensure that potential impacts in this category would remain less than significant. Therefore, risks from rupture of a known earthquake fault would not be significant. No impact would result due to implementation of the project.

- |                                    |                          |                          |                                     |                          |
|------------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| ii) Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|------------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|

References: Addendum to Report of Preliminary Geotechnical Investigation, Proposed Abbott Residence Additions, 6340 Camino De La Costa, La Jolla, California, prepared by Christian Wheeler Engineering, dated June 19, 2018 (their project no. CWE 2170156.07).

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Addendum Geotechnical Report and Response to LDR-Geology Cycle 6 LDR Geology Review Comments, Proposed Abbott Residence Additions, 6340 Camino De La Costa, La Jolla, California, prepared by Christian Wheeler Engineering, dated June 4, 2018 (their project no. CWE 2170156.06).

Geotechnical Response to Letter dated March 30, 2018, Proposed Abbott Residence Additions, 6340 Camino De La Costa, La Jolla, California, prepared by Christian Wheeler Engineering, dated July 5, 2018 (their project no. CWE 2170156.05R).

Third Party Review, Geotechnical Investigation and Response to City of San Diego Review Comments, 6340 Camino De La Costa, La Jolla, California, prepared by TerraCosta Consulting Group, dated June 29, 2018 (their project no. 3018).

The project site is mapped as Geologic Hazard Categories 53 and 44. Geologic hazard category 53 is described as level or sloping terrain, unfavorable geologic structure, low to moderate risk. Geologic hazard category 44 is described as coastal bluffs; moderately stable formations, local high erosion. The site could be affected by seismic activity because of earthquakes on major active faults located throughout the Southern California area. Ground shaking from ten major active fault zones could affect the site in the event of an earthquake. However, per the submitted approved geotechnical investigation (See references above), there are no known faults on the project site and impacts would not be significant.

iii) Seismic-related ground failure, including liquefaction?

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Liquefaction occurs when loose, unconsolidated, water-laden soils are subject to shaking, causing the soils to lose cohesion. Per the geotechnical report available information indicates that the location and geotechnical conditions at the site are not conducive to any of these phenomena.

References: Addendum to Report of Preliminary Geotechnical Investigation, Proposed Abbott Residence Additions, 6340 Camino De La Costa, La Jolla, California, prepared by Christian Wheeler Engineering, dated June 19, 2018 (their project no. CWE 2170156.07).

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Third Party Review, Geotechnical Investigation and Response to City of San Diego Review Comments, 6340 Camino De La Costa, La Jolla, California, prepared by TerraCosta Consulting Group, dated June 29, 2018 (their project no. 3018).

In addition to the above record, opponents to the project submitted a Geotechnical/Bluff Recession Review (Geotechnical Exploration, Inc. (GEI), September 2017) and Cycle 6 California Coastal Commission and City of San Diego LDR – Geology and Planning Reviews (Geotechnical Exploration,

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Inc. (GEI), August 2018). The two GEI reports argue that the City will not allow the applicant to utilize a 25 foot set back based upon the rate of bluff recession.

The applicant's geotechnical consultant (Addendum to Report of Preliminary Geotechnical Investigation, Proposed Abbott Residence Additions, 6340 Camino De La Costa, La Jolla, California, prepared by Christian Wheeler) conducted an analysis to determine the bluff's stability. The Christian Wheeler Engineering (CWE) report analyzed the bluff and determined that the bluff is stable, and a 25-foot setback was allowed. Additionally, a third-party review of the geotechnical investigation was performed by Terra Costa Consulting Group (Terra Costa, June 2018). Per the Terra Costa report "this site, along with the neighboring properties, has high factors of safety against slope instability and relatively low erosion rates. This is in large part due to the extensive highly erosion resistant Point Loma shelf rock that extended up to about elevation 20 feet on the property." In addition, the Terra Costa report addresses the existing retaining wall, built in 1962. This permitted rear yard wall was concurrently constructed with the residence to delineate and set the westerly limits of the rear yard of the property. Based upon the lack of erosion at the base of the wall the 56-year-old rear yard wall is not providing any shoreline protection. Both the CWE and Terra Costa report agree that the currently proposed improvements to the subject property will be safe against coastal erosion for the next 75 years with a 25-foot rear yard bluff-top setback. Qualified City geology staff reviewed the submitted geotechnical studies, including the third-party Terra Costa review, and determined that the geotechnical consultant has adequately addressed the soil and geologic conditions potentially affecting the proposed project. Based upon the information provided in the CWE and Terra Costa reports City staff determined that the concerns raised by the GEI report were adequately addressed. Moreover, the project would be conditioned to submit a geotechnical investigation report or update letter that specifically addresses the proposed construction plans. The geotechnical investigation report or update letter will be reviewed for adequacy by the Geology Section of the Development Services Department prior to issuance of any construction permits. Impacts would remain less than significant.

iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Per the approved geotechnical reports landslides have not been mapped as being present, both on or immediately adjacent to the site. Furthermore, the project site is not mapped in a landslide zone. No impact would result from implementation of the project.

b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project includes a landscape plan that has been reviewed and approved by City staff that precludes erosion of topsoil. In addition, standard construction BMPs would be in place to ensure that the project would not result in a substantial amount of topsoil erosion. No impact would result from implementation of the project.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
landslide, lateral spreading, subsidence, liquefaction or collapse?				

Please see VI(a)(iii). Proper engineering design and utilization of standard construction practices would be verified at the construction permitting stage and would ensure that impacts in this category would not occur. No impact would result from implementation of the project.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project is not located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code. The design of the project would utilize proper engineering design and standard construction practices to ensure that the potential for impacts would not occur.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project does not propose the use of septic tanks. As a result, septic tanks or alternative wastewater systems would not be used. Therefore, no impact regarding the capability of soils to adequately support the use of septic tanks or alternative wastewater disposal systems would result.

VII. GREENHOUSE GAS EMISSIONS – Would the project:

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

On July 12, 2016, the City of San Diego adopted the Climate Action Plan (CAP) Consistency Checklist, which requires all projects subject to discretionary review to demonstrate consistency with the Climate Action Plan. For project-level environmental documents, significance of greenhouse gas emissions is determined through the CAP Consistency Checklist.

The City's Climate Action Plan (CAP) outlines the actions that the City will undertake to achieve its proportional share of State greenhouse gas (GHG) emission reductions. A CAP Consistency Checklist (Checklist) is part of the CAP and contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emission targets identified in the CAP are achieved. Projects that are consistent with the CAP as determined through the use of this Checklist may rely on the CAP for the cumulative impacts of GHG emissions.

The project is consistent with the existing General Plan and Community Plan land use and zoning designations. Further based upon review and evaluation of the completed CAP Consistency Check for the project, the project is consistent with the applicable strategies and actions of the CAP. Therefore, the project is consistent with the assumptions for relevant CAP strategies toward

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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achieving the identified GHG reduction targets, and impacts from greenhouse gas emissions are considered less than significant. No mitigation is required.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of greenhouse gases. The project is consistent with the existing General Plan and Community Plan land use and zoning designations. Further based upon review and evaluation of the completed CAP Consistency Checklist for the project, the project is consistent with the applicable strategies and actions of the CAP. Therefore, the project is consistent with the assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets. Impacts are considered less than significant. No mitigation is required.

#### VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The proposed project is residential in nature and does not propose the use or transport of any hazardous materials beyond those used for everyday household purposes. Therefore, no such impacts would occur.

Construction of the project may require the use of hazardous materials (fuels, lubricants, solvents, etc.), which would require proper storage, handling, use and disposal; however, the project would not routinely transport, use or dispose of hazardous materials. Therefore, the project would not create a significant hazard to the public or environment. No impact would result due to implementation of the project.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Please see VIIIa. No impact would result due to implementation of the project.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Please see VIIIa. No impact would result due to implementation of the project.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Staff assessed Geotracker and Envirostor databases, and reviewed the Cortese list.

Geotracker is a database and geographic information system (GIS) that provides online access to environmental data. It tracks regulatory data about leaking underground fuel tanks (LUFT), Department of Defense (DoD), Spills-Leaks-Investigations-Cleanups (SLIC), and Landfill sites.

Envirostor is an online database search and Geographic Information System (GIS) tool for identifying sites that have known contamination or sites for which where reasons may be to investigate further. It also identifies facilities that are authorized to treat, store, dispose or transfer (TSDTF) hazardous waste.

The Cortese List is a Hazardous Waste and Substance Sites (Cortese) List, which is a planning resource use by the State, local agencies, and developers to comply with the California Environmental Quality Act (CEQA) requirements in providing information about the location of hazardous materials release sites. Government Code sections 65962.5 requires the California Environmental Protection Agency to develop, at least annually, an updated Cortese List. The Department of Toxics and Substance Control (DTSC) is responsible for a portion of the information contained in the Cortese List. Other State and local government agencies are required to provide additional hazardous material release information for the Cortese List.

Based on the searches conducted, no contaminated sites are on or adjacent to the project site. Furthermore, the project site was not identified on the DTSC Cortese List. Therefore, the project would not create a significant hazard to the public or the environment. No impact would result due to implementation of the project.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two mile of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project is not located within the boundaries of an existing airport land use plan or an airport land use plan pending adoption. The project is not located within the flight path of any airport and would not introduce any new features that would create a flight hazard. No impact would result due to implementation of the project.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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This project is located in a developed neighborhood with no private airstrip located in the immediate vicinity. No impact would result due to implementation of the project.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would not impair the implementation of, or physically interfere with, an adopted emergency response plan or evacuation plan. No roadway improvements are proposed that would interfere with circulation or access, and all construction would take place on-site. No mitigation measures are required. No impact would result due to implementation of the project.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

This project is in a developed neighborhood with no wildlands located adjacent to the site or within the adjacent neighborhood. Therefore, it would not be possible to cause wildland fires directly. No impact would result due to implementation of the project.

IX. HYDROLOGY AND WATER QUALITY - Would the project:

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Violate any water quality standards or waste discharge requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

All runoff would be routed to the existing City of San Diego public conveyance system (curb and gutters). Compliance with the City of San Diego's Storm Water Standards would ensure that water quality impacts would not occur, and mitigation is not required. No impact would result due to implementation of the project.

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

The project would be connected to the public water supply. It would not rely directly on groundwater in the area and would not significantly deplete any resources. No impact would result due to implementation of the project.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Substantially alter the existing drainage pattern of the site or area, including | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?

Proper landscaping would prevent substantial erosion onsite. No stream or river is located on or adjacent to the site, all runoff would be routed to the existing storm drain system and would therefore not substantially alter existing drainage patterns. No impact would occur.

- d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?

☐
☐
☐
☒

Please see IX.c., no flooding would occur. No impact would result due to implementation of the project.

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

☐
☐
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Based on City of San Diego review, the proposed activity would be adequately served by existing municipal storm water drainage facilities, therefore no impacts would occur. Potential release of sediment or other pollutants into surface water drainages downstream from the site will be precluded by implementation of Best Management Practices (BMPs) required by City of San Diego regulations, in compliance with San Diego Regional Water Quality Control Board requirements to implement the federal Clean Water Act. Therefore, no significant surface water quality impacts are expected to result from the proposed activity. Proper irrigation and landscaping would ensure that runoff would be controlled and unpolluted. No impact would result due to implementation of the project.

- f) Otherwise substantially degrade water quality?

☐
☐
☐
☒

See IX. e) No impact would result due to implementation of the project.

- g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

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The project does not propose construction of any new housing in the 100-year flood hazard area and impacts in this category would not occur. No impact would result due to implementation of the project.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
h) Place within a 100-year flood hazard area, structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project does not propose construction of any features that would impede or redirect flows. No impact would result due to implementation of the project.

X. LAND USE AND PLANNING – Would the project:

a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project is consistent with the General Plan and La Jolla Community Plan land use designation. The project site is located within a developed residential neighborhood and surrounded by similar residential development. The addition of a second floor to an existing single dwelling unit would not affect adjacent properties and is consistent with surrounding land uses. Therefore, the project would not physically divide an established community. No impact would result due to implementation of the project.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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See response X(a) above. The project is compatible with the area designated for residential development by the General Plan and Community Plan and is consistent with the existing underlying zone and surrounding land uses. Construction of the project would occur within an urbanized neighborhood with similar development. Furthermore, the project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan community plan, or zoning ordinance) adopted for avoiding or mitigating an environmental effect. No conflict would occur and this, no impacts would result.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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As previously discussed in Section IV, although the proposed project is not within the MHPA, the project would be consistent with all relevant goals and policies regarding the preservation and protection of biological resources, as outlined in the City's MSCP. The proposed project does not have the potential to conflict with any habitat conservation plans. In addition, implementation of the project would be consistent with all biological resources policies outlined in the General Plan, La Jolla Community Plan and Local Coastal Land Use Plan. Implementation of the project would not conflict with any applicable plans, and no impact would occur.

XI. MINERAL RESOURCES – Would the project:

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

This project site is in a developed neighborhood not suitable for mineral extraction and is not identified in the General Plan as a mineral resource locality. Therefore, the project would not result in the loss of availability of a known mineral resource. No impact would result due to implementation of the project.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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See XI a. No impact would result due to implementation of the project.

#### XII. NOISE – Would the project result in:

a) Generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Construction related noise would result but would be temporary and is strictly regulated under San Diego Municipal Code Section 59.5.0404, "Noise Abatement and Control" which places limits on the hours of construction operations and standard decibels which cannot be exceeded. Therefore, people would not be exposed to noise levels more than those covered by existing noise regulations. No impact would result due to implementation of the project.

b) Generation of, excessive ground borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No excessive noise is anticipated because of the demolition and new construction. Therefore, no ground vibration would result. No impact would result due to implementation of the project.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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See XII the project once complete would not result in any permanent noise increase. No impact would result due to implementation of the project.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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As stated above there would be a temporary increase in noise during the construction of the proposed project; however, work would only be allowed between the hours of 7 am and 7 pm in

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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compliance with the City of San Diego's noise ordinance for construction activities. After construction is completed, no substantial increase in noise levels would result from this dwelling unit. No impact would result due to implementation of the project.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport would the project expose people residing or working in the area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project is not located within an airport land use plan or within noise contours. Therefore, residents of the new building would not be exposed to excessive noise levels from a public airport. No impact would result due to implementation of the project.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project is not located within the vicinity of a private airstrip; therefore, people residing or working in the area of the project would not be exposed to excessive airport noise. No impact would result due to implementation of the project.

### XIII. POPULATION AND HOUSING – Would the project:

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would remodel an existing dwelling unit; therefore, the project would not result in an increase in units of residential housing. No impact would result due to implementation of the project.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

No displacement would occur because of this project. The project would remodel an existing dwelling unit; therefore, the project would not result in an increase in units of residential housing. No impact would result due to implementation of the project.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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See XIII. No impact would result due to implementation of the project.

#### XIV. PUBLIC SERVICES

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

i) Fire protection ☐ ☐ ☐ ☒

The City of San Diego Fire-Rescue Department (SDFD) encompasses all fire, emergency medical, lifeguard and emergency management services. SDFD serves 331 square miles, including the project site, and serves a population of 1,337,000. SDFD has 801 uniformed fire personnel and 48 fire stations available to service the project site. The closest fire station to the project site is Station 13 (approximately 0.9 miles northeast).

The project is an addition to an existing dwelling unit and would not require the alteration of any fire protection facilities and would not require any new or altered fire protection services. No impact would result due to implementation of the project.

ii) Police protection ☐ ☐ ☐ ☒

The City of San Diego Police Department (SDPD) would serve the proposed project. The project site is located within the SDPD's Northern Division, which serves a population of 225,234 people and encompasses 41.3 square miles. The remodeling project would not require the alteration of any fire protection facilities and would not require any new or altered police protection services. No impact would result due to implementation of the project.

iii) Schools ☐ ☐ ☐ ☒

The project would not physically alter any schools. Additionally, the project would not include construction of future housing or induce growth that could increase demand for schools in the area. No impact would result due to implementation of the project.

iv) Parks ☐ ☐ ☐ ☒

The nearest park to the project site is Bird Rock Park, approximately 1.7 miles south. In addition to this park the Pacific Ocean, specifically La Jolla Cove, is located approximately 2.3 miles north of the site. The project would not induce growth that would require substantial alteration to an existing park and the construction of a new park does not have a population-based park requirement. No impact would result due to implementation of the project.

v) Other public facilities ☐ ☐ ☐ ☒

The scope of the project would not substantially increase the demand for electricity, gas, or other public facilities. No impact would result due to implementation of the project.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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#### XV. RECREATION

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

This project is the remodel of an existing dwelling unit. It would not require any expansion of existing recreational facilities. There would be no increase in the use of existing facilities in the area including parks or other recreational areas. No impact would result due to implementation of the project.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project does not include the construction of recreational facilities nor does it require the construction or expansion of recreational facilities. No impact would result due to implementation of the project.

#### XVI. TRANSPORTATION/TRAFFIC – Would the project?

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project is a remodel of an existing dwelling unit. The remodeled dwelling unit would not change road patterns or congestion. In addition, the project would not require the redesign of streets, traffic signals, stop signs, striping or any other changes to the existing roadways or existing public transportation routes or types are necessary. No impact would result due to implementation of the project.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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See XVI a. No impact would result due to implementation of the project.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project is in a residential community outside of airport land use plan areas. The project is consistent with height and bulk regulations and is not at the scale which would result in a change in air traffic patterns. No impact would result due to implementation of the project.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

See XVI a. No impact would result due to implementation of the project.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

See XVI a. No impact would result due to implementation of the project.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would not alter the existing conditions of the project site or adjacent facilities in regards to alternative transportation. Construction of the project would not result in design measures or circulation features that would conflict with existing policies, plan, or programs supporting alternative transportation. No impact would result due to implementation of the project.

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

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

At the project site there are no resources, that are listed or eligible for listing in the California Register of Historical Resources, or in a local register. In addition, please see section V(a) above. No impact would result due to implementation of the project.



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Tribal Cultural Resources include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Native American Tribe. Tribal Cultural Resources include “non-unique archaeological resources” that, instead of being important for “scientific” value as a resource, can also be significant because of the sacred and/or cultural tribal value of the resource. Tribal representatives are considered experts appropriate for providing substantial evidence regarding the locations, types, and significance of tribal cultural resources within their traditionally and cultural affiliated geographic area (PRC § 21080.3.1(a)).

Tribal Cultural Resources could potentially be impacted through project implementation. Therefore, in order to determine if the project could potentially impact Tribal Cultural Resources, staff consulted with the Iipay Nation of Santa Ysabel and the Jamul Indian Village in accordance with the requirements of Public Resources Code 21080.3.1. These tribes were notified via email on July 19, 2017. Both tribes responded within the 30-day formal notification period requesting consultation; subsequently consultation took place on November 13, 2017.

During consultation, Tribal Cultural Resources were not identified. Both tribes concurred with staff’s determination that no archaeological monitoring nor Native American monitoring would be required. Consultation was concluded with both tribes.

Therefore, no significant resources pursuant to subdivision (c) of Public Resources Code Section 5024.1 have been identified on the project site. In addition, please see section V(a) above. No impact would result due to implementation of the project.

#### XVIII. UTILITIES AND SERVICE SYSTEMS – Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Implementation of the project would not interrupt existing sewer service to the project site or other surrounding uses. No increase in demand for wastewater disposal or treatment would be created by the project, as compared to current conditions. The project is not anticipated to generate significant amounts of waste water. Wastewater treatment facilities used by the project would be operated in accordance with the applicable wastewater treatment requirements of the Regional Water Quality Control Board (RWQCB). Additionally, the project site is in an urbanized and developed area. Adequate services are already available to serve the project and no mitigation measures are required. No impact would result due to implementation of the project.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

This project would not result in an increase in the intensity of the use and would not be required to construct a new water or wastewater treatment facility. No impact would result due to implementation of the project.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project would not exceed the capacity of the existing storm water drainage systems and therefore, would not require construction of new or expansion of existing storm water drainage facilities of which could cause significant environmental effects. The project was reviewed by qualified City staff who determined that the existing facilities are adequately sized to accommodate the proposed development. No impact would result due to implementation of the project.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project does not meet the CEQA significance threshold that would require the preparation of a water supply assessment. The existing project site currently receives water service from the City, and adequate services are available to serve the proposed residential dwelling unit without required new or expanded entitlements. No impact would result due to implementation of the project.

e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Construction of the project would not adversely affect existing wastewater treatment services. Adequate services are available to serve the project site without required new or expanded entitlements. Impacts would be less than significant, and no mitigation measures are required.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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While construction debris and waste would be generated from the remodel of the single family residence it would not rise to the level of significance for cumulative (construction, demolition, and

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
or renovation of 40,000 square feet) or direct (construction, demolition, or renovation of 1,000,000 square feet) impacts as defined by the City's Thresholds. All construction waste from the project site would be transported to an appropriate facility, which would have adequate capacity to accept the limited amount of waste that would be generated by the project. Long-term operation of the proposed residential unit is anticipated to generate typical amounts of solid waste associated with residential use. Furthermore, the project would be required to comply with the City's Municipal Code for diversion of both construction waste during the demolition phase and solid waste during the long-term, operational phase. Impacts would be less than significant.				

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| g) Comply with federal, state, and local statutes and regulation related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project would comply with all Federal, State, and local statutes and regulations related to solid waste. The project would not result in the generation of large amounts of solid waste, nor generate or require the transport of hazardous waste materials, other than minimal amounts generated during the construction phase. All demolition activities would comply with any City of San Diego requirements for diversion of both construction waste during the demolition phase and solid waste during the long-term, operation phase. Impacts would be less than significant and no mitigation measures are required.

#### XIX. MANDATORY FINDINGS OF SIGNIFICANCE –

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The site has been fully developed within an urban setting, and does not contain or support any Environmentally Sensitive Lands as defined by the Biology Guidelines of the City's Land Development Manual, native or sensitive vegetation communities, wetlands that would be expected to support special-status wildlife species, or lands that are classified as Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats. Implementation of the project would not have a substantial adverse effect on candidate, sensitive, or special-status species as identified in local or regional plans, policies, or regulations, and the project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the Pacific Beach Community Plan, the City of San Diego General Plan, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project have impacts that are individually limited but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The City of San Diego conducted an Initial Study which determined that the project would not have a significant environmental effect. No impacts would result due to implementation of the project.

c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The City of San Diego conducted an Initial Study which determined that the project would not have a significant environmental effect.

**INITIAL STUDY CHECKLIST  
REFERENCES**

**I. Aesthetics / Neighborhood Character**

- ☒ City of San Diego General Plan  
☐ Community Plans:

**II. Agricultural Resources & Forest Resources**

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

**III. Air Quality**

- ☐ California Clean Air Act Guidelines (Indirect Source Control Programs) 1990  
☒ Regional Air Quality Strategies (RAQS) - APCD  
☐ Site Specific Report:

**IV. Biology**

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

**V. Cultural Resources (includes Historical Resources)**

- ☒ City of San Diego Historical Resources Guidelines  
☒ City of San Diego Archaeology Library  
☐ Historical Resources Board List  
☐ Community Historical Survey:  
☒ Site Specific Report: 7985 Calle de la Plata Initial Archaeological Evaluation (Meridian Archaeological, February 2018)

**VI. Geology/Soils**

- ☐ City of San Diego Seismic Safety Study  
☐ U.S. Department of Agriculture Soil Survey - San Diego Area, California, Part I and II, December 1973 and Part III, 1975  
☐ Site Specific Report:

**VII. Greenhouse Gas Emissions**

- ☒ Site Specific Report: City of San Diego CAP Checklist

**VIII. Hazards and Hazardous Materials**

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

**IX. Hydrology/Drainage**

- ☐ Flood Insurance Rate Map (FIRM)
- ☐ Federal Emergency Management Agency (FEMA), National Flood Insurance Program-Flood Boundary and Floodway Map
- ☐ Clean Water Act Section 303(b) list, [http://www.swrcb.ca.gov/tmdl/303d\\_lists.html](http://www.swrcb.ca.gov/tmdl/303d_lists.html)
- ☐ Site Specific Report:

**X. Land Use and Planning**

- ☒ City of San Diego General Plan
- ☒ Community Plan
- ☒ Airport Land Use Compatibility Plan
- ☒ City of San Diego Zoning Maps
- ☐ FAA Determination
- ☐ Other Plans:

**XI. Mineral Resources**

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

**XII. Noise**

- ☐ City of San Diego General Plan
- ☐ Community Plan
- ☐ San Diego International Airport - Lindbergh Field CNEL Maps
- ☐ Brown Field Airport Master Plan CNEL Maps
- ☐ Montgomery Field CNEL Maps
- ☐ San Diego Association of Governments - San Diego Regional Average Weekday Traffic Volumes
- ☐ San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
- ☐ Site Specific Report:

**XIII. Paleontological Resources**

- ☒ City of San Diego Paleontological Guidelines
- ☒ Deméré, Thomas A., and Stephen L. Walsh, "Paleontological Resources City of San Diego," Department of Paleontology San Diego Natural History Museum, 1996

- ☐ Kennedy, Michael P., and Gary L. Peterson, "Geology of the San Diego Metropolitan Area, California. Del Mar, La Jolla, Point Loma, La Mesa, Poway, and SW 1/4 Escondido 7 1/2 Minute Quadrangles," *California Division of Mines and Geology Bulletin* 200, Sacramento, 1975
- ☐ Kennedy, Michael P., and Siang S. Tan, "Geology of National City, Imperial Beach and Otay Mesa Quadrangles, Southern San Diego Metropolitan Area, California," Map Sheet 29, 1977
- ☐ Site Specific Report:

**XIV. Population / Housing**

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

**XV. Public Services**

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

**XVI. Recreational Resources**

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

**XVII. Transportation / Circulation**

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

**XVIII. Utilities**

- ☐ Site Specific Report:

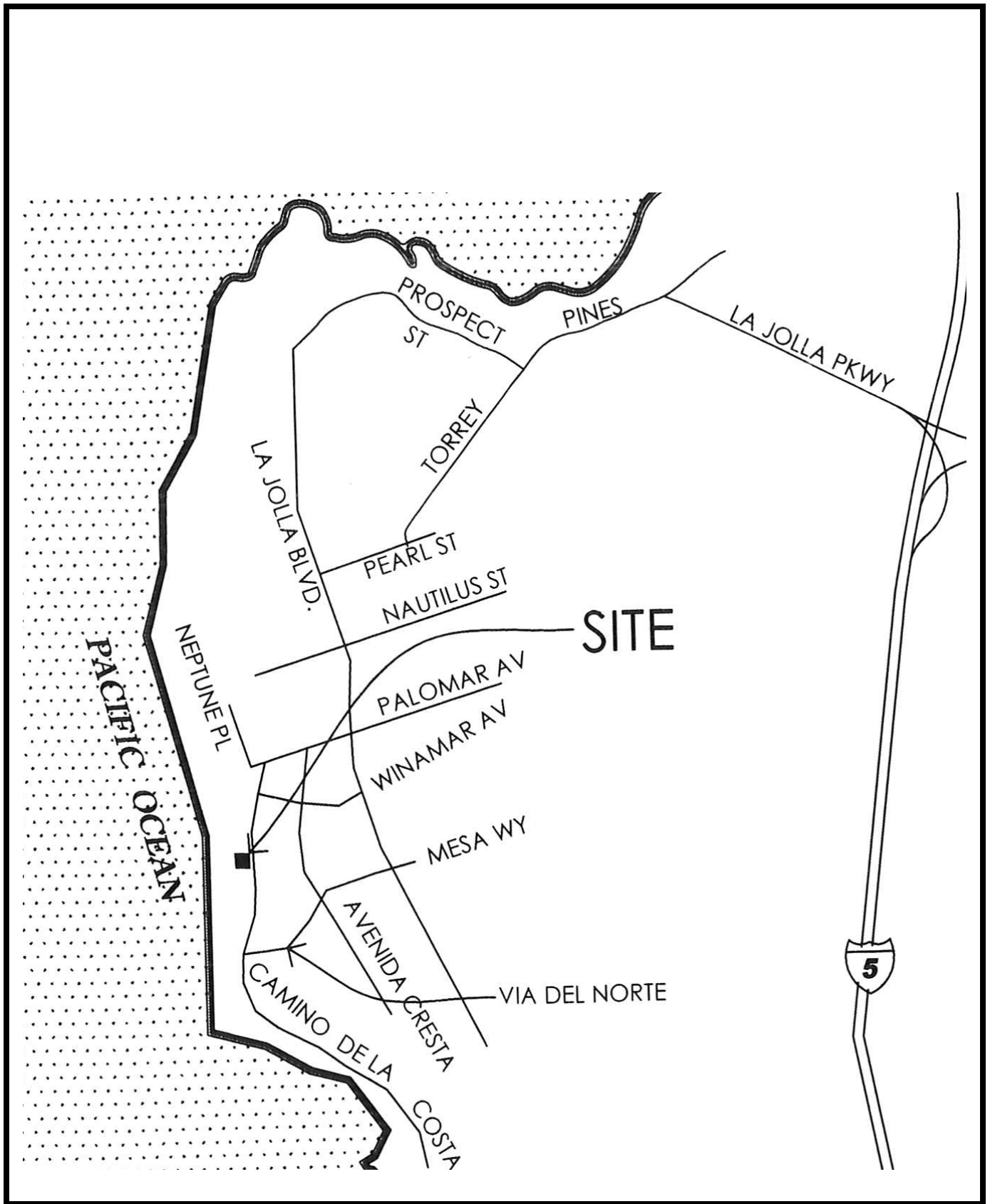
**XIX. Water Conservation**

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

**XX. Water Quality**

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

Revised: February 2018



## Location Map

Abbott Residence CDP SDP/Project No. 538814

City of San Diego – Development Services Department

**FIGURE**

**No. 1**





Abbott Residence CDP SDP/Project No. 538814  
City of San Diego – Development Services Department

**FIGURE**  
**No. 2**